

Our Reference: 081241.100-CUR-00-XX-RP-TP-0004-V01\_Highway Response

4<sup>th</sup> April 2023

Dean Clapworthy  
Case Officer  
Bury Council  
Town Hall  
Knowsley Street  
Bury  
Lancashire  
BL9 0SW

## Re: Spurr House, Pole Lane, Bury, BL9 8QL. LPA Reference 69361. Post Submission Highway Response 1

Dear Dean,

Thank you for passing on your recent comments, and those of your colleagues in the Highway Development Control Team and Transport for Greater Manchester (TfGM), regarding the Spurr House scheme at Pole Lane in Bury. Curtins has reviewed the correspondence carefully with the Project Design Team and has prepared this short letter which seeks to address the points raised.

The comments from Bury Council (BC) received via email dated 2<sup>nd</sup> March 2023 relate to the proposed site access; including the gate provision, visibility requirements and vehicle tracking, and the proposed parking provision for both cars and cyclists. The comments from TfGM were received via email dated 23<sup>rd</sup> March 2023 (TfGM reference TRA/23/068) and, whilst they confirmed agreement with many of the transport elements captured in the Transport Statement and Travel Plan, they raised similar points to those in BC's correspondence. Notwithstanding, any additional comments made by TfGM have been duly considered and addressed in the following subsections.

### **Proposed Site Access**

In considering comments from BC relating to the positioning of the proposed access gate and the site fencing (which had the potential to impact upon the emerging visibility splays) the proposed site access has been amended and reference should be made to **Curtins Drawing 081241-CUR-00-XX-DR-TP-75001** appended to the rear of this letter. As shown on the Drawing the access has been amended so that the gate is no longer positioned in a manner that encroaches on the available carriageway width across the access bellmouth (maximising maneuvering space for ingress and egress).

Following discussions with the Design Team, having a secure access gate was seen as a key element of the design for out of hours/overnight security and to prevent any potential anti-social behaviors from occurring. Notwithstanding, the access gate will be opened by staff early in the morning and remain open during the school's operation so that vehicles can enter/exit Pole Lane without having to wait for the gate to open (the timings could be captured via a suitably worded planning condition). The gates can be opened fully and hinged back at c.180 degrees so that they do not impact on any internal car parking maneuvering space. **Curtins Drawing 081241-CUR-00-XX-DR-TP-05003** demonstrates that when the staff member first arrives on site in their car to unlock the school, they can safely wait in front of the gate off the mainline flow along Pole Lane.

The proposed site fence line has been amended in light of the comments received and as shown on **Curtins Drawing 081241-CUR-00-XX-DR-TP-75001** visibility splays in accordance with the prevailing standards found within the Department for Transport's ('DfT') Manual for Streets ('MfS') Guidance (2.4m x 43m) can be achievable from the site access on Pole Lane. This drawing has been based on topographical information provided by the Project Architect (AHR) with additional details removed for clarity.

Curtins has updated the swept path assessment on the proposed car park considering the revised site access arrangement to ensure that it can continue to be suitably accessed by servicing, delivery, emergency and minibus vehicles should this be necessary. Reference should be made to **Curtins Drawings 081241-CUR-00-XX-DR-TP-05001** and **081241-CUR-00-XX-DR-TP-05002** which details a large refuse vehicle and minibus entering the site from Pole Lane in all directions (as requested in BC's comments).

TfGM's suggestion to implement tactile paving and dropped kerbs at the car park access is reasonable and the access has been updated to show this provision (Please see **Curtins Drawing 081241-CUR-00-XX-DR-TP-75001**).

### **Proposed Car Parking Provision**

As detailed in the Transport Statement a total of 23 car parking spaces, including one accessible bay and 2 EV charging bays, were proposed on-site. The proposed car parking is supported by two additional minibuss parking bays. Following on from the planning submission, and based off comments received from BC's Planning Officer, the layout has been updated to include an additional motorcycle parking space.

