

Strategic Land Group

**Henthorn Road,
Clitheroe**

Planning Statement

December 2012

Ref: 2012-156-005a

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Authorised for and on behalf NJL Consulting LLP



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Partner

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1.0 Non-Technical Summary

- 1.1 This Planning Statement has been prepared by NJL Consulting LLP (NJL) on behalf of the Strategic Land Group (SLG) to support an Outline planning application for the construction of up to 140 new homes on land off Henthorn Road, Clitheroe.
- 1.2 A suite of technical reports have been submitted in support of this application to assess the potential impacts of development.
- 1.3 The supporting technical reports identify no impacts which would significantly outweigh the benefits of development. The proposed site is therefore identified as the preferred and logical location for a new development within Clitheroe. Housing in this location will deliver tangible benefits to the town centre and local communities with no major environmental or over-riding constraints.
- 1.4 A number of benefits can be attributed to the scheme and can be summarised as follows:
- The scheme will help contribute to Ribble Valley Borough Council housing supply issues and will help to ensure they have a robust 5 year supply;
 - A deliverable site that is ready to come forward;
 - Contribution to affordable housing;
 - Sustainably located;
 - New public open space and green infrastructure
 - Contribution to Economic Sustainable Development supporting local amenities;
 - New Homes Bonus contribution of approximately £1million according to the DCLG calculator tool; and
 - Planning gain contributions through an agreed Section 106 Agreement.
- 1.5 The proposed development is socially, economically and environmentally sustainable meaning planning permission should therefore be granted.

2.0 Introduction

- 2.1 This Planning Statement has been prepared by NJL Consulting on behalf of Strategic Land Group (SLG) in support of an Outline Application for the residential development off land at Henthorn Road, Clitheroe.
- 2.2 The application seeks outline planning permission for residential development and access, but with all other matters reserved. The proposals will, however, be controlled by parameters. As such, the submission includes fixed maximum parameters for certain key elements of the scheme which will be adhered to in subsequent reserved matters applications. This is an established approach to schemes where core principles can be set in the first instance and thereafter detailed design developed. The approach enables the Local Planning Authority to maintain control over detailed design works of all elements of the scheme, and consultees to be fully engaged throughout the application process, providing them the flexibility to influence the development and create a beneficial scheme for all.
- 2.3 This Statement intends to summarise the nature of the site and the proposed development, its compliance with local and national planning policy, and the need for the development proposed.
- 2.4 Also submitted in support of this application are:
- Design & Access Statement prepared by NJL Consulting LLP (Ref: 2012-156-011)
 - Ecological Survey Report prepared by RSK (Ref: 854465)
 - Flood Risk And Drainage Assessment prepared by RSK (Ref: 880291 R1 (1))
 - Topographical Survey prepared by Powers Tilman (Ref: 6447/01)
 - Preliminary Risk Assessment prepared by RSK (Ref: 321124)
 - Arboricultural Constraints Appraisal prepared by Bowland Tree Consultancy Ltd (BTC338)
 - Archaeological Report prepared by Wardell Armstrong (Ref:ST13131)
 - Agricultural Land Survey prepared by Land Research Associates (Ref: 775/1)
 - Transport Assessment prepared by Crofts Transport Solutions (Ref:0248)

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- Landscape and Visual Impact Assessment prepared by TPM Landscapes (Ref: October 2012)
 - Carbon Reduction Report prepared by NJL Consulting LLP (2012-156-007a)
 - Draft S106 Agreement prepared by Waggle & Co.

2.5 The following drawings have also been submitted in support of the application:

- Henthorn Road Landscape Framework Plan prepared by TPM Landscape

3.0 The Site And Its Surroundings

The Site

- 3.1 The site is located to the south west of Clitheroe Town Centre, as identified in Figure 1. The total site area is approximately 4.97 Ha, consisting of open fields.
- 3.2 The site is bounded to the north by Henthorn Road where access is to be gained; agricultural land is present on land beyond Henthorn Road. Planning permission has recently been granted for residential development on this area. To the east is an existing residential housing estate (circa 1960-70's) that the new development will abut to. To the west and south of the site benefits from open fields, primarily used for agricultural purposes.



Figure 1: Site Location

Surrounding Uses

- 3.3 Clitheroe is an ancient market town that sits in the heart of the Ribble Valley. It is approximately one mile from the Forest of Bowland, an Area of Outstanding Natural Beauty (AONB), providing Clitheroe with a flourishing tourist economy.
- 3.4 The centre of Clitheroe offers a historic regional market, a variety of boutique shops, museums and the main focal point; Clitheroe Castle. The town has recently seen a resurgence in visitor numbers, with the subsequent effect of a thriving community scene, due in part to the facilities on offer and location.

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- 3.5 Clitheroe is located to the north of Manchester and to the west of the central Lancashire conurbation. Access is good from the M65 and A59. The proposed site is located to the south of Clitheroe centre, providing direct access into Clitheroe along Henthorn Road and onto the B643, or further afield via the A671, which joins the A59 and onto the M65.
- 3.6 There are a selection of supermarkets less than a mile from the proposed site and a wide range of facilities that can service the residents of any new development.
- 3.7 A recent consent for a residential scheme has been granted on land opposite the site on Henthorn Road that includes a new Doctors Surgery to serve the local community.

Planning History

- 3.8 The site is agricultural land and subsequently does not have a complex planning history.
- 3.9 In March 2012 a scheme adjacent to the proposed site went to appeal (Henthorn Road [2161186]) and was allowed with planning permission granted for an outline application for up to 270 residential dwellings, a doctor's surgery, landscape, open space, highways and associated works. A Reserved Matters application has not currently come forward for this site and the land is currently undeveloped.

4.0 The Proposed Development

- 4.1 This planning application seeks Outline Consent for up to 140 houses.
- 4.2 The details of the development proposals will be determined as part of a subsequent Reserved Matters application. However the supporting Design and access Statement (DAS) identifies that the development will include a range of homes of a variety of storey heights.
- 4.3 Vehicular access to the proposed housing development will be taken from Henthorn Road. The access roads will link to a series of internal estate roads enabling navigation through the site.
- 4.4 A Local Area for Play (LAP) is proposed on site to provide open space and play facilities for residents. In addition to this public footpaths will link to the 'community park' that has been approved as part of the consented development scheme adjacent to the proposed site. The actual amount of public open space (and LAP) will be determined at the Reserved Matter stage through the detailed Masterplan.
- 4.5 Tree planting throughout the site has been proposed to enhance the residential environment and screen adjoining private gardens, a detailed landscape and management plan will be provided at the Reserved Matters stage.
- 4.6 A draft S106 agreement has been submitted in support of the application. This proposes the following contributions subject to their need being demonstrated:
- 30% Affordable Housing Contribution – 37.5% of which will be intermediate rent and 62.5% shared ownership.
 - Wheeled Bin Contribution of £90.00 per residential unit.
 - Education Contribution – if required
 - Public Transport Contribution – if required

Key Benefits

- 4.7 There are a number of key benefits that will be accrued through the delivery of this residential development. In this context it is important to consider the record of persistent under delivery of housing within the Ribble Valley Borough.
- 4.8 The key benefits of the scheme can be summarised as follows:

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- The scheme will help contribute to Ribble Valley Borough Council housing supply issues and will help to ensure they have a robust 5 year supply;
 - A deliverable site that is ready to come forward;
 - Contribution to affordable housing;
 - Sustainably located;
 - New public open space and green infrastructure
 - Contribution to Economic Sustainable Development supporting local amenities;
 - New Homes Bonus contribution of approximately £1million according to the DCLG calculator tool; and
 - Planning gain contributions through an agreed Section 106 Agreement.

5.0 The National Planning Policy Framework

General Aims

5.1 The National Planning Policy Framework was introduced by the Government in March 2012. It was intended to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth.

5.2 The Framework was not intended to be a fundamental over-haul of the planning system; instead it was an attempt at summarising and streamlining existing guidance so that the aims of the planning system were clear.

5.3 This central aims are summarised in the Ministerial foreword of the Framework:

‘The purpose of planning is to help achieve sustainable development.’

5.4 Where proposals are sustainable the Ministerial foreword is clear:

‘Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision.’

5.5 The Ministerial foreword is also clear as to how the planning system can help achieve sustainable development:

‘[P]lanning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.’

5.6 The Framework, taken as whole, represents the Government’s definition of what constitutes a sustainable development. This definition of sustainable development includes three key roles: an economic role; a social role; and an environmental role. These aims are mutually dependent and should be sought jointly and simultaneously by the planning system.

Delivering Housing

5.7 Part of the social dimension of sustainable development is to provide the supply of housing that is required to meet the needs of present and future generations. The Framework goes so far as to state that local planning authorities should look to *‘boost significantly the supply of housing.’*

A Sustainable Development

- 5.8 Sections 7, 8 and 9 of this Statement consider each of the three main strands of sustainable development in turn, using the broad headings in paragraph 7 of the Framework, and explain how the development proposals meet those requirements. At the same time reference will be made to relevant local planning policies, to show how the proposals also comply with them, and to the supporting technical reports. Appendix 1 of this report includes a detailed schedule of each policy of the development plan, along with an explanation of compliance.

