Land off Clitheroe Road, Whalley

Full Planning Application for the erection of 188 dwellings, means of access and associated works



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1. Introduction

- 1.1. This Planning Statement has been prepared by Savills Planning on behalf of the landowner THT & L&Q Developments LLP (Trafford Housing Trust) to support an application for residential development at land off Clitheroe Road, Whalley. The purpose of this statement is to assist Ribble Valley Borough Council (the Council) in its consideration of a detailed planning application for:
- 1.2. "The erection of 188 dwellings, means of access and associated works'.
- 1.3. Full planning permission is sought and the application therefore provides detail and certainty on important matters such as design and layout, which will establish the overall quality of the development. The application comprises the following documents:
 - Planning Statement (including Community Engagement Summary and Affordable Housing Statement) (prepared by Savills);
 - Preliminary Geo-Environmental Risk Assessment (Desktop) (prepared by Delta Simons);
 - Geo-Environmental Assessment (prepared by Delta Simons);
 - Ecology Appraisal incl. Bat Survey (prepared by Delta Simons);
 - Archaeological Geophysical Survey (Delta Simons);
 - Flood Risk Assessment (prepared by Civic Engineers);
 - Transport Assessment (prepared by Crofts);
 - Travel Plan (prepared by Crofts); and,
 - Design and Access Statement (incorporating Landscaping Strategy, Waste Management and Crime Impact Sections) (prepared by PRP).
- 1.4. The Application is also accompanied by a full pack of drawings. Please see the Drawing Register which accompanies the application for full details.

Pre- planning application Discussions & Community Engagement

- 1.5. Pre-planning application discussions were undertaken with Stephen Kilmartin at Ribble Valley Borough Council on 25 July 2018 and a formal written response was received to this process on 23 August 2018.
- 1.6. It is acknowledged through the previous grant of outline consent, draft allocation and subsequent inclusion of the site in the Council's Strategic Housing Land Availability Assessment (SHLAA) that the principle of residential development at the site is acceptable. The Council confirmed this during preapplication discussions by raising no objection to the principle of the proposed development.
- 1.7. During the pre-planning discussions with the Council, concerns relating to detailed separation and interface distances, dwelling orientation, landscape mitigation buffers and boundary treatments were raised. Where possible, these concerns have been reviewed and addressed within the revised layout.

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Structure of the Document

1.8. The remainder of this Statement sets out the case for the proposal and addresses the main issues identified in the pre-application response. It is structured as follows:

<u>Section 2: The Site and Surroundings and Planning History:</u> Describes the application site, and the relevant planning history.

Section 3: The Proposal: Details the proposals in terms of access, layout, design, scale and housing mix.

Section 4: Planning Policy: Provides a summary of the relevant national and local planning policies.

<u>Section 5: Assessment:</u> This Section considers how the proposals accord with the development plan and how they constitute Sustainable Development in the context of the National Planning Policy Framework (NPPF). In addition, this Section assesses the design, drainage/flood risk implications, ecological matters, crime prevention and Highways considerations.

<u>Section 6: Conclusions:</u> Our overall conclusions are set out in section 6 and the key benefits of the development are considered to be:

- The delivery of 188 new homes, which will contribute to the Council's housing delivery target.
- Provision of a range of properties improving the housing mix in the area, including family housing, accommodation for over 55s and apartments;
- A range of market, shared ownership and affordable homes; and,
- · Provision of new green infrastructure and enhancement of the sites existing assets
- Investment in the locality and increase spending in Whalley and the wider area.
- The creation of significant jobs and investment during the construction phase.
- A significant revenue boost to the Council, via Council tax receipts.

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2. The Site and Surroundings and Planning History

The Application Site

- 2.1. The application site is located on the edge of the settlement of Whalley on land known as Lawsonsteads and is currently accessed from Springwood Drive. The site is considered to be green field in nature, irregular in shape and extends to approximately 10.28 hectares. The site is broadly located between Clitheroe Road and the A671 and lies adjacent to Redrow Homes 'Lawson Rise' development.
- 2.2. The site is situated adjacent to the established residential area of Whalley and is therefore well connected in terms of amenities and transport infrastructure. Whalley Rail Station is approximately 0.5 miles to the west of the site which is also within easy access to the principal bus routes via the A59 and A671 road network.
- 2.3. Whalley Town Centre is located to the south west of the site and provides easy access to a range of services including a medical centre and a pharmacy as well as several bars and restaurants.
- 2.4. The application site is located within Flood Zone 1 and is therefore at a low risk of flooding. The site is not located within a Conservation Area and there are no listed buildings or structures within or adjacent to the site.