It remains Curtins' view that the above represents an appropriate car park for the scale, nature, and location of the proposed educational facility. Due to the specialist 'Pupil Referral' nature of the site, the school has been heavily involved throughout the design process and has a good understanding of their requirements for car parking at their existing Spring Lane site, which has informed the design of the Spurr House proposals. Notwithstanding the above, additional justification for the proposed car parking provision is provided in the following paragraphs.

### **Policy**

The current car parking standards for the Bury are outlined in the Development Control Policy Guidance Note 11 – 'Parking Standards in Bury' dated 2007. The guidance states that for Class D1 Non-Residential Institutions - Schools, the following maximum standards apply:

- 1.5 space per classroom.

Due to the specialist 'Pupil Referral' nature of the site, the parking standards should be treated with a degree of flexibility as the school may operate differently to other facilities in this category. Curtins understands that the site proposals currently include 13 general classrooms and 5 additional vocational spaces/classrooms, which will vary in terms of their usage. Depending on how this vocational teaching space is treated in terms of the Council's application of the car parking policy it would permit in the region of c20 – 27 spaces on site (in broad accordance with the 23 spaces currently proposed). It is considered therefore that the scheme is policy compliant in terms of car parking.

### **Sustainable Transport Options**

The accessibility of the site by sustainable modes of travel is assessed in greater detail within Section 4 of the Transport Statement. However, it should be re-iterated that the site is in a sustainable location and as such the dependence on accessing the site by car is lower. The proposed development is near the residential areas of Whitefield, whereby prospective site users could readily access the site on foot. Many of the roads local to the site are subject to 20mph speed limits and therefore considered conducive to cycling. West of the site, the A56 Manchester Road has on-carriageway cycle lanes, as well as signalised toucan crossings points. The following destinations (amongst many others) can be reached within an accessible cycle to/from the site:

- Bury Town Centre
- Whitefield
- Radcliffe
- Prestwich
- Cheetham Hill
- Broughton
- Heywood

The above locations cover a significant catchment for prospective site users who may choose to cycle to/from the site. The revised site layout has been updated and now includes an expanded secure cycle shelter on site (discussed in greater detail below).

The nearest bus stops to the site are located approximately 250m away on Parr Lane. The existing bus stop infrastructure includes shelters, seating and timetable information, with the northbound stop also including raised kerbs. These stops provide three services per hour between Manchester and Bury, stopping at useful destinations on route and representing an excellent and viable option for prospective site users. In addition to the public transport services the school provides learner transport for their pupils. These vehicles will utilise the car park and minibus parking spaces within the school site.

In summary, considering the site on its own merits and not assessing accessibility against the current facility which is no longer fit for purpose, the site is located such as to sufficiently benefit from existing walking, cycling and public transport opportunities in the context of Local and National Planning Policy. The site is located in close proximity to a variety of key services and facilities as well as a number of pre-existing residential areas. The site is therefore considered to be accessible from sustainable modes of travel and this is reflected in the proposed car parking provisions.

#### Changes in Travel Behaviour

Understanding future demand for road travel is essential in assessing transport impacts of new developments and the potential investments that will need to be made. However, forecasting future demand is challenging and there remains uncertainty about the extent to which existing travel trends will carry on into the future. It is important therefore to ensure that the latest transport (and societal) trends are understood to minimise this uncertainty.

It is important that site masterplanning is mindful of changes in travel behaviour so that their assumptions concerning travel demand (and parking), which are then carried through in Transport Assessments, are appropriate and relevant to the development that they are supporting.

In light of the above, recent documentation has been produced by several transport research bodies which suggests that private car use and ownership is declining and there is a more positive shift in the way of alternative, more sustainable, modes of travel. This documentation has been summarised in the below subsections.

#### *All Change?*

The First Report of the Commission on Travel Demand entitled 'All Change? The future of travel demand and the implications for policy and planning ("All Change")' was published in May 2018. This report, developed through a long process of evidence gathering across the UK, offers a positive perspective on the future of travel demand.