6.0 The Case for Development

The Housing Land Position

- 6.1 Following the adoption of the Framework, in order to significantly boost the supply of housing LPAs are required to *'identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements.'* In order to ensure choice and competition in the land market, a buffer of 5% should be allowed in addition to this target, increasing to 20% where there is a *'record of persistent under delivery.'* In the event that an adequate supply of housing land cannot be demonstrated, *'relevant policies for the supply of housing should not be considered up-to-date.'* This is a re-affirmation of the position for housing supply as set out in Planning Policy Guidance Note 3, which was superseded by the Framework.
- 6.2 NJL Consulting has prepared a separate **Housing Land Supply Analysis Report** which assesses the current position in the Ribble Valley. The most recent data made publicly available by Ribble Valley on the housing land position is the Housing Land Availability Schedule published on the in October 2012. A total of 1,414 dwellings on a number of sites are identified within the report, including sites subject to Section 106 agreements, affordable units, site with planning permission (outline and full) and sites under construction.
- 6.3 The Ribble Valley assessment then compares this supply against two potential housing targets; the first is the target from the Regional Spatial Strategy (RSS) (161 dwellings per annum) while the second is the target in the submitted Core Strategy (200 dwellings per annum). According to Ribble Valley's assessment, the housing supply equates to a 6.0 years for the RSS option and 5.0 years for the submitted Core Strategy option.
- 6.4 The recent appeal decision in relation to the Gladman Developments site on Henthorn Road has identified that evidence exists that the actual housing target could be as high as 330 to 250 dwellings per annum. On the basis, the Inspector concluded that the housing target should be considered to be 200dpa as a minimum. That figure was therefore used as the basis for the review.

- 6.5 The housing target as assessed by the Ribble Valley includes an allowance for a 20% buffer. This is because over the last 9 years the Ribble Valley Housing Land Availability Schedule (July 2012) identifies that the RSS housing target has only been achieved once (in 2003/4). This is a comparable record of deliver with Wigan MBC (who achieved their targets just twice in 9 years). The Inspector on the Wigan Core Strategy concluded that, in this case, a 20% buffer should be provided. The same buffer should therefore clearly be allowed for Ribble Valley.
- 6.6 From NJL's analysis, it is apparent that the housing target has been understated. This is primarily as a consequence of the accrued shortfall in delivery being spread across the remainder of the plan period, rather than being recovered over the next 5 years. This latter approach has been considered to be correct at a number of recent appeals.
- 6.7 The actual housing target for the Ribble Valley over the next 5 years should therefore be 1,000 (200dpa for 5 years) plus 461 (the accrued shortfall since 2008) plus 292 (the 20% buffer, brought forward from later in the plan period). The total housing target is therefore 1,753 dwellings.
- 6.8 Compared to this target, the stated housing land supply of 1,414 dwellings equates to 4.03 years, materially below the 5 year housing land supply required by the Framework.
- 6.9 NJL have also analysed Ribble Valley's stated housing supply. This assessment identified a number of dwellings which appear unlikely to deliver at all (due to the time that has elapsed since construction started), are apparently not deliverable (given the time that has elapsed since the grant of planning permission or resolution to grant) or are not viable. As a consequence of this assessment, the housing supply can more correctly be stated to be 1,209 dwellings.
- 6.10 Compared to NJL's assessment of the correct housing target, the adjusted housing land supply equates to 3.45 years (or 3.6 years if the 20% buffer is not applied to the shortfall), again materially below the 5 year housing land supply required by the Framework.
- 6.11 The housing supply position is therefore significantly behind the requirements of the Framework, in which case it is clear that '*relevant policies for the supply of housing land should not be considered up-to-date.*' In cases where the development plan is out of date, the Framework states that planning permission should be granted unless

‘any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.’

Standen Strategic Site

- 6.12 An Outline Planning Application has recently been submitted for the Standen Strategic Site. This site has been identified in the emerging Core Strategy as capable of delivering some 1,040 homes towards the required target for Clitheroe specifically and the Ribble Valley in general.
- 6.13 Notwithstanding that an application has been submitted, this proposed allocation has not yet been tested at Examination. The scale of the Standen site is such that an application in advance of the adoption of the Core Strategy is clearly premature.
- 6.14 Furthermore, the information submitted with that application does not demonstrate that the site is capable of delivering 1,040 homes regardless of the appropriateness of allocating the site. There is also significant doubt as to whether the site can contribute materially to the housing supply over the next 5 years.
- 6.15 A detailed analysis of that application, and NJL’s objections to it, are set out in a detailed report that has already been submitted to the Council. A copy of this report can be found at Appendix 2.
- 6.16 Consequently, the Standen Strategic Site application should be given no weight in determining this application.

Sustainability

- 6.17 Having established that Ribble Valley BC cannot demonstrate a 5 year supply of housing land, the Framework is clear that applications should be approved where they accord with the policies of the Framework, considered as a whole.
- 6.18 Sections 7, 8 and 9 of this Statement consider each of the three main strands of sustainable development in turn, using the broad headings in paragraph 7 of the Framework, and explain how the development proposals meet those requirements. At the same time reference will be made to relevant local planning policies, to show how the proposals also comply with them, and to the supporting technical reports. Appendix 1 of this report includes a detailed schedule of each policy of the development plan, along with an explanation of compliance.
- 6.19 When determining whether the site represents sustainable development, it is also important to consider the findings of the Inspector in relation to the Gladman

Developments scheme opposite the subject site. Although that decision was issued in advance of the Framework being adopted, the draft Framework (which was substantially unaltered prior to adoption) was available and considered at length in the decision as a material consideration.

6.20 The Inspector observed at paragraph 28 that:

'[sustainability] includes such matters as meeting housing needs in general and affordable housing in particular; ensuring community cohesion; economic development; ensuring adequate provision of local health facilities and providing access for recreation in the countryside. Many of these aspects of the proposed development are uncontested by the Council and are consistent with the concept of sustainability.'

6.21 The only area of sustainability that was contested related to the accessibility of the site. In this regard the Inspector commented at paragraph 27 that:

'accessibility is but one element of a sustainable development; it is not synonymous with it. Thus, a proposal can be a sustainable one even if it suffers from limitations in terms of its accessibility by walking, cycling or public transport. The appeal site would be an extension to the existing settlement of Clitheroe, which is the main settlement in the Borough and in a location where growth would be expected to be directed. The Council accepts that in land use terms the site could be appropriately developed for housing purposes but the present proposal is not sufficiently accessible although it could be made sufficiently accessible. In my view, the development of site immediately adjacent to the built up area of Clitheroe would in principle be 'sustainable' because that is where the predominance of services and facilities are to be found.'

6.22 It is clear therefore that, subject to the specific development proposals, there is no reason why the development of the site cannot constitute sustainable development.

7.0 Socially Sustainable

‘Supporting strong, vibrant and healthy communities’

- 7.1 The housetypes on the proposed scheme will come forward at the detailed design stage (Reserved Matters) but it is expected that a range of tenures will be provided from 1 to 2 bedroom apartments up to 4 and 5 bedroomed detached dwellings. This ensures that the site will be occupied by residents of different ages, at different stages in their lifecycle and from different socio-economic backgrounds. The active street frontages, permeable layout, footpath links and areas of open space will maximise the opportunities for these groups to meet, interact and ultimately forge a new community.
- 7.2 To ensure quality of life and community cohesion are not undermined, opportunities for crime have been minimised through the design of the layout. Open spaces and footpaths are over-looked, with parking provided either within the curtilage of properties or in small, overlooked parking areas.
- 7.3 Although only at the Outline Application stage, it is envisaged that the main area of public space, which will include a Local Area of Play (LAP), will be located in a central, highly visible location close to the entrance to the site. It is connected to the rest of the development by a network of clear and legible pedestrian links some of which follow the road network with others being dedicated footpath links in overlooked green corridors. This careful design will encourage the active and continual use of public areas.
- 7.4 The **Landscape and Visual Impact Assessment** prepared by TPM identifies the importance of considering the beneficial impact that developing both sites along Henthorn Road would have on both landscape and visual effects. The approved development north of Henthorn Road proposes a substantial landscape framework to include a new community park that would connect the existing development and the edge of the River Ribble (Ribble Way long distance footpath) and the adjacent playing fields.
- 7.5 The approved development site seeks to create a community park, footpath networks and cycle ways and public open space that connects to wider recreational routes and facilities within the area, the proposed development would further enhance the

recreational provision that is absent from the immediate area and settlement structure as a whole.

‘Providing the supply of housing required to meet the needs of present and future generations’

- 7.6 The significant contribution that the proposed scheme makes to the supply of housing in Ribble Valley is considered in detail in a supporting report on housing supply submitted alongside this application. This report demonstrates that there is an approximate 3.5 year supply, clearly demonstrating an identified shortfall which this application would help to address.
- 7.7 As previously stated, a broad mix of housing types and styles will be provided, which is intended to reflect local demand. The Ribble Valley Strategic Housing Market Assessment (SHMA) (2008) identifies that there is a juxtaposition in terms of housing stock in relation to the borough and Clitheroe. Clitheroe has an abundance of terraced homes but a lower level of detached dwellings. The borough as a whole lacks the smaller 1 and 2 bedroom properties that first time buyers seek, but has an abundance of 5, 6, 7 and 8 bedroom houses. The application can help satisfy this need through the provision of a range of housetypes. The proposed scheme therefore meets the identified demand for a wide selection of homes while ensuring a range of properties are on offer to provide choice to future residents.
- 7.8 The SHMA identifies a borough wide shortfall of 264 affordable homes per annum. It is recognised that this is unlikely to be a realistic target (being higher than the allocated RSS housing provision in total) but it does highlight a clear need for more affordable homes. In addition, Ribble Valley has the third most expensive average house prices in the North West, behind only Trafford and South Lakeland, with the ratio of houses prices to incomes being tenfold (Home Truths 2012). In line with RVBC policy and the recent appeal for the development adjacent to the proposed site, subsequently a 30% affordable housing contribution will be made in addition to a variety of house types to ensure that a mixed community is created.
- 7.9 Ribble Valley’s January 2012 Housing Policy (Addressing Housing Need in Ribble Valley) reiterates the provision of 30% affordable units on housing developments of 10 or more dwellings (or sites of 0.5 hectares or more, irrespective of the number of dwellings).