Planning History

- 2.5. The site has a comprehensive planning history, however the following applications are of most relevance:
 - 3/2013/0137 A residential mixed use development comprising up to 260 dwellings (C3), a primary school (D1), a new vehicular link between Clitheroe Road and the A671 including creation of a new junction both onto the A671 and Clitheroe Road, car parking, open space and associated landscaping. Granted 16/10/2013.
 - 3/2014/0043 Phase 1 reserved matters application (appearance, landscaping, layout, scale) for the erection of 54 dwellings pursuant to outline planning permission 3/2013/0137. Granted 17/04/2014.
 - 3/2015/0489 Reserved matters application following outline approval 3/2013/0137. Erection of 160 two, three, four and five – bedroom dwellings including the provision of 48 affordable dwellings. Granted 08/01/2016.

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3. The Proposal

3.1. Full planning permission is sought for the following:

"The erection of 188 dwellings, means of access and associated works."

3.2. A full set of plans has been submitted in support of the application, including proposed floorplans, elevations and vehicle routes.

Access

- 3.3. It is proposed to create two new access points to serve the development. One will be taken from the from the existing 'Lawson Rise' residential development on Springwood Drive. The other access point will be taken from the A671 (Accrington Road).
- 3.4. Residential parking will be provided in the form of in-curtilage parking spaces (some of which will be in the form of garages), at a rate of:
 - 1 bedroom: 1 space per dwelling;
 - 2 and 3 bedrooms: 2 spaces per dwelling; and,
 - 4 and 5 bedrooms; 3 spaces per dwelling.
- 3.5. A total of 361 parking spaces will be provided, including 4 dedicated visitor spaces.
- 3.6. A Transport Statement and Travel Plan accompany the application submission, and demonstrate that the proposed development will generate a lower level of traffic movements when compared to the previous outline planning consent on the site. Furthermore, the site has good accessibility by foot, cycle and public transport.

Layout

- 3.7. The proposed layout is designed to make best use of the site and reflects the principles established through the previous grant of outline planning permission at the site.
- 3.8. The site is naturally divided by the Public Right of Way and brook which extends from Brooke's Lane, with streets being designed to follow the differing topographical characteristics. In response to the site's physical constraints, residential development will therefore be developed in two sections.
- 3.9. The first development parcel essentially forms a natural continuation of Redrow's development whilst the second parcel is a natural infill of the land adjacent to the properties located off Woodlands Park and Sydney Avenue.
- 3.10. A substantial amount of open space is provided throughout the site and therefore respects the sites surroundings and relatively rural location. For further details please refer to the Design and Access Statement and site layout plan which accompany the application.

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Housing Mix

- 3.11. The proposal is for the redevelopment of the site for 188 dwellings consisting of:
 - 2 x 1 bed apartments;
 - 8 x 2 bed apartments;
 - 49 x 2 bed houses:
 - 80 x 3 bed houses:
 - 42 x 4 bed houses; and,
 - 7 x 4 bed houses.
- 3.12. The housing tenure will be as follows:
 - 131 Market sale properties; and,
 - 57 affordable properties (29 affordable Rent and 28 shared ownership).
- 3.13. 28 properties are also specifically designed and will be set aside for residents over the age of 55. The housing mix is explored in more detail in the Design and Access Statement.

Design

- 3.14. The submitted Design and Access Statement and accompanying drawing pack (produced by PRP) provides an overview of the approach and design ethos of the proposal.
- 3.15. As previously stated the scheme has evolved following the advice provided in the pre-planning application process undertaken with the Council.
- 3.16. The proposed dwellings present a façade treatment which is considered appropriate to its historic context whilst being sympathetic to the nearby Conservation Area. Variation within the street scene is provided through differing brick types, stone and render. An alteration of stone borders to windows on semi-detached plots between upper and lower windows is also proposed. To ensure a level of visual continuity along the primary frontage and to remain sympathetic to the existing dwellings context, a buff stone facing material will be applied to several of the plots along the road and facing towards the A671. Consideration has also been had to the materials utilised in the adjacent Redrow scheme to ensure that the proposed development sits properly alongside that development.

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4. Planning Policy Context

4.1. This section outlines the key planning policies of relevance to the determination of the planning application. Section 38(6) of the Planning Act 2004 requires that "where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise."