The report demonstrates that the evidence of previous transport planning, based on growing car ownership and use, is now limited and sometimes wrong (this point is also recognised in the Department for Transport Road Traffic Forecast Report - RTF18).

Evidence in All Change shows that people generally make 16% fewer trips than in 1996, travel 10% fewer miles than in 2002 and spend 22 hours less time travelling than in 2008. This shift is associated with societal shifts in how we work and shop; changing demographics; shifts in income across the population; as well as increased urbanisation. All of these changes are underpinned by and connected to the rise in internet and communication technologies.

The report identifies a number of trends that should be considered in the development planning process. These are identified as follows:

- Commuting patterns (employees working from home and not having fixed place of work/hours);
- Age/Gender (fewer young drivers);
- Socio-economic conditions (decline in home ownership and wage stagnation);
- Geographic differences (expansion of urban areas);
- Changing transport technologies (increase in shared mobility);
- Walking/cycling (uptake in cycling and walking activity); and,
- Bus and Rail travel (increase in patronage).

### *National Travel Survey Report 2016*

Additional evidence of changes in travel behaviour can be found in report of The National Travel Survey (NTS) 2016. The travel survey indicated that the total distance travelled per person per year has fallen by 9% between 2007 and 2016. Distance by all motorised private transport has fallen by 13% since 2003, and as a car driver by 10% since 2007. Miles travelled by surface rail have almost doubled since 1985.

### *TRICS Survey Data*

TRICS has also undertaken research into changes in travel patterns/trends. TRICS is an industry-standard software tool which comprises a large database of traffic surveys of existing developments, across the UK and Ireland, sub categorised into particular land uses.

This process has demonstrated that there has been a decline in car trip rates recorded in TRICS across the time period from 1994-1998. When comparing with the NTS 2002-2017 the TRICS data shows trip rates have declined by 9%. Such differences reflect the changing nature of work and modes of travel but are significant for individual site assessments and determining parking requirements at forthcoming sites.

What is not clear is whether the total vehicle trip reduction is as a result of site-specific measures, reduction in car parking provision or site-specific design. The increase in pedestrian trips and public transport trips has positive implications for planning sustainable transport sites.

### *Conclusion*

The evidence provided by All Change, DfT's RTF 18, NTS and TRICS demonstrates that there has been a sustained change in travel behaviour in recent years. This change is reflected in the trip rates for different site uses. Therefore, care needs to be taken to ensure that the design of developments take account of these changes in travel behaviour.

If no recognition is given to trends shown in the research, there runs the risk that transport planning will provide infrastructure that meets previous predicted needs rather than the transport needs of the future, and potentially results in stranded or underutilised assets.

It seems reasonable to assume that trip rates, in particular vehicle trip rates in urban areas could become lower or plateau at current rates, and this should be taken into consideration when determining parking provision in coming years.

### Travel Plan

The Spurr House site when operational will be supported by a robust Travel Plan. An Interim Travel Plan (ITP) document was produced by Curtins as part of the planning application (Curtins Document Reference 081241.100-CUR-00-XX-RP-TP-0003) which sets out a series of potential measures and initiatives developed to encourage sustainable travel at the site. A key aim of the Travel Plan is to reduce future site users' dependency on the private car and in turn this will decrease demand for any car parking on site. Reference should be made to the ITP for further information on the proposed Travel Planning measures.

### Car Park Management Measures

The correspondence from TfGM suggested it may be beneficial for a review to be undertaken of the Traffic Regulation Orders (TROs) in the vicinity of the development, with a view to introducing additional parking restrictions along Pole Lane. This will help to discourage any potential pavement parking in the vicinity of the development. It is Curtins view that consideration of a new scheme of TROs could be captured and investigated as part of a suitably worded planning condition.