‘Creating a high quality built environment’

- 7.10 The requirement for good design is embedded in the Framework and Ribble Valley’s adopted UDP (policy G1). The proposed scheme has been carefully designed taking into account the site’s context as well as the constraints and opportunities. Although currently in Outline form only, the indicative layout is one that reflects the character of the area while providing a unique sense of place.
- 7.11 This indicative layout has been achieved through a number of different approaches, many of which are covered elsewhere in this Statement: the road pattern is connected and legible; green spaces and links are logically located through the site; the scheme is centred around a substantial public open space and integrates with the existing homes to the east. Housetype elevations will be carefully designed to reflect the local vernacular; focal buildings will be located at important vistas; and the relationship with the wider countryside and AONB has been sensitively considered to comply with policy ENV3. All of these elements are covered in the Design and Access Statement and will form the parameters for a future Reserved Matters Application.
- 7.12 Vehicular access to the site has been carefully located so as to maximise the permeability of the development while avoiding a single entrance point off Henthorn Road. Additional pedestrian accesses are also provided to ensure walking distances are minimised. The **Transport Assessment** discusses the access particulars in detail, providing modelling and plans that demonstrate the sites potential to accommodate development at this location.
- 7.13 The Housing Policy (2012) does not contain references to development densities. The site will provide up to 140 homes and a substantial open space requirement. The Outline Application seeks consent for the principle of development and as such actual densities will be provided at a Reserved Matters stage.
- 7.14 A full explanation of the rationale and approach behind the design of the proposed scheme is set out in the **Design and Access Statement** which accompanies this application.

‘Accessible local services that reflect the community’s needs and support its health, social and cultural well-being’

- 7.15 Croft Transport Solutions have prepared a **Transport Assessment** in support of this application which considers the traffic and transport impacts of the development.

- 7.16 The location of the proposed development is close to a number of amenities, the accessibility of the site has been considered by the following modes of transport:
- Accessibility on foot.
 - Accessibility by cycle.
 - Accessibility by bus.
 - Accessibility by rail.
- 7.17 The report identifies that the vicinity of the site on Henthorn Road, offers excellent connectivity into Clitheroe Town Centre. The Institution of Highways and Transportation (IHT) document, entitled 'Guidelines for Providing for Journeys on Foot', highlights a distance of 800 metres as the preferred maximum distance for town centres, whilst a distance of 2 kilometres is defined as a preferred maximum for commuting. The assessment shows the 800 metre catchment encompasses the majority of the southern residential areas in Clitheroe and also includes the local services located within, such as Clitheroe Edisford Primary School and Henthorn Park. The 2 kilometre catchment extends to include the majority of Clitheroe including the town centre and its associated retail, employment and education facilities.
- 7.18 An alternative mode of travel to the site could be achieved by bicycle. Regional Cycle Route 91 is identified approximately 2.2 kilometres north-east of the site, this route is known as the 'Lancashire cycle way' and is ideal for recreational cycling providing numerous links to destinations across Lancashire.
- 7.19 The nearest bus stops to the site are located on Garnett Road approximately 400 metres north east to the site. In addition a hail and ride service is available from Kenilworth Drive/Kemple View approximately 300 metres from the site.
- 7.20 Safe pedestrian access to these bus stops is provided for via the existing pedestrian footways located on Henthorn Road and Kemple View. The proposed improvements to the pedestrian infrastructure as part of the development of the site, and the adjacent approved scheme, will enhance pedestrian access to these bus stops. A summary of the services available from the bus stops within the vicinity of the site are included within the transport assessment.
- 7.21 The nearest rail station to the site is Clitheroe and is located within the 2 kilometre pedestrian catchment. Pedestrian access to the rail station is provided via the B6243 Junction Lane then Castle View. Clitheroe rail station provides an hourly service to destinations including Blackburn, Bolton and Manchester.

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- 7.22 In summary, the site is identified as being accessible by foot, cycle, bus and rail. To further improve accessibility a Travel Plan will be submitted to the Local Authority, and the planned infrastructure improvements identified within the assessment will all help contribute to the sites accessibility to local services.

8.0 Economically Sustainable

‘Contributing to building a strong, responsive and competitive economy’

- 8.1 The Framework recognises that housing has a key role to play in ensuring vibrant, growing economies. The proposed scheme seeks to bring forward an Outline application for up to 140 residential units. This will present a development programme of approximately four years.
- 8.2 To support the local economy, the development programme will support around 70 full time equivalent jobs every year across the four-year construction period.
- 8.3 Once complete, the development is likely to be home to approximately 300 residents in a range of employment roles.
- 8.4 The, future residents of the development could be expected to spend some £3,640,000 per year in the Ribble Valley area, based on data from the Family Expenditure Survey (2009)(£500 per house per week). This could directly support around 27 new jobs in the surrounding area (estimated from previous socio-economic studies). Taking into account multiplier effects, the total number of new jobs supported by that future expenditure could be much more, and in addition the local expenditure would support local amenities and ensure that community facilities were used and supported.
- 8.5 The jobs this expenditure would support, in conjunction with new homes for local but also people from outside the area, will help Ribble Valley achieve its economic objectives as it copes with the continued effects of de-industrialisation and support the economic vitality of the borough.

‘Ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation’

- 8.6 Ribble Valley has a demonstrable need for both market and affordable housing. The borough as a whole has persistently under delivered their housing requirement. The proposed site can help deliver additional family homes while providing affordable dwellings at a sustainable location in the boroughs key market town. The NJL Consulting Housing Land Supply Analysis Report (provided in addition to this document) demonstrates that allowing residential development at this site would help

address the persistent shortfall of housing land providing a deliverable contribution to the 5 year housing supply.

- 8.7 Although the Standen Strategic site is beginning to come forward, its ability to deliver the quantum of homes proposed remains unproven. In any event, the site will take some time to deliver and is unlikely to contribute to the 5 year housing supply.

‘Identifying and coordinating development requirements, including the provision of infrastructure’

- 8.8 The **Transport Assessment** submitted with the application considered the impact of the development on the existing highways network. Extensive traffic modelling has been undertaken as part of the Transport Assessment and this has shown that the road network can accommodate the proposed quantum of development.

- 8.9 As part of the traffic impact analysis, the following conclusions were acknowledged:

- The Site Access/Henthorn Road priority controlled junction, has been designed to accord with highway design standards and will have more than sufficient capacity to accommodate the proposed development traffic.
- Henthorn Road/Bawdlands priority controlled junction is forecast to operate within capacity in all of the traffic flow scenarios.
- Henthorn Road/Eshton Terrace/Thorn Street priority controlled junction is forecast to operate in excess of its theoretical capacity in the PM peak 2016 Base scenarios, but the proposed development will have of less than 2% impact on the junction.
- Station Road/Parson Lane mini-roundabout is forecast to operate within capacity in all of the traffic flow scenarios.
- Castle View/Parson Lane priority controlled junction is forecast to operate within capacity in all of the traffic flow scenarios.
- Greenacre Street/Woone Lane/Eshton Terrace priority controlled junction is forecast to operate within capacity in all of the traffic flow scenarios.
- Whalley Road/Greenacre Street priority controlled junction is forecast to operate within capacity in all of the traffic flow scenarios.

- Primrose Road/Whalley Road priority controlled junction is forecast to operate in excess of its capacity in the 2021 Base and 'With Development' scenarios but the addition of the development traffic will have a minimal impact on its operation.
- 8.10 In summary, the Transport Assessment has demonstrated that the development proposals will result in a minimal impact on the local highway network following the implementation of the mitigation measures and highway improvements outlined within the report, and the improvements that the adjacent consented scheme are committed to delivering.
- 8.11 Other infrastructure requirements will be dealt with by appropriate **Section 106 Contributions** that were discussed earlier in this document.

9.0 Environmentally Sustainable

‘Contributing to protecting and enhancing our natural, built and historic environment’

- 9.1 The proposed development will deliver the target 10% energy demand reduction compared to a prevailing Building Regulations, Part L compliant build in accordance with RVBC’s aspirations for the site.
- 9.2 The reduction in site-wide energy demand shall be delivered primarily through a ‘building fabric-led’ approach, with an additional number of appropriate dwellings fitted with either PV or solar thermal water heating systems to further reduce energy demand.
- 9.3 An estimation of site-wide energy demand and further details of building fabric improvements and renewable energy provision will be submitted as part of subsequent reserved matters applications.
- 9.4 No heritage issues are raised by the proposed development and no further work is required at the pre-determination stage. This was confirmed by the Planning Officer for Archaeology from Lancashire County Council and is reference in the **Archaeological Report** by Wardell-Armstrong (which has been submitted as part of the planning application process).
- 9.5 The **Landscape and Visual Impact Assessment** identifies that mid and long distant views from elevated aspects (Pendle Hill, Clitheroe Castle and Longridge Fell) offer views to a wide area, resulting in the proposed site forming only a small part of that view. The change to the wider area would neither be perceivable, nor alter the character and quality of the existing views, nor appear inappropriate in the context of the suburban fringe.

‘Helping to improve biodiversity, use natural resources prudently, minimise waste and pollution’

- 9.6 An initial **Ecological Assessment** has been carried out on behalf of SLG which demonstrates that the site is of limited ecological value. No known presence of Great Crested Newts have been found on site, ponds off the site are a greater distance than 250 metres. The report concluded that Badgers are not present on the site, and no setts were recorded. It is possible that parts of the site might be used by nesting

birds, removal of vegetation should only be carried out outside the nesting season (March to August inclusive). This approach is in accordance with policy ENV7 of the adopted UDP.

- 9.7 The proposed landscape scheme which will be submitted as part of the Reserved Matters application will be carefully designed to incorporate a wide range of native species which will help enhance the biodiversity of the site as well as offering a robust buffer to the existing residential areas.
- 9.8 The **Agricultural Land Classification** report demonstrates the site is predominately Grade 4 and is subsequently not '*best and most versatile*'. Developing on land that is not best and most versatile is in accordance with policy ENV6 and the Framework.
- 9.9 The easy accessibility of a wide range of services from the site in conjunction with the excellent links by non-car transport modes helps ensure that pollution will be minimised. A proposed **Travel Plan**, submitted along with the application, will help encourage residents to use these forms of transport as an alternative to the car.
- 9.10 A desk top **Site Investigation** has been carried out by RSK, and has been submitted in support of the application. The investigation concluded that no direct evidence of the presence of contaminated soils on site has been identified, but there is a possibility that small areas of contaminated made ground may be present and there is some potential for contaminants to be present in shallow soils. It concludes that '*The risks both to human health and controlled waters from these potential sources have, in the absence of laboratory tests results, been assessed as moderate to low, but this should be confirmed.*' A full geotechnical appraisal will be undertaken prior to the commencement of development and this can be dealt with via a suitably worded condition.

