

Environment & Transport Directorate Internal Memorandum

To: Martha Hughes

From: Kevin Jackson

Date: 14/10/25

Ref: 2024/00668/FUL

Application: Spring Lane Nurseries, Warrington, WA3 7AS

Description: Change of use of land to use as residential caravan site for 5 gypsy/traveller families, each with two caravans including no more than one static caravan/mobile home, together with the laying of hardstanding and erection of communal amenity building.

Following receipt of the rule 6 party's comments we would update our comments as follows.

Response:

No highway objections subject to conditions.

Summary

We now understand that the site has no extant commercial use, so there is no baseline traffic generation.

Residential use is not expected to result in a significant trip generation on adjacent roads.

In this instance it is likely there would be more vans and trailers/caravans than most residential developments (proportionately) but numbers are too low to raise any concerns.

The gates are set back approximately 2/3 metres from edge of carriageway and open inwards.

The access is in poor condition and not effectively bound material.

It is acknowledged that the speed limit adjacent to the site is 60mph.

The precise visibility needed at the access has not been determined, but actual speeds are not anticipated to be high due to the width, forward visibility and curvature of the highway.

The site frontage is extensive, and the access is on the outside of a bend. Greater visibility could therefore be achieved and should be conditioned as needed.

The site is around 600m from the nearest bus route and substantial residential development.

No cycle or electric vehicle charging provision is proposed.

No detail of refuse management is provided.

Comments:

The application is for what is effectively a small residential development. The site is not ideal in terms of connectivity or sustainability, but not too dissimilar to properties on the periphery of many villages in this respect.

Access is proposed via an established entrance, which is considered to be sub-standard and gated. We would expect to see a bound permeable surface for at least 10m from the highway. Furthermore, gates would not be considered appropriate.

If required by the developer, the gates should be set back to allow vehicles to pull clear of the carriageway. A 5m set back is required for cars but greater set back should be considered for vans /trailers.

We understand now that the lawful land use is not commercial, and no existing traffic generation can be established. We would therefore require the access to be brought up to current standards appropriate to any new use. This should be secured by way of conditions.

The key issue would be visibility. The appropriate visibility should be determined by undertaking a speed survey and finding the 85th percentile wet weather speed for existing traffic.

Estimating forward visibility (from Google maps in the absence of better information) and referencing MfS Figure 7.16 we would predict that the 85th percentile speed is likely to be less than 40mph in the vicinity of the access. This figure is based on empirical data that correlates, speed, forward visibility and road width.

Whilst this is no substitute for surveys it suggests that design speeds will be less than 40mph in both directions. Table 7.1 MfS can therefore be used to determine the necessary "y" distance (when survey data is available).

Without a survey, we can reasonably adopt a figure of 59m (sufficient for 37mph) for the purposes of checking if the visibility is achievable.

Given the extensive frontage, the figure is achievable, and we estimate that up to 90m could be provided.

Furthermore, Manual for Streets 2 is a companion document to MfS and contains further data and guidance. Following analysis of collision data and discussion of the relationship with visibility splays at junctions, it concludes at 10.5.9 that:

"10.5.9 The Y distance should be based on the recommended SSD values. However, based on the research referred to above, unless there is local evidence to the contrary, a reduction in visibility below recommended levels will not necessarily lead to a significant problem."

In essence this means that Y distances should not be considered as absolute and relaxation, based on local circumstances is acceptable. The matter therefore becomes a professional judgement of the individual situation.

We would therefore consider that acceptable visibility splays can be achieved and we would not object to the development on safety grounds, subject to a condition to provide appropriate visibility splays.

This is likely to result in the removal or relocation of some hedge row and associated ecological impact but is achievable from a highway engineering perspective.

We can confirm that the previous highway comments were indeed based on the understanding that the site had extant commercial use and the highway impact was therefore likely to be a positive one, with reduced traffic and commercial flows. We now understand that the site has no lawful commercial use.

SLR suggests that the proposals could generate upwards of 20 trips per day, however it is not known how this has been calculated. As we are not aware of any TRICs data for comparable sites we would rationally compare it to five large households, which would not generate sufficient traffic to require any assessment.

20 plus trips per day seems an overly robust estimate but even then, it is not sufficient to require any assessment in this location. During peak hours, we would anticipate less than 4/5 trips in the hour, which would easily dissipate unnoticed across the highway network. To give some perspective current guidance requires impact assessments for developments generating over 30 trips in a single hour. The proposals are anticipated to generate less than this in a day.