In addition to a potential scheme of TROs in the vicinity of the site, and in order to ensure that the car park operates efficiently during normal day to day operations, it is proposed that the car park will be managed in the following way:

## Bury Council Post Submission Highway Response 1

- The car park will be open over the same period as the school's operation. Parking outside of these hours (without the required permission) will not be allowed and will be enforced by the secure access gate.
- The car park will be for staff, minibuses and servicing. Standard parking bays at the facility will not be reserved to specific users – unless as part of any future Travel Planning initiatives (such as car sharing).
- Staff will be required to park within marked bays to maximise the available capacity whilst providing space for manoeuvres.
- All staff who drive to the site will be encouraged to park their vehicles within the car park, rather than on local roads.
- Staff will not be permitted to use the car park for anything other than parking of private vehicles.
- Staff will continue to be encouraged to use sustainable modes of transport when viable, including public transport, car sharing, cycling and walking, as part of the initiatives found within the Travel Plan (Curtins Document Reference 081241.100-CUR-00-XX-RP-TP-0003).
- As part of the ongoing Travel Plan monitoring process, the operation of the proposed car park will be continually reviewed, to ensure that a coordinated approach is applied. Future initiatives will be representative of how the car park is operating on-site and tailored to ensure they meet the specific needs of the development.
- For example, if future demand arises, car share priority parking bays will be identified and marked out to encourage greater levels of car sharing.
- The school will continue to maintain the car park, as required, to include lighting, signage, repairs to the gate and general car park repairs including white lining and any superficial repairs – to ensure that the car park operates as efficiently as possible.

Car Parking Conclusions

The analyses presented above provides compelling evidence that the level of car parking that is proposed on site is appropriate for the scale, nature and location of the proposed development, as well as complying with BC's parking policy requirements. Notwithstanding the above, as part of ongoing Travel Planning measures at the site, the school is committed to the continual review of the car park to ensure that it is operating in a safe and efficient manner. Furthermore, the level of cycle parking proposed on site has been enhanced following comments from BC, with a view to encouraging a greater modal shift. This is discussed in the following subsection.

Proposed Cycle Parking Provision

The current cycle parking standards for the Bury are outlined in the Development Control Policy Guidance Note 11 – 'Parking Standards in Bury' dated 2007. The requirements for cycle parking are set out as minimum values and are as follows:

- 1 space per 10 full time staff, plus 1 space per 10 pupils.

Based on anticipated staff and pupil numbers the site would require a minimum of 11 cycle parking spaces. Following comments from BC, the cycle parking provision has been enhanced and extended from that shown on the planning submission layout. The secure shelter now includes space for 22 bicycles, and therefore well in excess of BC's minimum requirements, with the intention to promote sustainable travel to/from the site in line with the Travel Planning objectives. The shelter has also been re-positioned to provide better access and increased surveillance from the building footprint.