'Mitigate and adapt to climate change, including moving to a low carbon economy'

- 9.11 The high environmental performance of the proposed homes along with the sustainability of the site's location have been covered in previous sections of this report, but both contribute to mitigate the effects of, and adapting to, climate change.
- 9.12 A **Flood Risk Assessment** has been completed to support this application. The site is located in Flood Zone 1 and is therefore not at risk of fluvial flooding, which complies with adopted UDP policy G7.

-
- 9.13 The FRA also includes a **Drainage Strategy** which identifies the maximum rate of surface water discharge that the development can produce without increasing the risk of flooding elsewhere; this calculation will also takes into account an allowance for the future effects of climate change. A Sustainable Urban Drainage System (SuDs) based system will be utilised on the site.
- 9.14 The final sustainable drainage strategy for this site will be designed in line with the SuDS management train. This requires that;
1. Source control techniques such as permeable paving, green roofs and rainwater harvesting are incorporated into the development design wherever reasonably possible.
 2. Where appropriate infiltration drainage is encouraged
 3. In situations where infiltration is not possible to discharge all surface water to the ground, storm water will be controlled and discharged as locally as possible with excess storm water stored on the site in surface water features.
 4. Off-site solutions and hard engineering to achieve the design criteria will only be considered where it can be demonstrated that more sustainable options above are not possible.

10.0 Conclusion

- 10.1 This Planning Statement has been prepared by NJL Consulting LLP (NJL) on behalf of the Strategic Land Group (SLG).
- 10.2 This statement has demonstrated, with support from the 5 year land supply analysis report, that there is a significant need for housing and a shortfall of housing delivery in the Ribble Valley area. In accordance with NPPF, Local Authorities are required to investigate how best this shortfall can be planned for. In this regard the identification for broad locations for future housing growth outside settlement boundaries is acknowledged.
- 10.3 The proposed site is therefore identified as the preferred and logical location for development within Clitheroe. Housing in this location will deliver tangible benefits to the town centre and local communities with no major environmental or over-riding constraints to development as demonstrated by the suite of technical documents submitted in support of this application.
- 10.4 When assessing whether a site is considered deliverable, Local Authorities should consider whether it is deliverable, achievable and developable. This report has demonstrated how this application satisfies this criteria.
- 10.5 To be deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.
- The application site is under the control of SLG who are committed to delivering a residential scheme on this site.
 - The site is located near a range of community facilities and with good access to jobs, key services and infrastructure with no over-riding constraints to development.
 - The commitment and track record of SLG to deliver sites is evidence that this site will be delivered.
- 10.6 NPPF requires local planning authorities to boost significantly the supply of housing. In addition to this, the NPPF necessitates that applications should be approved

where plans are out-of-date and that local planning authorities should consider favourably applications for housing where they are unable to demonstrate an up-to-date five year supply of deliverable sites.

- 10.7 In light of the pressing housing targets and significant benefits this application affords the local community, we urge the Council to consider this application favourably and facilitate the delivery of an important site for housing in the short and long term.

APPENDIX 1: COMPLIANCE WITH LOCAL PLAN POLICIES

Ribble Valley District Wide Local Plan, Adopted June 1998

POLICY	AIM	COMPLIANCE
G1 Development Control	All development proposals are expected to provide a high standard of building design and landscape quality without affecting the amenities of the surrounding area.	The development proposal is for a high quality design, as described in this report and the supporting Design and Access Statement.
G5 Outside Settlement Boundaries	To direct developments mainly towards land within the main settlement boundaries.	The proposed scheme contributes to a local housing need (affordable housing).
G11 Crime Prevention	To deliver safe and well designed developments.	Secure by Design principles will be considered throughout the design stage.
ENV1/ENV2/ENV3 AONB	To deliver protection, enhancement and to conserve areas within and adjacent to the AONB.	The development proposal is for a high quality design, as described in this report and the supporting Design and Access Statement, taking into account the surrounding landscape.
ENV6 Agricultural Land	To protect the best and most versatile agricultural land.	The proposed site is classified as grade 4 with a small area of 3b.
ENV7 Protected Species	To ensure that development proposals would not have an adverse impact on badgers or species protected by the Wildlife and Countryside Act.	The ecology survey submitted with the application shows how the proposal will not have a detrimental impact on flora or fauna of value or protected on or near the development site. The landscaping scheme uses native species where possible and will therefore increase the biodiversity value of the site.
T1 Highway Improvement and Traffic Management	To ensure that any proposed new roads are consistent with the overall transport strategy.	The Transport Assessment has shown that the proposal will not negatively impact on the highway infrastructure.
T7 Parking	To ensure new developments provide adequate car parking and servicing space.	Parking provision on the proposed layout provides sufficient parking across the site.

POLICY	AIM	COMPLIANCE
T12 Cycling	To ensure that development proposals consider provision for cyclists.	The proposal includes a network of footpath and cycle routes which link in to existing cycle networks in the area.
T15 Walking	To ensure that the needs of pedestrians are taken into account within development proposals, with travel by foot and via public transport being encouraged.	The proposed scheme includes a network of footpaths, while a number of services are available within walking distance of the site.
ENV7 Protected Species	To ensure that development proposals would not have an adverse impact on badgers or species protected by the Wildlife and Countryside Act.	The ecology survey submitted with the application shows how the proposal will not have a detrimental impact on flora or fauna of value or protected on or near the development site. The landscaping scheme uses native species where possible and will therefore increase the biodiversity value of the site.
ENV14 Archaeological & Historic Heritage	To ensure protection of Archaeological remains.	The Archaeological survey submitted with the application shows no adverse impacts on Heritage or Archaeological remains.

Ribble Valley Core Strategy Reg. 22 Composite Submitted Version (Submission for EiP Version)

POLICY	AIM	COMPLIANCE
Key Statement DS2: Presumption in Favour of Sustainable Development	To deliver a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.	The supporting information has demonstrated that the proposed site is sustainably located. In addition Ribble Valley has a shortfall in their housing supply and the site will help contribute to this.
Key Statement EN2: Landscape	To deliver development that is in keeping with the character of the landscape, reflecting local distinctiveness, vernacular style, scale, style, features and building materials.	The development proposal is for a high quality design, as described in this report and the supporting Design and Access Statement, taking into account the surrounding landscape.

POLICY	AIM	COMPLIANCE
Key Statement EN3: Sustainable Development and Climate Change	To deliver development that meets an appropriate recognised sustainable design and construction standard where viable to do so, in order to address both the causes and consequences of climate change.	Demonstrated through a 10% reduction in CO ₂ emissions and through the use of sustainable drainage design (SuDS).
Key Statement EN4: Biodiversity and Geodiversity	To deliver and conserve wherever possible the area's biodiversity and geodiversity and to avoid the fragmentation and isolation of natural habitats and help develop green corridors.	The ecology survey submitted with the application shows how the proposal will not have a detrimental impact on flora or fauna of value or protected on or near the development site. The landscaping scheme uses native species where possible and will therefore increase the biodiversity value of the site.
Key Statement EN5: Heritage Assets	To conserve and enhance the Heritage Assets and their settings	The Archaeological survey submitted with the application shows no adverse impacts on Heritage or Archaeological remains.
Key Statement H1: Housing Provision	To deliver 4,000 dwellings, estimated at an average annual completion rate of at least 200 dwellings per year over the period 2008 to 2028	This proposal contributes up to 140 deliverable homes towards the required supply of housing.
Key Statement H2: Housing Balance	Planning permission will only be granted for residential development providing it can be demonstrated that it delivers a suitable mix of housing that accords with the projected future household requirements and local need	An appropriate mix of house types will be included within the proposed development to ensure that a mixed community is created.
Key Statement H3: Affordable Housing	To deliver the appropriate supply of affordable housing.	The proposed scheme will deliver 30% affordable housing, resulting in approximately 42 affordable homes, in line with LPA requirements.
Key Statement DMI1: Planning Obligations	To deliver development that contributes to the needs of local communities and sustainable development	The proposed scheme will contribute to the addition of local facilities in the form of an affordable housing contribution, New Homes Bonus and a submitted Draft S106 agreement.

POLICY	AIM	COMPLIANCE
Key Statement DMI2: Transport Considerations	To reduce the need to travel by car and improve cycle and pedestrian links.	The proposal includes a network of footpath and cycle routes which link in to existing cycle and footpath networks in the area. Key facilities are within walking distance and there is a good public transport provision within the vicinity of the site.
Policy DMG1: General Considerations	To encourage developments of high quality design which meet the needs of occupiers, include suitable parking and access arrangements, propose suitable landscaping and fencing, cause no unacceptable impact on neighbouring properties, and minimise opportunities for crime and anti-social behaviour.	The development proposal is for a high quality design, as described in this report and the supporting Design and Access Statement
Policy DMG2: Strategic Considerations:	Development should be in accordance with the core strategy development strategy. Outside the settlement areas development must meet one of the listed criteria.	The proposed development is for local needs housing which meets an identified need – providing an affordable housing contribution and help contribute to the housing requirement. This need has been demonstrated through the approval of the adjacent site through an appeal process.
Policy DMG3: Transport and Mobility	To deliver public transport and associated infrastructure to serve those moving to and from the development.	The Transport Assessment has shown that the proposal will not negatively impact on the highway infrastructure. The proposal is accompanied by a travel plan demonstrating how the development will contribute to sustainable transport objectives and how residents will be encouraged to use non-car modes of transport.
Policy DME1: Protecting trees and woodlands	To protect the Boroughs Trees and Woodland Provision.	The Arboricultural survey demonstrates that no quality trees will be removed as part of the development. The landscaping scheme includes planting new trees.
Policy DME2: Landscape and Townscape Protection	To protect the boroughs Landscapes and Townscapes.	The proposal will contribute to the townscape by good design and careful consideration of neighbouring uses, as demonstrated in the supporting Design and Access Statement.