It should be noted that caravans, light commercial vans and trailers are commonplace in residential developments. Whilst they are slightly more onerous than solo cars, they are much less onerous than HGVs. Caravans for example are typically narrower than HGVs (around 2.2m opposed to 2.5), weigh much less (usually between 1-2t) and are more agile. There is no reason to expect caravan movements to be frequent or problematic. The only adjustment we would suggest is that the gates (if any) are set back further to allow trailers to leave the highway when waiting to enter.

Spring Lane has a centre line along its entire length suggesting that it is 5.5m wide and adequate for the vehicle types anticipated. (Based on TSRGD requirements: [Traffic Signs Manual - Chapter 5 - Road Markings](#))

We are unable to confirm if this is accurate for the entire length but recognise that even narrower sections would be acceptable for two-way flows of the magnitude expected here (with or without the development).

We acknowledge the incident involving the refuse collection vehicle; however, this is an isolated incident and in general the lane is more than 5.5m wide. As such it is able to facilitate two HGVs passing along most of its length.

At 7.26 the Rule 6 statement says:

“Additionally, we submit that if the appeal is allowed, a Section 106 Agreement (or Unilateral Undertaking) is required to deliver pedestrian infrastructure in the form of provision of footway heading north on Spring Lane to connect the Site sustainably with Eaves Brow. And furthermore, to fund the adoption of a Traffic Regulation Order to facilitate the erection of warning signs and reduce the speed limit from 60mph to 30mph.”

We do not support the requirement for a footway for the following reasons.

- The distances to any local amenities are such that walking is unlikely to occur with or without a footway.
- There is already adequate footway on New Lane between Eaves Brow and Spring Lane.
- Spring Lane is considered to be a quiet rural lane suitable for walking or cycling.
- There are around 370m of Spring Lane with no footway that is already developed including residential development. This includes the narrowest sections.
- Only around 200m of the link between the site and New Lane is national speed limit and the access is on the outside of a bend which will constrain speeds and enhance visibility.
- There is an existing, albeit potentially less direct and partially lit / partially indirectly lit footway from the site (on the opposite side of the road). It is noted that this does not provide uninterrupted footway to any destination within Croft but does provide an alternative with lower speed limits and lighting which may encourage some road users.

- The alternative route also passes a significant number of properties that are not served by any footway. It does however have a 30-mph limit and lighting where the footway is absent. This would not be a significant detour for most destinations within Croft.
- The footway extends to other residential areas and bus services to the south. Whilst the distances are greater than we would recommend there is connectivity to other amenities.
- Pedestrians have sufficient visibility in both directions to cross to the footway safely from the mouth of the access.
- Crash Map indicates no personal injury collisions involving pedestrians or cyclists in the last 5 (or even 10) years anywhere along either route, suggesting that both routes are quiet and suitable. (There are crashes at the junctions with injuries to vehicle occupants, but these are not frequent, serious or relevant to pedestrian safety). [CrashMap](#)
- Highways do not consider the roads to be notably different to popular leisure routes throughout the country, where walking and cycling are encouraged.
- Other residential properties in the area do not have the benefit of footway, but there is no evidence to suggest this is a safety issue.
- There is not sufficient highway land to provide a footway in a northerly direction.
- The cost of the footway would be prohibitive to any development. It is certainly not proportionate to the scale of these proposals.
- Compulsory purchase and drainage works would make it much more expensive than providing “typical” footway in highway or on the developer’s own land.
- Ultimately the footway would be a maintenance liability for the LHA, with little or no benefit to the public.
- It would not meet the planning condition requirements of reasonable, proportionate or directly related to the development.

We would not oppose a reduction in the speed limit. If proposed it could be considered as a mechanism to reduce the requirements of the visibility splay. In which case it may benefit the development, but we would re-iterate that we consider that appropriate visibility can be achieved without this change.

We consider that the collision record suggests there is no need. We do not anticipate any significant increase in pedestrian or cycle activity for the reasons above and therefore do not anticipate a future need.

Highways consider that the change of speed limit is currently located appropriately where there is a change in the nature of the road. This is also the case for Mill House Lane. They are located at the start of a narrow section that has more frequent access points and more potential for pedestrian and equine activity. This perception of a different road function reinforces the speed limit and encourages compliance. Changing the location could dilute the efficacy of the speed restriction.