Summary

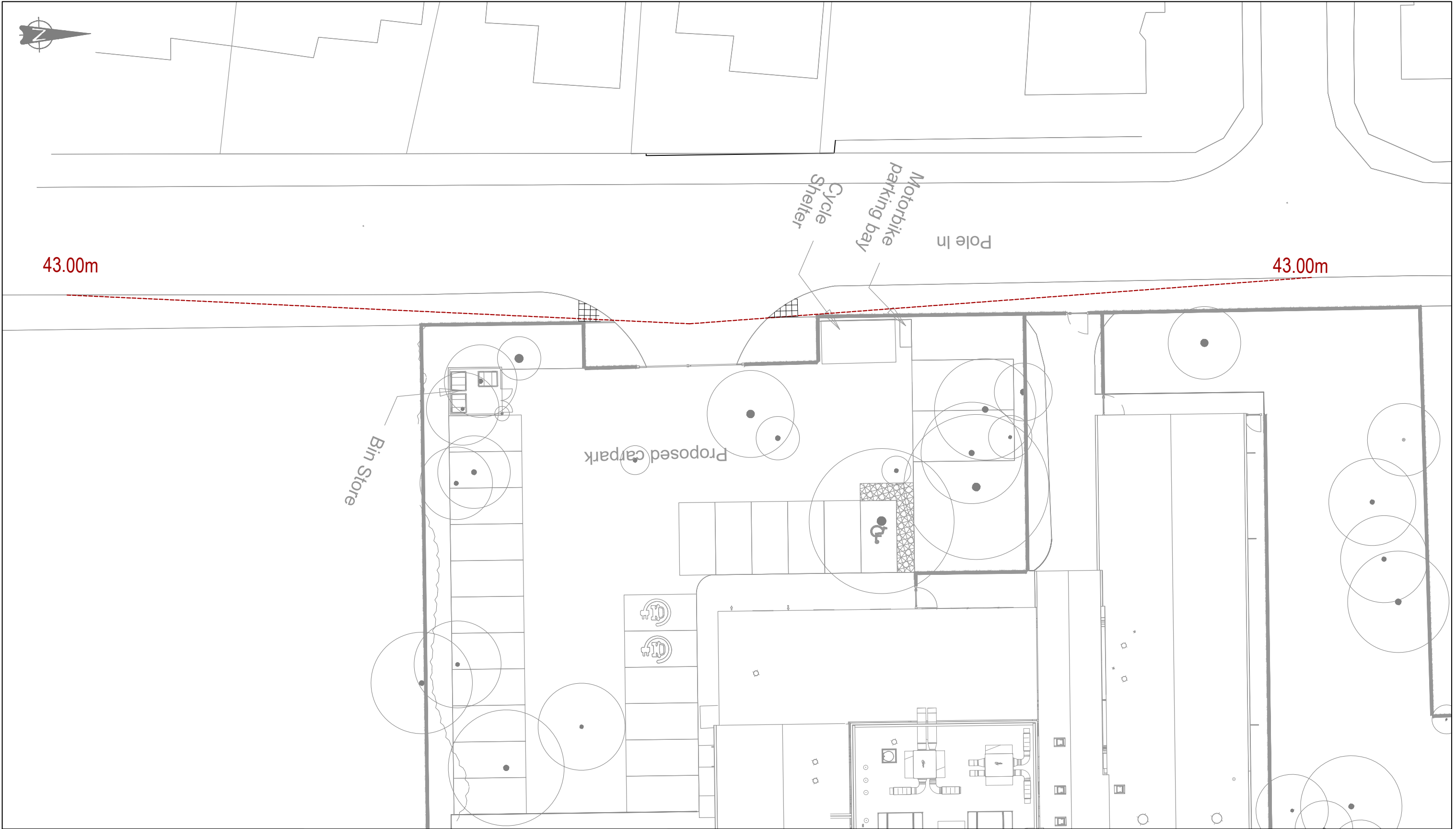
Curtins considers the above information to be sufficient to address and alleviate any concerns raised by BC and TfGM Officers. However, we would welcome any further views, and would be happy to liaise further with the Local Highway Authority to provide additional information and clarity as required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Ashcroft'.

Jonathan Ashcroft  
**Principal Transport Planner**  
For and on behalf of **Curtins**  
**Enc: Terms and Conditions**

## Drawings



KEY:  
-240 x 43.00m- PROPOSED VISIBILITY SPLAYS (30mph)

