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28th January 2016

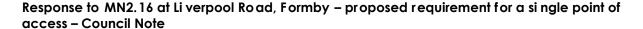
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FAO: Mr Martin Pike BA MA MRTPI, Inspector Sefton Local Plan Examination

Sent by email and hard copy

Dear Mr Pike,



This representation, submitted on behalf of Morris Homes Northern Ltd ('Morris Homes') and Ballagorryveg Development Ltd, relates specifically to the note prepared by Sefton Council relating to MN2.16 Land at Liverpool Road, Formby in response to discussion at the EIP hearing on 15th January 2016. This representation has been prepared by AECOM on behalf of Morris Homes.

Taking each point raised by the Council (in italics) in turn:

1. The matter of access to the site MN2.16 has been queried and the following note has been prepared accordingly.

No comment.

2. The Local Authority has stated that access to site MN2.16 should be afforded through one priority junction on Liverpool Road, Formby.

The Local Authority had stated previously at the Local Plan hearings on 9th December 2015 and 15th January 2016 that a single point of access to site MN2.16 was specified in Appendix 1 of the Local Plan as this is their 'preference'. No justification has been presented to support that a single point of access should be specified for the site (MN2.16) as a policy requirement in Appendix 1 of the Local Plan. SMBC's 'preference' for a single access point has been based on the transport assessment work submitted as part of the 'withdrawn' 2013 Da vid Wilson Homes/Barratt Homes planning application for c.274 residential dwellings on land to the east of the drainage. It should be noted that this 'withdrawn' a pplication considered only part of the proposed site allocation which excluded the Morris Homes land.

3. Liverpool Road from its junction with the roundabout is derestricted for a distance of approximately 470m where it then reduces to a 30mph speed limit. The proposed access road must p rovide adequate visibility plays in accordance with DMRB and Manual for Streets. This in itself requires a parcel of the site to be free from obstruction. The visibility requirement for an access onto this road is 215m.



As highlighted by SMBC, Liverpool Road is subject to the national speed limit which, given the nature of the road with no exiting a ccesses or a ctive frontage, is currently appropriate. A new junction onto a derestricted road would indeed have requirement to visibility splays of 215m in accordance with DMRB.

However, on the basis that a new residential development would be delivered with accesses onto Liverpool Road this would change the nature of Liverpool Road and therefore meet the criteria, set by the Department for Trans port, for a reduction in the speed limit.

A Transport Assessment submitted as part of a future planning application would seek to extend the existing 30mph speed limit on Liverpool Road or, as a minimum, introduce a new 40mph from the Formby Bypass roundabout in the interest of road safety. As a result of the ex tension of the 30mph or the introduction of a 40mph speed limit, visibility splay requirements would be reduced to 43m (in accordance with Manual for Streets) or 90m (in accordance with DMRB) respectively. In fact, a reduction in the speed limit on Liverpool Road was proposed as part of the 'withdrawn' 2013 David Wilson Homes/Barratt Homes planning application which was supported by a Stage 1 Road Safety Audit and SMBC. Therefore, there is a clear case for a speed limit reduction and related visibility reduction.

On this basis, there is no technical justification, based on junction visibility, that a single access point located in the land to the east should be set as a policy requirement in Appendix 1 of the Local Plan.

4. The priority junction will require a right turn ghost island into the proposed development in order to provide safe turning manoeuvres.

As shown in the Plan 005 (Option A) and P lan 006 (Option B), prepared by AECOM on behalf of Morris Homes which were submitted as representations to the Local Plan on 4th January 2016, a right ghost island can be provided for the two access option and a single access option into the Morris Homes land in accordance with current design guidance.

5. If an additional access were to be proposed at the south-western edge of the site and near to the bend on Liverpool Road, there would be insufficient space to provide the adequate visibility splay for this and the originally proposed junction together with the provision of a second additional right turn ghost island. This is due to the proximity to the bend of Liverpool Road and proximity of the bus stops (one is in place now with another required on the opposite side) and as such, there would be highway safety implications of having two separate priority junctions along this section of Liver pool Road together with two bus laybys.

In response to the point raised on visibility splays, I refer to the response to Point 3. The bend on Liverpo ol Road is approximately 120m from the access option into the Morris Homes land to the west shown on Plans 005 and 006. Therefore, a reduction in the speed limit to 30mph or 40mph would means that a more than adequate visibility splay could be provided in accordance with Manual for Streets and DMRB.

Current guidance does not restrict the provision of bus stop lay-bys located within visibility splays. I would nonetheless note that a reduced speed limit would mean the existing lay-

by on Liverpool Ro ad would only partially be within a 90m visibility splay and located outside of a 43m visibility splay.

With regard to the spacing between two accesses, SMBC's own Street Design Guide references a minimum distance for junction spacing on the same side of a road of 80m. Plan 005 shows a separation between the two access points of 90m which is in excess of the minimum distance. Furthermore, this could easily be increased by moving the access to east towards the roundabout.

6. The single point of access would need to be of a standard that would enable it to be upgraded/improved i nto a si gnalised j unction at s ome s tage in the future should it become necessary. This would make a se cond access in close proximity unfeasible in highway terms.

There is no technical evidence to support the requirement for a potential future upgrade of an access to be signal controlled. Previous junction capacity analysis undertaken within the Transport Assessment (July 2013) as part of the 'withdrawn' 2013 David Wilson Homes/Barratt Homes planning application demonstrated that, based on 350 residential units, a priority junction with a right turn ghost island would operate well within its practical capacity during the AM and PM peak periods in the future year scenario.

Furthermore, it is not unfeasible to provide two accesses into the site which includes signal controls. On the basis that there are no current schemes with live planning applications, this would be subject to a technical assessment submitted as part of a future planning application. It is therefore premature to set a policy requirement on a site as part of the Local Plan which is based on 'preference' and not technical evidence.

7. The most appropriate method of access to the site is as set out in point 2 and 4 above, namely one priority junction on Liverpool Road, Formby serving the whole site and located at a point east of the existing drainage ditch that runs south from No28 Monks Drive to Liverpool Road. It is preferable to locate the access point on this side of the drainage ditch to provide the requisite visibility splay.

This point is stating SMBC's 'preference' on where a site access should be located and is not support by technical evidence. In relation to visibility, I refer to the previous responses.

8. A package of improvements would be necessary including the provision of a new bus stop a nd upgrade of o thers together with a seri es of accessibility im provements connecting the town centre, schools and nearby bus stops.

Agreed. As part of a planning application(s) a sustainable transport strategy would be developed as part of a Transport Assessment(s) to provide for walking, cycling and public transport journeys. This would not impact on the provision of two access points or a single access point being provided into the Morris Homes land.

Yours sincerely



Nicola Rigby BA (Hons) MTPI MRTPI Director For and on behalf of GVA Grimley Limited