POLICY	AIM	COMPLIANCE
Policy DME3: Site and Species Protection and Conservation	To ensure that development proposals would not have an adverse impact on badgers or species protected by the Wildlife and Countryside Act.	The ecology survey submitted with the application shows how the proposal will not have a detrimental impact on flora or fauna of value or protected on or near the development site. The landscaping scheme uses native species where possible and will therefore increase the biodiversity value of the site.
Policy DME6: Water Management	To deliver appropriate measures for the conservation, protection and management of water. To ensure there are no risk of flooding due to new development.	The drainage strategy submitted in support of the application demonstrates the proposal has adequate water supply resources and foul sewer capacity to serve the development. The site is located in Flood Zone 1 and is therefore not liable to flooding. The proposed drainage strategy will ensure that suitable surface water attenuation measures are incorporated.
Policy DMH1: Affordable Housing Criteria	To deliver the provision of affordable housing units.	The proposed scheme to contribute 30% affordable housing provision.

APPENDIX 2: STANDEN OBJECTION

Strategic Land Group

**Objection to Standen
Estates Outline
Planning Application**

November 2012

Ref:2012-156-010a

Strategic Land Group

Objection to Standen Estates Outline Planning Application

November 2012

Ref:2012-156-010a

Authorised for and on behalf NJL Consulting LLP



**Nick Lee
Partner**

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

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1.0 Introduction

1.1 This NJL Consulting LLP (NJL) have been instructed by Strategic Land Group (SLG) to **formally object** to the Standen Estates Outline Planning Application (3/2012/0942) for 1040 residential dwellings.

1.2 The objection will contain the following sections:

- Preferred Options Consultation
- Prematurity
- Density and Delivery
- Transport
- Landscape and Visual Impacts
- Summary

1.3 This report has appraised only the key concerns identified in the application, and will therefore not discuss in detail individual documents submitted as part of the application.

The proposed development

1.4 The scheme is located on the Standen Estate, Clitheroe and comprises of the following:

- 728 market homes;
- 312 affordable homes;
- 0.5ha for local retail, service and community facilities;
- 2.25ha of employment (Class B1) accommodating up to a maximum gross floorspace of 5575m²;
- 2.1ha of land for a primary school
- Public open space including green corridors and areas for tree planting and landscaping
- An improved (roundabout) junction between Pendle Road and the A49;

-
- New vehicular, pedestrian and cycle accesses onto Pendle Road and littlemoor;
 - New pedestrian and cycle accesses onto Worston Old Road
 - Temporary vehicular access onto Worston Old Road
 - New pedestrian and cycle access from the end of Shays Drive; and
 - Roads, sewers, footpaths, cycleways, services and infrastructure including:
 - A Sustainable Urban Drainage System;
 - New services such as gas, electricity, water and telecommunications

2.0 Preferred Options Consultation

- 2.1 In March 2011 Ribble Valley consulted on their issues and options (Regulation 25) Core Strategy. The consultation provided the following options:

Development Strategy Option 1: Development will be directed towards the service centres comprising Clitheroe, Longridge and Whalley, including the opportunity to expand their existing settlement limits to accommodate residential and employment growth. Limited development will be accommodated through appropriate village growth and/or expansion where appropriate.

Development Strategy Option 2: Longridge will be viewed as a strategic growth area for the Ribble Valley and a focus of development striving to achieve a competitive and sustainable economy, providing opportunities not only for economic development but also for social and environmental improvement.

Development Strategy Option 3: Development in the borough will be accommodated through the strategic release of sites that can accommodate high levels of development. A number of strategic sites will be released to create opportunities for new local communities and areas of growth whilst supporting the protection of the wider environment for future generations.

Development Strategy Option 4: Options to put forward by respondents.

- 2.2 The results of this consultation found that option 4 was most frequently highlighted as the 'preferred' strategy option. (750 bodies/people commented – 3920 representations were made, 1 issue per representation)
- 2.3 5% of comments came from people in Clitheroe.
- 2.4 A total of 213 representations were received which supported option 4 as an alternative to option 1, 2 and 3. Of these 213 representations, 197 representations were made which gave the actual detail of what the respondent would like to see included in this option 4 such as suggestions for particular settlements. Most representations (90 reps) suggested an option to spread all the proposed housing development throughout the Borough's towns and villages rather than concentrating it mainly within the three settlements as described in options 1 and 2 of the Regulation 25 Core Strategy consultation document.

- 2.5 Only 11 representations suggested that an option 4 approach could involve focusing all or the majority of future development on Clitheroe and Longridge.
- 2.6 The Council then provided additional options due to the majority of representations supporting option 4. In this consultation, the additional representations provided the option of the Standen Estate strategic site release.
- 2.7 The second consultation received formal representations from 1150 bodies/individuals, containing a total of 2807 representations. When compared to the previous consultation it is evident that although around 400 more individual letters/response forms were submitted at this alternative options stage, this generated 1113 fewer separate representations or 'issues'.
- 2.8 The majority (28%) of representations were made from people living in Clitheroe (the previous response from people living in Clitheroe was just 5%). The second highest number of representations (21.8% of all reps received) was received from people living in the parish of Barrow and Wiswell closely followed by people living in Whalley (21.7% of all reps received).
- 2.9 This second consultation provided some support for a strategic delivery site, but as identified, the majority of representations were now made by people living in Clitheroe.
- 2.10 What seems to be confusing through the consultation process and from the responses received is where the Strategic Site that would deliver over 1,000 dwellings came from? It is clear from the consultation responses that this was not a preferred option from a local view point. It is apparent that the people from Clitheroe did not want a strategic site. Ribbles Valley Borough Council seemed to adopt an approach that is at odds with the consultation results.
- 2.11 National Policy and as identified in the Regulation 25 document (Core Strategy consultation) that for a Core Strategy to be 'sound', it should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

JUSTIFIED means that the document must be:

- Founded on a robust and credible evidence base
- The most appropriate strategy when considered against the reasonable alternatives

EFFECTIVE means that the document must be

- Deliverable
- Flexible
- Able to be monitored.

NATIONAL POLICY means the National Planning Policy Framework (NPPF) which has a 'presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking'.

Summary

- 2.12 It is not clear if the views and opinions of Ribble Valley residents were properly accounted for in the production of the preferred options. It is clear from the consultation responses that the Standen Estates strategic site was not a preferred option from a local view point.

3.0 Prematurity

3.1 Ribble Valley Borough Council are now currently at their final stages of producing their Development Plan Document for the Borough to cover the periods between 2008-2028. The document is currently at the Regulation 22 stage – submission to the Secretary of State (SoS).

3.2 The Core Strategy should set out the vision, objectives, spatial strategy and core policies that will guide and shape development. The Core Strategy Reg 22 Composite Submitted Version (28th September 2012) states the primary purpose of the document is to:

‘set a more strategic level of planning policy for the area. Whilst the Core Strategy will identify broad locations and appropriate “strategic areas of development” detailed information on allocations of land for development and other detailed policies and standards to judge specific developments will be set out in other documents within the LDF.’

3.3 The subsequent submission of a planning application that identifies and brings forward a strategic housing site that has the capacity to deliver over 25% of the entire housing requirement over the 20 year plan period (2008-2028) prior to the formal adoption of the Core Strategy raises key prematurity issues.

3.4 Guidance from DCLG (Planning System: General Principles) states that it may be *‘justifiable to refuse planning permission on grounds of prematurity where a DPD is being prepared or is under review, but it has not yet been adopted. This may be appropriate where a proposed development is so substantial, or where the cumulative effect would be so significant, that granting permission could prejudice the DPD by predetermining decisions about the scale, location or phasing of new development which are being addressed in the policy in the DPD’*. A proposal for development which has an impact on only a small area would rarely come into this category.

3.5 The Standen Estate is clearly ‘so substantial’ that if permission was to be granted prior to the Examination in Public (EiP) then the Core Strategy would be prejudiced due to the absence of an independent analysis by an inspector. This independent examination would look at the Council’s strategy as a whole and determine if it is

‘sound’ and whether the ‘preferred’ option taken by the Council is in fact deliverable and in line with National guidance.

- 3.6 There is currently uncertainty over the form of layout and likely yield of new homes from the development. The Core Strategy states that the final boundary of the site has yet to be determined *‘having regard to the need for structural planting, the approach to density and land uses within the site and the mechanisms for achieving delivery.’* This statement belies that lack of certainty that the Council themselves have as to what can be delivered from the site, and acknowledges that the residential yield is a material risk to the plan.
- 3.7 It is for these reasons that it is apparent that making any formal decision before the EiP on a site of this scale would be considered premature and the Council would be open to challenge.
- 3.8 In addition, the Sustainability Appraisal identifies that there is ‘some uncertainty’ over whether the level of growth proposed at Standen could put ‘too much pressure’ on local services and infrastructure. For a site of such significant importance to the delivery of the Core Strategy, it is imperative that this uncertainty is removed before the allocation is confirmed or the application is considered.
- 3.9 A recently dismissed (March, 2012) appeal decision for 1200 dwellings at Hatchfield Farm, Newmarket (2142030) highlights this point:

‘the Secretary of State agreed with the Inspector’s reasoning and conclusions with regard to the matter of prematurity. He considers that the completion of between 100 and 200 dwellings in the five year period would help to rectify the existing shortfall of 483 dwellings against the target but agrees that, set against these short term benefits, the Single Issue Review would properly compare the long term sustainable alternative locations for housing developments in a way that simply cannot be carried out in determining a planning appeal. He further agrees that it would also give local residents an opportunity to influence the planning of their own communities. Even though the Single Issue Review has a long way to go before adoption, to allow such a large development, of which the housing element alone would amount to some 16% of the residual requirement for the whole District, would pre-empt the proper operation of the Development Plan process, as referred to at paragraph 17 of The Planning System: General Principles.’