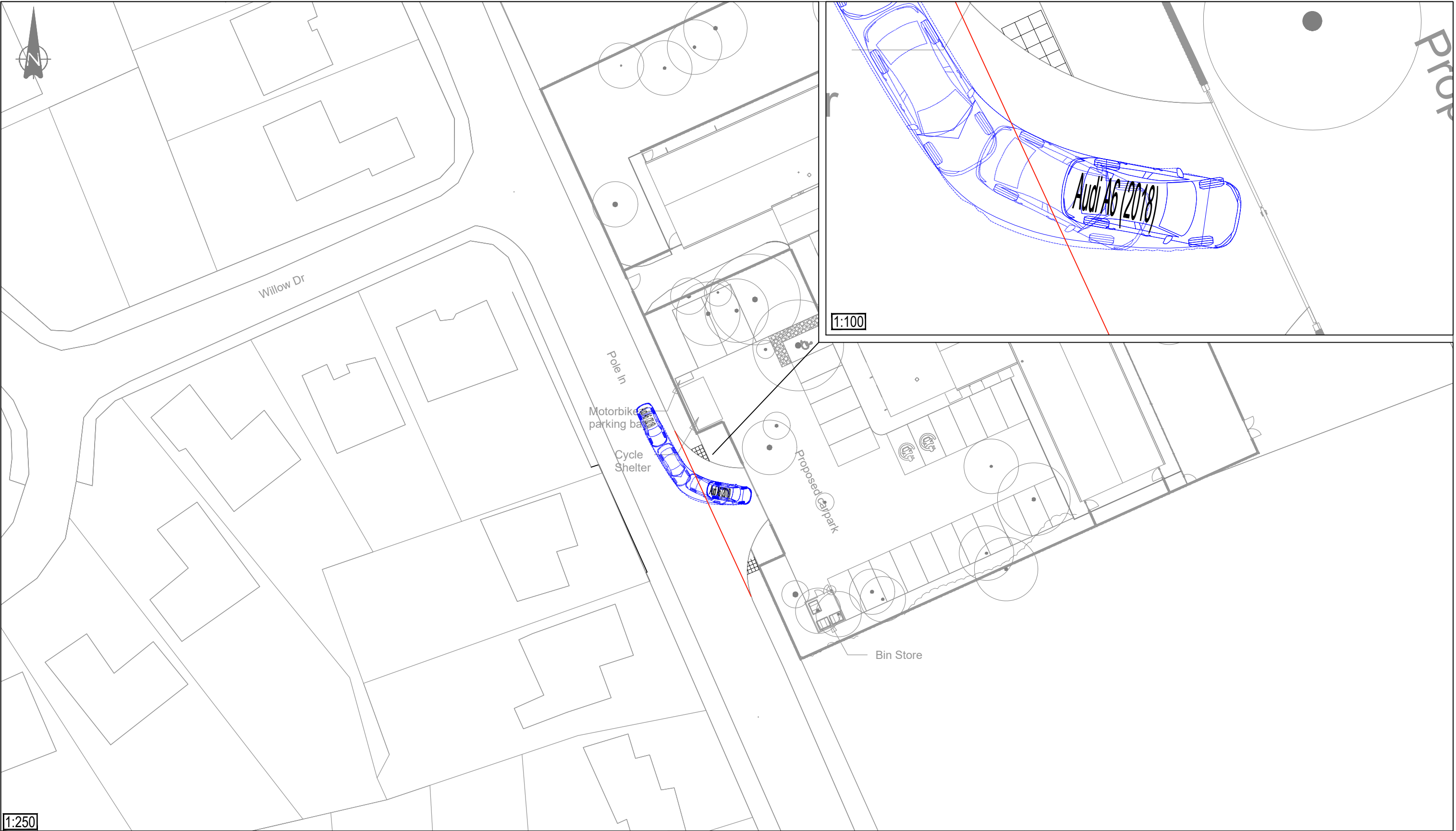
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|----------------|------|----------------|----------|-----|-------|
|                | P06  | UPDATED LAYOUT | 03/04/23 | HD  | JA    |
|                | P05  | UPDATED LAYOUT | 03/04/23 | HD  | JA    |
|                | P04  | UPDATED LAYOUT | 10/01/23 | HD  | JA    |
|                | P03  | UPDATED LAYOUT | 22/12/22 | HD  | JA    |
|                | P02  | UPDATED LAYOUT | 14/12/22 | HD  | JA    |
|                | Rev: | Description:   | Date:    | By: | Chkd: |
| GENERAL NOTES: |      |                |          |     |       |