The National Planning Policy Framework

- 4.2. The National Planning Policy Framework (NPPF) was originally published in March 2012 before being revised in July 2018. The NPPF is a material consideration in determining planning applications (paragraph 2). The Government expects communities to plan positively to support sustainable development (paragraph 29). So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 10). It also follows that development plans, under the current plan-led system, ought to be consistent with the objectives, principles and policies now set out in the NPPF.
- 4.3. Plans should positively seek opportunities to meet the development needs of their area. The Framework details that development proposals which accord with an up-to-date development plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless:
 - The application of policies in this Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or
 - 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 (paragraph 11).
- 4.4. The NPPF seeks to encourage growth. Local planning authorities may take decisions that depart from an up-to-date development plan if material considerations in a particular case indicate that the plan should not be followed (paragraph 12).
- 4.5. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible (paragraph 38).
- 4.6. Paragraph 59 relates to delivering a sufficient supply of homes and states that:
 - "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific requirements are addressed and the land with permission is developed without necessary delay."
- 4.7. In relation to the need for new development, the NPPF sets out sets out three overarching objectives of the role of the planning system (paragraphs 7 and 8). Bullet point one of paragraph 8 relates to an

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economic objective, it states that the planning system should help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.

4.8. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).

The Development Plan and Planning Policy Framework

- 4.9. The Development Plan for Ribble Valley comprises the Ribble Valley Core Strategy 2008-2028 (adopted 2014). The statutory development plan is the starting point in the consideration of planning applications for the development of land, unless material considerations indicate otherwise (Section 38(6) Planning and Compulsory Purchase Act 2004). The application does not have any specific designation on the Proposals Map.
- 4.10. The Council's Core Strategy supports the delivery of new residential development (Policy DS1: Development Strategy), with 280 dwellings per annum sought to be delivered throughout the Plan period. Whalley (alongside Clitheroe and Longridge) is identified as a Principal Settlement which will be a focus for the majority of new housing development.
- 4.11. Policy DS2 relates to the presumption in favour of sustainable development and states that when considering proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPP and that planning applications that accord with the development plan will be approved without delay unless material considerations indicate otherwise.
- 4.12. Policy H1 (Housing Provision) states that the Council will seek to deliver at least 280 dwellings per annum.
- 4.13. Policy H3 relates to affordable housing and states that:

"In all other locations in the borough, on developments of 5 or more dwellings (or sites of 0.2 hectares or more irrespective of the number of dwellings) the council will require 30% affordable units on the site.

15% of the units will be sought to provide for older people on sites of 10 units or more. Within this 15% figure a minimum of 50% would be affordable and be included within the overall affordable housing threshold of 30%. The remaining 50% (ie the remaining 50% of the 15% older people's element) will be for market housing for older people."

- 4.14. Other relevant Core Strategy policies are as follows:
 - H2: Housing Balance;
 - DMI1: Planning Obligations;
 - DMI2: Transport Considerations;
 - DGM1: General Considerations; and,
 - DMG3: Transport and Mobility.

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Other Relevant Policy Documents

- 4.15. The Council are currently in preparation to produce a Housing and Economic Development Plan Document (HED DPD). The Plan is currently at the Examination in Public (Regulation 24) stage, having been submitted to the Secretary of State on 27 July 2017. It is anticipated that the plan will be adopted in late 2018 or early 2019.
- 4.16. The site is designated in the Council's draft HED DPD proposals map as being a Committed Housing Site (DS1). Although the Plan is not yet adopted, it is considered to be at an advanced stage and therefore can be given weight within the decision-making process.
- 4.17. The Housing Land Availability Schedule was published in October 2017 and provides an overview of historic completions, housing land supply and sites which benefit from extant planning permission. It is important to note that the schedule outlines a shortfall in delivery over the plan period of 649 dwellings. In respect of affordable housing completions over a ten year period to September 2017, the Council averaged a 56 affordable units a year.
- 4.18. There are no Supplementary Planning Documents (SPDs) of particular relevance.

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Assessment

- 5.1. This section will cover the following key matters:
 - The Principle of Development;
 - Affordable Housing Statement;
 - Planning Obligations & Community Infrastructure Levy;
 - Design, Heritage & Crime Prevention;
 - Amenity Space, Open Space, Trees and Landscaping;
 - Flood Risk & Drainage;
 - Ecology;
 - Highways, Transport and Accessibility;
 - Contaminated Land;
 - · Air Quality; and
 - Archaeology.