- 3.10 Applications can also be refused if schemes are in conflict with existing policies and would have an impact on the forthcoming DPD. An example of this is the Mowbreck Lane, Wesham [2127459] (264 units) appeal where the inspector concluded that the ground of prematurity is not justified but is a key element in that it would influence the conception of the plan.

‘Although I have concluded at paragraph 11.48 above that a refusal on the ground of prematurity is not justified, the appeal proposal is in substantial conflict with saved policies of the FBLP. The appeal proposal is a significant one in the context of Wesham. A favourable determination of the appeal now would be made in advance of a revised estimation of the appropriate level of future housing provision required for the whole of the Council’s area; it would pre-empt decisions on revised settlement boundaries; and it would predetermine the issue of the release of a significant area of agricultural land.

I am not convinced that there is a need for a decision to be taken now to allow the development of the appeal site. On balance, I conclude that the non-compliance of the appeal scheme with the Development Plan outweighs the material considerations in favour of the development.’

- 3.11 In conclusion, the Inspector recommended that the application be dismissed until the scheme could be assessed against the forthcoming Local Plan policies and the correct boundaries were established over the proper plan process. It is acknowledged that this appeal pre-dates the NPPF, but its primary purpose as an example is to demonstrate the recommendation to ‘hold off’ on a decision prior to the Plan being adopted.
- 3.12 These examples mirror the situation that Ribble Valley Borough Council currently find themselves in and it would be premature to decide the Standen Estate application until the Core Strategy has had the opportunity to be appropriately assessed in an Examination in Public.

Summary

- 3.13 The Standen Estate is clearly substantial. If planning consent was to be granted prior to the Examination in Public (EiP) then this would clearly predetermine the scale, location and phasing of new development. It is therefore wholly appropriate to refuse the application on prematurity grounds, in accordance with DCLG Guidance.

4.0 Density and Delivery

- 4.1 No evidence has been presented to show that the site can deliver the number of homes proposed.
- 4.2 The approximate size of the site as identified in the Design & Access Statement (TaylorYoung) is 50.1ha. Even if the whole site area could be developed in its entirety with new homes, this would result in a density of approximately 21 dwellings per hectare (dph).
- 4.3 However, the Core Strategy itself recognises that the net area is likely to be significantly lower than the gross area. Not only is there a requirement for land-uses other than residential development (such as a school, employment provision and open space), but the Core Strategy also acknowledges that:

The extensive area proposed has been identified to enable adequate scope to achieve the highest quality design, appropriate layouts that can help protect important views across the site and strategic planting that will assist in reducing the impact of the strategic site.

- 4.4 To determine whether the density is deliverable or not, it is necessary to identify the impact on the area of the site of accommodating these other land uses – employment provision, school provision, heritage mitigation, ecological requirements, SUDS and areas of open space.
- 4.5 As part of the application, TaylorYoung produced an illustrative masterplan identifying how these various issues can all be accommodated within the scheme. In addition to the areas of residential development, the following uses have been incorporated:
- Proposed school site (amounting to 2.1ha).
 - Proposed employment site (amounting to 2.25ha).
 - Neighbourhood retail centre, fronting Pendle Road (amounting to 0.5ha)
 - Stand-off from the route of the Roman Road.
 - Buffer to Pendleton Brook and the smaller brook crossing the site.
 - The provision of a new watercourse through the site as part of the proposed drainage system.

- Three identified play areas at various locations with the site.
- 4.6 The masterplan does not identify the total area of the site that is to be set aside for residential development. The net area of the residential development has therefore been estimated by measuring the approximate areas of the developable parcels as identified on the masterplan as 28ha. Already, this is a 40% reduction in the area of the site.
- 4.7 Furthermore, at this stage the masterplan would still seem to over-estimate the net developable area of the site. For example, it does not incorporate the western-most line of the trees to the south of the site adjacent to Lingfield Avenue.
- 4.8 Nor would the provision of open space appear to be adequate; although green corridors run through the majority of the site and three specific play areas are identified within them, the only substantial areas of open space are located to the south of the site in what is identified as being the final phase of development. On Steven Abbott Associates (Abbott's) own assessment this will be at least 10 years away from being delivered. Further open space provision would therefore need to be provided to the north of the site, in an earlier phase of delivery, to meet the needs of the residents of the scheme over the first 5 to 10 years of the development. The proposed open space has presumably been located in that position to allow it to take advantage of the ecological constraints in that part of the site (such as the area of wetland), it would therefore seem likely that that this proposed open space could not be developed to off-set the provision of further open space to the north of the development, further reducing developable area of the site.
- 4.9 The balance of land-uses is also yet to be determined. Although this masterplan assumes that 2.25ha of employment space will be adequate, there is no guarantee that this will remain the case as RVBC move forward with their intended Development Plan Documents and Supplementary Planning Document which are intended to provide further details in this regard.
- 4.10 When attempting to deliver a site of this size, it is imperative that the existing service infrastructure is adequate to accommodate the proposed development. The Core Strategy is largely silent on the issue of infrastructure, although it is observed that significant improvements are required to the existing sewer network:

'On the basis of currently known development in the area and regulatory requirements, United Utilities has stated that the development of this

strategic site would necessitate the need for improvements in water and wastewater infrastructure and has therefore identified a need for appropriate phasing to allow for the practical implications associated with infrastructure enhancement.'

4.11 Furthermore, the wording is proposed to be incorporated into the Core Strategy as part of a series of proposed modifications which were released for consultation in October. The fact that these obstacles to development were identified at such a late stage in the Core Strategy process emphasis that there has been inadequate research into the ability of the Standen Site to fulfil its intended role.

4.12 In order to facilitate development, a significant volume of surface water storage is required. The stated intention is to store this water in hard pipes and underground storage tanks, although the preference from utilities providers is that attenuation is provided via either soakaways or above ground storage ponds. Below ground, hard storage should be considered a last resort and, on a site of this size, there would appear to be no technical reason why the storage could not provided via a network of attenuation ponds. Of course, this solution would impact upon the developable area of the site.

4.13 The Local Housing Delivery Group (LHDG) publication 'Viability Testing Local Plans' provides guidance on the likely ratio of gross to net developable areas, stating that:

The net area can account for less than 50% and sometimes as little as 30% on larger sites, of the site to acquired (i.e. the size of the site with planning permission). Failure to take account of this difference can result in flawed assumptions.

4.14 Taking the best case scenario as set out by the LHDG of 50 % ratio, this would result in a net area for the site of 24.5ha. This is below the area implied by the illustrative masterplan, underlining the foregoing comments about its likely shortcomings. Were this (generous) assessment of the net developable area to prove correct, this would result in a residential development density of in excess of 42dph.

4.15 When determining the likely residential yield from a strategic development site, it is imperative that a local authority has regard to what density of development is viable for a site of that size in that market location. Fortunately, RVBC have a recent example of a large, Greenfield site in Clitheroe from which to draw comparison. This

development, to the west of Henthorn Road just 2km from the Standen Estate site, was granted planning permission in March 2012.

- 4.16 The west of Henthorn Road site amounted to 15.7ha, although the net area was just 8.27ha. This is approximately a 50% reduction from gross to net area, despite not including any employment or neighbourhood retail uses, which underlines both the robustness of the LHDG assessment and the over-optimism of the Abbotts illustrative masterplan.
- 4.17 The developable 8.27ha of the site was intended to accommodate 270 dwellings ranging in size from 2-5 bedrooms. Although much smaller than Standen, this is still large enough to contain the full range and mix of house types that it is considered the market can accommodate in this location. This proposal equates to 32dph – significantly below the 42dph that Standen will need to achieve if it is to deliver the 1,040 homes that RVBC intend. Assuming that the density ultimately delivered on the site is in line with the Market evidence provided by the land west of Henthorn Road, and that the net area of the site accords with the top end of the LHDG range (as also supported by the land west of the Henthorn Road), then the Standen site would deliver just 784 dwellings. This would leave a shortfall in delivery of new homes in Clitheroe of some 256 dwellings.
- 4.18 Such is the uncertainty over the form of layout and likely yield of new homes from the development, the Core Strategy states that the final boundary of the site has yet to be determined ‘having regard to the need for structural planting, the approach to density and land uses within the site and the mechanisms for achieving delivery.’ By itself, this statement belies that lack of certainty that the Council themselves have as to what can be delivered from the site, and acknowledges that the residential yield is a material risk to the plan. When the importance of the site is taken into account (it is described as being ‘central to the delivery of the Core Strategy’), it cannot possibly be the case that the Core Strategy can be considered robust.
- 4.19 The Design & Access Statement contains information on phasing but not delivery. It is important to consider the implications of the phasing in terms of realistic conditions on the development site in relation to delivery rates.
- 4.20 If we take an optimistic view and consider the site being able to deliver 1040 units. The access would limit the site to a maximum of 2 or 3 developers at a time. The average build rate per developer is 30 dwellings per annum (dpa). This equates to a

build rate of 60 to 90 dpa, resulting in a build out rate of between 12 to 17 years. From the phasing plan shown in the D&A statement, the development will begin at the front of the site and work its way through to the rear. One access is shown.