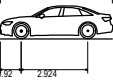


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|                                                |  |             |         |                     |       |                |                    |      |
|------------------------------------------------|--|-------------|---------|---------------------|-------|----------------|--------------------|------|
| Project: SPURR HOUSE, BURY                     |  |             |         | Status: PRELIMINARY |       |                |                    |      |
| Drg Title: VISIBILITY SPLAYS                   |  |             |         | Drawn By: HD        |       | Checked By: JA |                    |      |
|                                                |  |             |         | Designed By: HD     |       | Date: 07/11/22 |                    |      |
|                                                |  |             |         | Scale: 1:500        |       |                |                    |      |
| Project No:                                    |  | Originator: | Volume: | Level:              | Type: | Role:          | Category / Number: | Rev: |
| 081241 - CUR - 00 - XX - DR - TP - 75001 - P06 |  |             |         |                     |       |                |                    |      |





Audi A6 (2018)  
Overall Length 4.939m  
Overall Width 2.114m  
Overall Body Height 1.457m  
Min Body Ground Clearance 0.142m  
Max Track Width 1.875m  
Lock to lock time 4.00s  
Kerb to Kerb Turning Radius 5.950m

|      |                |          |     |       |
|------|----------------|----------|-----|-------|
| P04  | UPDATED LAYOUT | 04/04/23 | HD  | JA    |
| P03  | UPDATED LAYOUT | 10/01/23 | HD  | JA    |
| P02  | UPDATED LAYOUT | 22/12/22 | HD  | JA    |
| Rev: | Description:   | Date:    | By: | Chkd: |



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Project: SPURR HOUSE, BURY

Drg Title: SWEPT PATH ANALYSIS  
LARGE CAR

Status: PRELIMINARY

Drawn By: HD  
Checked By: JA

Designed By: HD  
Date: 14/12/22

Scale: 1:250

Project No: 081241 - CUR - 00 - XX - DR - TP - 05003 - P04

Originator: TP081241.100 - Spurr House, BuryQ4-Production\4A-Models-Drawings\TPCAD1051

Volume: 081241 - CUR - 00 - XX - DR - TP - 05003 - P04

Level: 081241 - CUR - 00 - XX - DR - TP - 05003 - P04

Type: 081241 - CUR - 00 - XX - DR - TP - 05003 - P04

Role: 081241 - CUR - 00 - XX - DR - TP - 05003 - P04

Category / Number: 081241 - CUR - 00 - XX - DR - TP - 05003 - P04

Rev: 081241 - CUR - 00 - XX - DR - TP - 05003 - P04



Phoenix 2 Duo (P2-15W with Elite 6x4 chassis)

|                             |         |
|-----------------------------|---------|
| Overall Length              | 11.200m |
| Overall Width               | 2.530m  |
| Overall Body Height         | 3.751m  |
| Min Body Ground Clearance   | 0.304m  |
| Track Width                 | 2.500m  |
| Lock to lock time           | 4.00s   |
| Kerb to Kerb Turning Radius | 9.500m  |

GENERAL NOTES:

|      |                |          |     |       |
|------|----------------|----------|-----|-------|
| P06  | UPDATED LAYOUT | 03/04/23 | HD  | JA    |
| P05  | UPDATED LAYOUT | 03/04/23 | HD  | JA    |
| P04  | UPDATED LAYOUT | 10/01/23 | HD  | JA    |
| P03  | UPDATED LAYOUT | 22/12/22 | HD  | DJ    |
| P02  | UPDATED LAYOUT | 14/12/22 | HD  | JA    |
| Rev: | Description:   | Date:    | By: | Chkd: |