Principle of Development:

5.2. The principle of residential development at the application site is considered to be firmly established through the grant of outline planning permission as well as the sites identification in the emerging local plan as a committed housing site. The outline consent secured approval for up to 260 dwellings and therefore the quantum of development proposed (188 units) is well within the parameters established by the outline consent. The committee report which accompanied the outline consent (ref. 3/2013/0137) stated that:

"I have no issues with the location of the site in relation to the existing local plan boundary; if growth is to be accommodated then existing boundaries will need to change."

5.3. As detailed in the planning history section, two subsequent reserved matters approvals pursuant to the grant of outline consent were issued in 2015 and 2016, therefore confirming the acceptability of residential development at the application site. Furthermore, the Council identify the site as a committed housing development in the emerging HED DPD.

Housing Need & Housing Land Supply

- 5.4. The Government set out in 2015 a target to build one million new homes by 2020. This equates to 200,000 new homes per year over that period. More recently the Government have repeatedly stated that by the mid 2020's, 300,000 dwellings per annum should be delivered. This emphasis on increasing housing delivery is reiterated in Paragraph 59 of the NPPF which references the Government's objective 'of significantly boosting the supply of homes'.
- 5.5. At a local level Key Statement H1 of the Council's Core Strategy relates to Housing Provision and reiterates the need for new homes. It states that 5,600 dwellings will be delivered over the Plan period (2008-2028), at a rate of 280 dwellings per annum.

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- 5.6. Paragraph 73 of the NPPF states that 'Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old'.
- 5.7. The Council stated in November 2017 that it is able to demonstrate a 5.9 year housing land supply using the annualised Core Strategy requirement. Whilst the Council has identified a sufficient supply of housing, consideration should also be had to past delivery. The Council's most recently published evidence (The Housing Land Availability Schedule) demonstrates a shortfall in delivery over the plan period of 649 dwellings. This equates to a shortfall of approximately 70 dwellings per annum, approximately 25% of the Council's annual requirement.
- 5.8. Similarly, in respect of affordable housing completions over a ten year period to September 2017, the Council averaged 56 affordable units a year. This application proposes 57 affordable dwellings and would therefore on their own would meet affordable housing completions for recent years.
- 5.9. This statement does not seek to undertake a robust assessment of the Council's five year housing land supply. However, it is evident that the Council have not met their requirement historically and that this development will make a notable contribution towards delivering that requirement, particularly as the site forms part of the Council's housing land supply, having been identified as a Committed Housing Site.

Sustainable Development

- 5.10. Section 2 of the NPPF relates to Achieving Sustainable Development. Paragraph 8 states that the planning system has three overarching objectives an economic objective, a social objective and an environmental objective.
- 5.11. Paragraphs 10 and 11 relate to the Presumption in Favour of Sustainable Development. They state that the presumption in favour of sustainable development is at the heart of the planning framework. For decision-taking, this means "c) approving development proposals that accord with an up-to-date development plan without delay".
- 5.12. In respect of the economic benefits of the development, firstly the development will create investment in the locality and increase spending in Whalley and the wider area. Secondly, it will create significant jobs and investment during the construction phase. Finally the new dwellings will provide a significant revenue boost to the Council, via Council tax receipts.
- 5.13. In respect of social benefits arising from the development, the provision of housing and a contribution to the Council's housing supply is considered to weigh in favour of the proposal and will contribute towards the Council's objective of building cohesive communities. The proposals are fully compliant with planning policy and deliver an appropriate mix of both market and affordable housing, including both family homes and housing for those over 55 years old.
- 5.14. With regard to environmental benefits, the proposals incorporate a significant amount of public open space, the provision of soft landscaping, including significant tree planting. It is considered that the proposals will enhance the biodiversity credentials of the site.

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5.15. Given the location of the site, and its access to the Key Service Centre of Whalley and its associated local shops, services and transport links, the site is considered to be in a sustainable location. The sustainability credentials of the site have been demonstrated through the previous grants o planning permission.

Conclusion (Principle of Development)

- 5.16. The proposed development is considered appropriate for residential development for the following reasons:
 - The site benefits from planning permission and therefore forms a significant part of the Councils' identified housing land supply (the site is identified as a committed housing site in the emerging HED DPD).
 - It will deliver a variety of house types, capable of accommodating families, young people and the elderly.
 - It will contribute towards the Council's annual housing target and overall target for the Core Strategy Plan period by delivering significant amounts of both market and affordable housing.
 - It will concentrate new housing development within a sustainable and highly accessible location close to key services and well served by public transport.
 - Will not prejudice highways safety, including pedestrian safety, or free flow of traffic; and,
 - The proposals represent sustainable development in accordance with the NPPF definition.