In addition, it should be noted that the process to introduce a TRO allows for objection and challenge. As there is no clear safety case it is possible that the Order would not be successful. As it is not within the gift of the developer, we do not consider it to be a reasonable condition.

The conditions requested to upgrade the access will require the applicant to enter into a s278 Agreement. This will involve a review of the design, including checking that the visibility requirements for vehicles and pedestrians are achieved on site. It will also include an independent safety audit. Should any concerns be raised at this stage, additional measures (eg warning signs) will be incorporated into the design, before construction is permitted. (refer to informative notes below).

Residential development is expected to have cycle storage (usually sheds) and electric vehicle charging points. These should be secured by way of condition.

It is not clear how refuse would be managed, a collection point would be needed as collectors do not usually enter unadopted roads without an indemnity, but this can be addressed via a condition.

In summary, the highway authority maintains the stance taken previously but requests an additional condition relating to visibility splays at the entrance.

Suggested Conditions:

1. Before the access is used for vehicular purposes, that part of the access extending from the nearside edge of the highway boundary of Spring Lane for a minimum distance of 10 metres into the site shall be appropriately paved in a bound material such as tarmacadam, concrete, block pavements or other material approved in writing by the Council as Local Planning Authority.

Reason: To prevent loose surface material/debris from being carried on to the public highway thus causing a potential source of danger to other road users in the interests of road safety.

2. Any gate or other form of barrier across the access shall be positioned at least 10 metres back from the nearside edge of the highway boundary of Spring Lane and shall be constructed to open into the site only.

Reason: To permit vehicles to pull clear of the carriageway when entering the site in the interests of road safety.

3. The turning facility shown on the approved plans shall be kept free of all obstructions and shall be available for use at all times.

Reason: In the interests of road safety as vehicles reversing into the highway cause a hazard to other road users.

4. Except for site clearance and remediation no development shall take place until a scheme for the provision of cycle parking in accordance with the Council's current standards has been submitted to and approved in writing by the Council as Local Planning Authority. The scheme shall be implemented as approved before any part of the development is brought into use and shall be retained as such thereafter. Notwithstanding the provisions of the Town and Country Planning Act (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order) no building works, which reduce this provision, shall take place except following the express grant of planning permission by the Council.

Reason: To ensure that adequate provision is made for parking cycles on the site; and to establish measures to encourage non-car modes of transport.

5. Prior to first occupation of the development hereby permitted a domestic servicing and waste management strategy shall be submitted to, and approved in writing by the Council as Local Planning Authority. The strategy shall be subsequently implemented in accordance with the approved details.

Reason: To ensure that adequate on-site provision is made for domestic servicing and waste management collection including allowance for the storage, transfer and collection of domestic waste to reduce impact on residential amenity and the general amenity of surrounding occupiers.

6. A scheme for the provision of electric vehicle charging points, or passive provision, shall be submitted to and agreed in writing with the Local Planning Authority. The agreed scheme shall be provided prior to first occupation of each unit and retained as such thereafter.

Reason: To ensure that appropriate provision for current and future electric and electric/hybrid vehicles and encourage more sustainable means of transport.

7. No part of the development shall be brought into use until visibility splays compliant with current guidance and measured as described in Section 7.7 of Manual for Streets (DfT, DCLG, Welsh Assembly, 2007) have been provided at the proposed junction with Spring Lane. The splays shall be provided clear of obstruction to visibility to visibility exceeding 600mm in height above verge level. Once created, the visibility splays shall be maintained clear of any obstruction and shall be retained at all times.

Informatives:

1. The applicant is reminded that it is an offence to allow material to be carried from the site and deposited on or cause damage to the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and will prosecute persistent offenders under Sections 131, 148 & 149 of the Highways Act 1980.
2. It is an offence to carry out any works within the public highway without permission of the Highway Authority. The grant of planning permission will require the applicant to enter into a S278 Agreement with the Council as Highway Authority. The applicant is advised to contact the Council's Traffic Management, Road Safety & Adoptions Team on 01925 443248 to ascertain the details of such an agreement and the information to be provided. For the avoidance of doubt all works shall be carried out at nil cost to the Council.

Kevin Jackson
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