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Project: SPURR HOUSE, BURY

Drg Title: SWEPT PATH ANALYSIS  
11.2m REFUSE

Status: PRELIMINARY

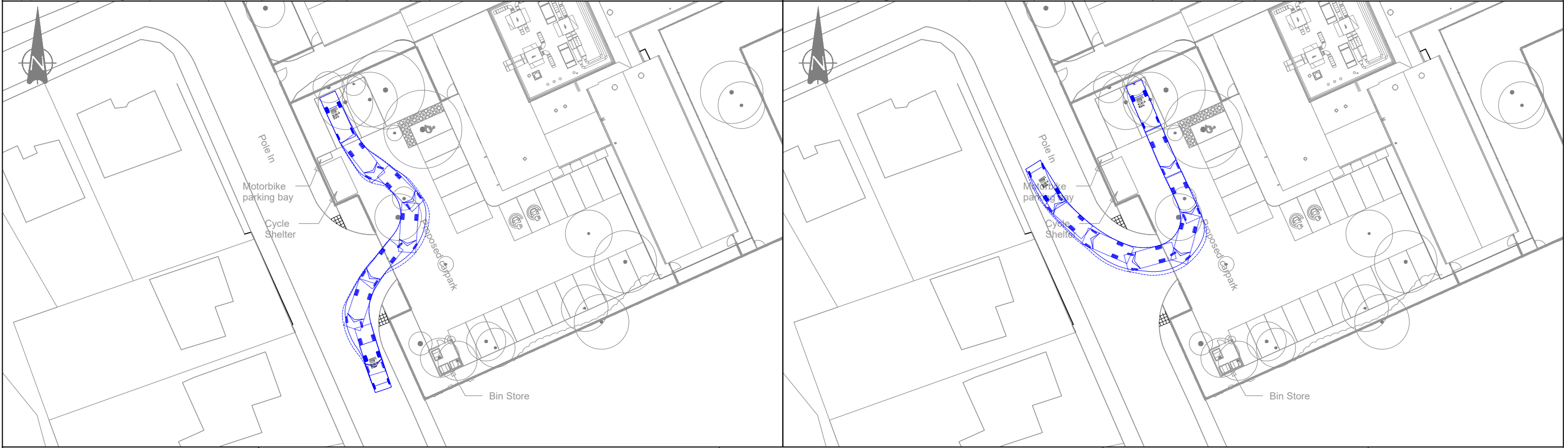
Drawn By: HDChecked By: JA

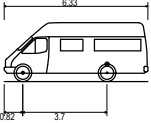
Designed By: HDDate: 07/11/22

Scale: 1:250

Project No: Originator: Volume: Level: Type: Role: Category / Number: Rev:

081241 - CUR - 00 - XX - DR - TP - 05001 - P06





|                             |        |
|-----------------------------|--------|
| Mini Bus                    | 6.330m |
| Overall Length              | 2.192m |
| Overall Width               | 2.601m |
| Overall Body Height         | 0.374m |
| Min Body Ground Clearance   | 2.192m |
| Track Width                 | 4.008m |
| Lock to lock time           | 6.450m |
| Kerb to Kerb Turning Radius |        |

|     |                |          |    |    |
|-----|----------------|----------|----|----|
| P05 | UPDATED LAYOUT | 03/04/23 | HD | JA |
| P04 | UPDATED LAYOUT | 03/04/23 | HD | JA |
| P03 | UPDATED LAYOUT | 10/01/23 | HD | JA |
| P02 | UPDATED LAYOUT | 22/12/22 | HD | JA |



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|                                         |             |                     |                |
|-----------------------------------------|-------------|---------------------|----------------|
| Project: SPURR HOUSE, BURY              |             | Status: PRELIMINARY |                |
| Drg Title: SWEPT PATH ANALYSIS MINI-BUS |             | Drawn By: HD        | Checked By: JA |
|                                         |             | Designed By: HD     | Date: 14/12/22 |
|                                         |             | Scale: 1:500        |                |
| Project No:                             | Originator: | Volume:             | Level:         |
| Type:                                   | Role:       | Category / Number:  |                |
| 081241 - CUR - 00 - XX - DR - TP -      |             | 05002 - P05         |                |

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