- 4.21 The 'start date' for the Core Strategy is 2008, with the plan intended to run until 2028. This means there are 15.5 years left in the plan period.
- 4.22 For a site of the scale of Standen, significant infrastructure works will be required before development commences. These include: the required improvements to the Pendle Road/A59 junction; installation of a Surface Water Drainage System (which is due to discharge to the south of the site, the furthest point from the first construction phase); construction of service and access road within the site; and enhancement to the wider service network (and in particular drainage). These works could be reasonably expected to take 18 months.
- 4.23 Before these works could commence, Outline Planning Permission needs to be secured. As the Trustees of the Standen Estate are not developers, they would presumably wish to dispose of a first phase of development to a house builder. The developer would then need to secure and Reserved Matters Consent. This stage of the process would conservatively take 18 months.
- 4.24 Consequently, it is likely to be three years before deployment of homes commences on site. At that stage, there would be 12.5 years left in the plan period. To ensure delivery of the site, three developers would therefore be required on site from day one. This seems an impossible outcome, as it would significantly diminish competition for the first parcels of the site to be sold, impairing the receipt for the owners. As Trustees, the site owners have a fiduciary responsibility to maximise the return from the site, which this strategy would manifestly not achieve.
- 4.25 We do not; therefore believe the 1,040 homes can be delivered from the site during the plan period.

Summary

- 4.26 Based on our assessment, we believe the site cannot deliver 1,040 homes during the plan period. A more realistic, robust development yield would be 785 dwellings.

5.0 Transport

- 5.1 Croft Transport Solutions were commissioned by SLG to review the Transport Assessment (TA) after a number of concerns were raised with regard to the single access point and surrounding road uses. The note is summarised here, but the full version is presented in Appendix A.

Public Transport

- 5.2 Due to the inherent size of the site, access points that have been used for calculating distances are incorrect. As such, much of the site will be a substantially greater distance from the facilities within Clitheroe than is suggested by the catchment plan. The transport interchange will, for example, fall outside the 2km catchment for parts of the site. Therefore the Transport Assessment is over-estimating the accessibility of the site for pedestrians.
- 5.3 The site cannot be considered to be well located for access by rail because the train station is well over 1km from the site. The TA refers to guidance set out in the IHT document 'Guidelines for Planning for Public Transport in Development', which confirms that new development should be located so that public transport trips involve a walking distance of less than 400m from the nearest bus stop or 800m from the nearest rail station.
- 5.4 There is a question mark as to how well located the whole site is for access by bus. The TA confirms that the nearest bus stops are located on Whalley Road, which are less than 400m from the site; however, this is measured from the site access points. As previously stated, given the scale of the development, a vast majority of the site will be a distance greater than 400m from the existing services identified, with some areas being around 1km from the nearest bus stop.
- 5.5 The TA also refers to bus services that extend along Pendle Road, Peel Park Estate and other services around Clitheroe without confirming the distances to the relevant bus stops.
- 5.6 The TA does suggest that the proposals will enhance public transport facilities and encourage services into the site, but there is no commitment that this will be delivered as part of the proposals or, indeed, that any preliminary discussions have

taken place with local bus operators that would indicate a willingness to serve the site.

- 5.7 In light of these issues, accessibility of the site for pedestrians has been considerably over-estimated and it has not been demonstrated that the site is or will be accessible by public transport, which could result in an over-reliance on the private car.
- 5.8 The TA advises that in order to encourage sustainable travel and reduce reliance on the private car, appropriate travel plan initiatives will be implemented. This will, it is advised, set a number of targets in order to reduce reliance on the private car, which would be reviewed and updated when required.
- 5.9 It is unclear how effective the possible measures identified in the Travel Plan Strategy will be in reducing reliance on the private car given, for example, the deficiencies in public transport accessibility highlighted above.

Access

- 5.10 The TA refers to proposed improvements to the A59/Pendle Road/Clitheroe Road junction that would replace the existing staggered priority arrangement with a roundabout. It is assumed that this can be delivered on land within the adopted highway or within land controlled by the applicant.
- 5.11 The main vehicular access to the development will be via a mini-roundabout along Pendle Road. Croft Transport has noted, that in their experience, Lancashire CC are reluctant to accept a mini-roundabout arrangement to serve residential development.
- 5.12 A secondary vehicular access will be provided onto Littlemoor Road, though it is stated that the use of this will be restricted to emergency access and buses (as well as pedestrians and cyclists). It has not been made clear, from the indicative layout shown in Plan 9 or the description within the text how the traffic will be restricted. Croft Transport has recommended that given the traffic impact analysis has been predicated on the basis of this restricted access, it is essential that this is secured as part of the planning process.
- 5.13 The TA states that the area identified for employment uses is some distance away from the main site access but that in order to allow this area to come forward as an early phase of development a temporary vehicular access could be constructed from

Worston Old Road, which could ultimately revert to an emergency/pedestrian/cycle access. The following issues have been identified with strategy:

- It is noted that this part of the site is in excess of 600m from Pendle Road and is not, therefore served by bus services.
- Worston Old Road does not benefit from footways and, as the boundary adjacent to Worston Old Road does not extend as far as Pendle Road, it would appear that a complete footpath link cannot be provided to Pendle Road.
- The early release of development in this area would be particularly reliant on the private car due to these issues.

Traffic Impact Assessment

- 5.14 The TA has not identified all recently approved applications within the vicinity of the site and subsequently the traffic associated with this development has not been accounted for, which will under-estimate the background levels of traffic.
- 5.15 The TA has referred to the trip distribution work carried out as part of the Royal Haskoning Transport Appraisal. This suggests that 60% of trips to work use the A59 with 'very few' passing through the town centre.
- 5.16 The development traffic has been assigned to the network on this basis, an increase in link flows determined. The TA suggests that an increase of around 460 trips to the south of the main site access and around 340 trips to the north of the main site access would occur during the weekday am peak. Similarly, an increase of around 400 trips would occur to the south of the main site access and around 280 trips to the north of the main site access would occur during the weekday pm peak.
- 5.17 However, given the analysis is likely to substantially underestimate the levels of traffic associated with the development; these figures are also likely to be underestimated.

Summary

- 5.18 The Transport Assessment analysis identifies a number of deficiencies within the traffic impact analysis (please refer to Appendix A for full details) concluding that the traffic associated with the proposed development cannot be accommodated on the local highway network.

6.0 Landscape and Visual Impacts

- 6.1 A key issue that has been identified is one of scale. There is a general ‘tipping’ point (in terms of landscape assessment) at which a site ceases to be a discreet extension to the urban fringe and becomes a separate entity. The proposed development at 1,040 dwellings is considered to be easily beyond the maximum number before it becomes an individual settlement, in its own right.
- 6.2 Schemes of 1000 plus units usual incorporate a retail area, community centre and such additional provisions and subsequently act as individual settlements.
- 6.3 Due to this, issues relating to the impact on the townscape of Clitheroe need to be considered. The site is on a gently rising slope leading from the town towards the foot of Pendle Hill, Clitheroe will no longer appear to be a town set amongst green fields but will instead will find immediately adjoin the A59. This will fundamentally change the appearance of Clitheroe from the view point. Conversely, an equivalent number of units on a number of smaller sites can be more easily accommodated within the landscape, with fewer harmful effects.
- 6.4 The potential impact on the function of the existing town should be assessed to determine if the correct strategy is in fact to approach the housing requirement in one strategic site or whether it would be more appropriate to bring forward a series of smaller developments integrated into the existing settlement.
- 6.5 Integrating new development into existing settlements is obviously a more sustainable option due to the development supporting existing facilities and infrastructure provisions such as public transport networks.

Summary

- 6.6 The scale of the site is such that it represents a settlement in its own right and an assessment on the basis that it is an ‘extension’ is therefore not appropriate. It would have an unacceptable impact on views of Clitheroe from Pendle Hill, while the impact on the function of the town has not been properly addressed.

7.0 Summary

- 7.1 This document has demonstrated that the Standen Estate strategic site has a number of issues that need resolving.
- 7.2 It is not clear if the views and opinions of Ribble Valley residents were properly accounted for in the production of the preferred options. It is clear from the consultation responses that the Standen Estates strategic site was not a preferred option from a local view point.
- 7.3 The application is premature as defined by DCLG Guidance.
- 7.4 Based on our assessment, we believe the site cannot deliver 1,040 homes during the plan period. A more realistic, robust development yield would be 785 dwellings. In any event, 1040 homes are incapable of being delivered during the remaining plan period.
- 7.5 There are a number of deficiencies found within the traffic impact analysis that shows the traffic associated with the proposed development cannot be accommodated on the local highway network.
- 7.6 Key issues of scale and townscape have been highlighted in regard to landscape and visual assessment. These issues should be addressed.
- 7.7 The impacts of the infrastructure requirements for the new development needs to be addressed properly, to determine if the Standen Estates application is in accordance with the National Frameworks (NPPF) presumption in favour of sustainable development.
- 7.8 In summary the proposed scheme is **NOT Justified**, is **NOT EFFECTIVE** in terms of being deliverable technically, and is **NOT consistent with the NPPF** in terms of it being a sustainable development due to the identified Transport and Landscape issues. In light of all these issues, we would like to register **OBJECTION** to the Standen Estates application (3/2012/0942) for 1040 residential dwellings.

Appendix A

**PROPOSED RESIDENTIAL DEVELOPMENT, HENTHORN LANE, CLITHEROE (0248)
CONSIDERATION OF STANDEN ESTATE TRANSPORT ASSESSMENT - NOVEMBER 2012**

Introduction

The following provides a consideration of the Transport Assessment prepared by SBA in support of the planning application for a proposed residential-led mixed use development at Standen Estate, Clitheroe.

The application is an outline application with all matters reserved, including access.

The Transport Assessment (TA) advises that a wider Transport Appraisal was prepared by Royal Haskoning in November 2010, the purpose of which was to demonstrate to Ribble Valley Borough Council (RVBC) and Lancashire County Council that the Standen Estate land was suitable for development. RVBC has resolved to promote the proposal as its Strategic Site in the Submission version of the Draft Core Strategy.

The TA supports a planning application for 1,040 dwellings, 0.5ha of local retail, service and community facilities, and up to 5,575sqm of Class B1 employment. The TA also accounts for the provision of a primary school, though this does not form part of the application.

Context of the Site and Existing Conditions

The TA confirms that the site currently has direct pedestrian access to the existing built area via the footways on Pendle Road, Littlemoor Road and via a footpath onto Langshaw Drive. The report then refers a plan showing 1km and 2km walk catchments, taken from the site access points.

However, the site covers a considerable area, with the southern boundary being up to 700-800m (as the crow flies) from these access points. As such, much of the site will be a substantially greater distance from the facilities within Clitheroe than is suggested by the catchment plan. The transport interchange will, for example, fall outside the 2km catchment for parts of the site.

The TA is therefore over-estimating the accessibility of the site for pedestrians.

We would also note that the section of Pendle Road in the vicinity of the site only benefits from a footway on the south-western side. Whilst this is on the side fronting the site, it is of some relevance particularly in accessing the site by bus, as it may not be possible to provide a new bus stop for southbound vehicles.

The TA considers the accessibility by cycle and refers to a 5km catchment. Whilst it is not clear whether this has been taken from the site access points, it is unlikely to materially affect the conclusions drawn.

Regarding public transport, the TA refers to guidance set out in the IHT document 'Guidelines for Planning for Public Transport in Development', which confirms that new development should be located so that public transport trips involve a walking distance of less than 400m from the nearest bus stop or 800m from the nearest rail station.

As the TA confirms, the rail station is well over 1km from the site and the site cannot be considered to be well located for access by rail, based on the IHT Guidelines.

The TA confirms that the nearest bus stops are located on Whalley Road, less than 400m from the site, however, this is measured from the site access points. The TA also refers bus services that extend along Pendle Road, Peel Park Estate and other services around Clitheroe without confirming the distance to relevant bus stops.

However, given the scale of the development, a vast majority of the site will be a distance greater than 400m from the existing services identified, with some areas being around 1km from the nearest bus stop. The TA does suggest that the proposals will enhance public transport facilities and encourage services into the site, but there is no commitment that this will be delivered as part of the proposals or, indeed, that any preliminary discussions have taken place with local bus operators that would indicate a willingness to serve the site.

As such, the site cannot generally be considered to be accessible by bus.

We would also note that no reference is made to Lancashire CC's Accessibility Questionnaire.

The accessibility of the site for pedestrians has been considerably over-estimated and it has not been demonstrated that the site is or will be accessible by public transport, which could result in an over-reliance on the private car.

With regards to existing traffic flows, the TA advises that in order to identify the study area over which local highway assessment work will be undertaken, automatic traffic counter (ATC) sites were installed across Clitheroe.

In addition, turning count information was obtained for a number of junctions, via newly commissioned surveys or by reference to the previous Transport Appraisal prepared by Royal Haskoning.

It is not clear how, as suggested, the ATC information has been used to identify the study area, however, only eight junctions are subsequently considered for analysis, which would appear a small study area given the scale of development and given the scope of analysis required as part of other, smaller proposals in the Clitheroe area.

Notwithstanding the above, the turning count information is summarised in a series of figures, however, it is not clear whether the numbers are total vehicles or passenger car units, the standard unit for analysis. This could potentially impact on the results of the capacity assessments, i.e. have HGV proportions been properly accounted for?

As such, the TA provides an inadequate consideration of the potential traffic impact of the development.

Sustainable Development Opportunity

The TA advises that car parking will be in accordance with the standards set out in the North of England Plan Regional Spatial Strategy. However, it goes on to advise that in order to further (?) encourage sustainable travel and reduce reliance on the private car, appropriate travel plan initiatives will be implemented. This will, it is advised, set a number of targets in order to reduce reliance on the private car, which would be reviewed and updated when required.

Whilst this is welcomed, however, it is unclear how effective the possible measures identified in the Travel Plan Strategy will be in reducing reliance on the private car given, for example, the deficiencies in public transport accessibility highlighted above.

The TA refers to proposed improvements to the A59/Pendle Road/Clitheroe Road junction that would replace the existing staggered priority arrangement with a roundabout. It is assumed that this can be delivered on land within the adopted highway or within land controlled by the applicant.

The main vehicular access to the development will be via a mini-roundabout along Pendle Road. A secondary vehicular access will be provided onto Littlemoor Road, though it is stated that the use of this will be restricted to emergency access and buses (as well as pedestrians and cyclists). It is worth noting that, in our experience, Lancashire CC are reluctant to accept a mini-roundabout arrangement to serve residential development.

It is not clear from the indicative layout shown in Plan 9 or the description within the text how this will be restricted, but given the traffic impact analysis has been predicated on this basis it is essential that this restriction is secured as part of the planning process.

The TA states that the area identified for employment uses is some distance away from the main site access but that in order to allow this area to come forward as an early phase of development a temporary vehicular access could be constructed from Worston Old Road, which could ultimately revert to an emergency/pedestrian/cycle access.

We would note, however, that this part of the site is in excess of 600m from Pendle Road and is not, therefore served by bus services. Also, Worston Old Road does not benefit from footways and, as the boundary adjacent to Worston Old Road does not extend as far as Pendle Road, it would appear that a complete footpath link cannot be provided to Pendle Road. As such, the early release of development in this area would be particularly reliant on the private car.

In terms of trip generation associated with the proposed development, trip rates have been derived for the residential, employment, and primary school uses by reference to the TRICS database. Discounts have then been made to the traffic generations due to the proposed provision of a travel plan and an 'internalisation' discount.

It is not clear on what basis the assumptions for the internalisation discount have been derived. We would also note that the trip rates derived for the employment land are based on surveys of sites that, themselves, benefit from a Travel Plan. As such, a Travel Plan discount will be implicit in the trip rates used, and no reduction should be applied to the employment uses.

The analysis is therefore likely to underestimate the levels of traffic associated with the development.

Traffic Impact Assessment

Future assessment years of 2015 and 2030 have been considered, with traffic flows being factored using TEMPRO/National Traffic Model growth factors.

In terms of committed development, the TA refers to two planning consents - a 170 dwelling development on land off Primrose Road and a 270 dwelling development on land off Henthorn Lane.

We would also point out that a hybrid application (App. No. 3/2011/1064) for a total of 113 dwellings on two separate sites (known as Mearley Croft and Primrose Village Phase 2) was recently received and is minded to grant. The TA that accompanied this application was prepared by SBA.

The traffic associated with this development has not been accounted for, which will under-estimate the background levels of traffic.

The TA has referred to the trip distribution work carried out as part of the Royal Haskoning Transport Appraisal. This suggests that 60% of trips to work use the A59 with 'very few' passing through the town centre.

The development traffic has been assigned to the network on this basis, an increase in link flows determined. The TA suggests that an increase of around 460 trips to the south of the main site access and around 340 trips to the north of the main site access would occur during the weekday am peak. Similarly, an increase of around 400 trips would occur to the south of the main site access and around 280 trips to the north of the main site access would occur during the weekday pm peak.

However, given the analysis is likely to substantially underestimate the levels of traffic associated with the development, these figures are also likely to be underestimated.

The TA has also carried out capacity assessments of seven junctions on the local highway network together with the site access junction. As stated previously, it is not clear whether the traffic figures provided show vehicle numbers or PCU numbers. The capacity analysis does not appear to make any allowance for HGV numbers, however, the assessments could be underestimating traffic if the flows are shown in vehicle numbers.

In terms of the site access, we note that the analysis indicates that the mini roundabout arrangement operates around its practical design capacity during the am peak at 2015 and over its practical design capacity at 2030. It appears that the capacity assessment has, however, been undertaken using a flat profile but in order to ensure an appropriate design, we would suggest that a synthesised profile be used when in forming the design of the primary vehicular access. Notwithstanding this, the proposed site access junction should be designed to operate within capacity at 2030.

It is also not clear whether a mini roundabout arrangement could accommodate all anticipated vehicular movements.

With regards to the wider highway network, all junctions have been modelled as standalone junctions. The Waterloo Road/Shawbridge Street junction is shown to operate at capacity in the base scenario and over capacity in the with development scenario.

It is, however, important to recognise that the Waterloo Road/Wellgate junction and Shawbridge Street/Taylor Street junctions are both within approximately 30m of the Waterloo Road/Shawbridge Street junction, and there will be an interaction between the junctions which is not reflected in the modelling undertaken within the TA.

As the TA has clearly revealed the sensitivity the Waterloo Road/Shawbridge Street junction, we believe that the analysis does not accurately reflect the operation of this part of the network and that it should be looked at holistically.

Notwithstanding the above, the TA identifies at Plan 10 potential improvements to the junction, which comprise modest kerbline amendments. The TA then includes sensitivity capacity assessments of this arrangement.

In carrying out this analysis, it is stated that 'driver habit would alter in response to any localised traffic congestion' and that route choice may alter. As a result, an assumption has been made that 50% of residential and employment residential traffic to/from the Primrose ward is routed via Hayhurst Street or Goosebutts Street, as would all residential traffic to/from the Littlemoor ward.

Based on this, the TA concludes that the operation of the improved Waterloo Road/Shawbridge Street junction would be broadly in line with the base assessment.

Whilst some diversion of trips may occur, the assumptions made appear arbitrary and have not been agreed with Lancashire CC. In addition, no consideration has been undertaken of the impact this alteration of route choice may have on other junctions on the highway network. We understand that Whalley Road is well trafficked, and it cannot therefore be assumed that traffic using Hayhurst Street or Goosebutts Street will be able to rejoin their desired route without incurring delay or congestion.

There are, therefore, a number of deficiencies in the traffic impact analysis and it cannot therefore be concluded that traffic associated with the proposed development can be accommodated on the local highway network.

Conclusions

Based on a consideration of the Transport Assessment submitted in support of the proposed development at Standen Estate, Clitheroe, the following can be concluded:

- The accessibility of the site for pedestrians has been over-estimated and it has not been demonstrated that the site is or will be accessible by public transport, which could result in an over-reliance on the private car;
- The analysis is therefore likely to underestimate the levels of traffic associated with the development;
- The traffic associated with this development has not been accounted for, which will underestimate the background levels of traffic;
- There are, therefore, deficiencies in the traffic impact analysis and it cannot therefore be concluded that traffic associated with the proposed development can be accommodated on the local highway network.

As such, it can be concluded that the analysis is fundamentally flawed.