Affordable Housing Statement

- 5.17. Trafford Housing Trust (THT) is Trafford's largest housebuilder. Through its development arm it has established a JV structure, with one of the largest housing associations in the UK, London & Quadrant (L&Q), namely THT and L&Q Developments LLP.
- 5.18. The LLP trades as Laurus Homes, investing an initial £160 million to underpin an ambitious development programme of 2,000 homes over the next four years across the North West of England. With the asset base, financial capacity and Executive ambition THT is developing outside of its traditional base of Trafford with immediate and strategic sites across the North West to underpin its core development expectation.
- 5.19. THT and L&Q are both registered providers who seek to deliver open market housing solely to cross subsidise an affordable and supported housing programme and to gap fund where no grant support is available. All profits that the LLP generates are re-invested in the LLP to underpin that objective and further the wider social values of the Trust, which at the core seeks to make a positive contribution to the vision of: "Striving for a society transformed, free from poverty, inequality and injustice".
- 5.20. In the period following its formation, THT's asset management activity was focused on delivery of a circa £136 million improvement programme to its housing stock over a five year period. Three years into what became an extremely successful stock regeneration programme, the remit was extended to enable participation in the Government's 2008/11 Affordable Housing Programme ("AHP"), creating 109 homes.

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- 5.21. Moving from strength to strength, THT was also successful in participating in the 2011/15 AHP and Affordable Homes Guarantee Programme ("AHGP") and this, together with some non-grant funded activity has resulted in the development of a further 255 homes and a number of commercial properties.
- 5.22. THT's three year development programme (2014/17) marked a step-change in the ambitions of THT to deliver more new homes and to generate funding for re-investment in affordable living and social value projects. The programme more than tripled the rate at which THT builds new homes to in excess of 200 per year.
- 5.23. Since the formation of the LLP in April 2017 sites across the North West have been acquired including:
 - Delamere Forest, Cheshire 166 homes;
 - Winsford, Cheshire 215 homes;
 - Heath Farm, Partington 576 homes;
 - Skelmersdale, Lancashire 299 homes;
 - White Lion, Stockport 11 homes;
 - Helsby, Cheshire 119
- 5.24. THT are currently concluding negotiations for additional sites in Greater Manchester, Cheshire and Lancashire for sites totalling in excess of 1,000 units.
- 5.25. Core Strategy Policy H3 relates to affordable housing and requires (Savills emphasis in bold):

"In all other locations in the borough, on developments of 5 or more dwellings (or sites of 0.2 hectares or more irrespective of the number of dwellings) the council will require 30% affordable units on the site.15% of the units will be sought to provide for older people on sites of 10 units or more. Within this 15% figure a minimum of 50% would be affordable and be included within the overall affordable housing threshold of 30%. The remaining 50% (ie the remaining 50% of the 15% older people's element) will be for market housing for older people."

5.26. The proposed development will deliver 188 units, of which 57 affordable units (29 affordable rent and 28 shared ownership). Therefore in line with Policy H3 30% of all units will be affordable. 28 units will be made available for persons over the age of 55, this represents 15% of the overall development and again complies with Policy H3. 16 of the 28 over 55 units would be affordable, equating to 57% percent. It is therefore clear, that the proposals are fully compliant with affordable housing policy and importantly that they will make an important contribution to addressing housing need in the borough.

Planning Obligations & Community Infrastructure Levy

5.27. A draft Heads of Terms will follow the submission of the application. However, pre-applications have taken place and covered potential contributions towards, leisure/play facilities and well educational places. It should however be noted that Redrow are delivering a play area (as part of the requirement of the outline planning permission) within the application site boundary, which was agreed to be of sufficient quantity and quality to meet the needs of the wider site (i.e. up to 260 dwellings).

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5.28. We understand that at this stage the Council have no intention to progress a Community Infrastructure Levy.

Design, Heritage and Crime Prevention

- 5.29. Matters relating to design, heritage and crime prevention are covered in detail in the Design and Access Statement which accompanies the application. The statement concludes that the proposals are appropriate in the context of the adjacent Conservation Area. Dwelling design has been developed in regard to the existing character of Whalley, and is considered to be sensitive to existing materials and building heights.
- 5.30. Whilst the scheme is not required to achieve Secured by Design, a strong frontage has been adopted with active ground floors to increase natural surveillance of the public realm. All dwellings front onto and have access from the street. It is therefore considered that the proposals provide a high quality and safe design in line with local and national planning policy.

Amenity Space, Open Space, Trees and Landscaping

- 5.31. The proposals incorporate dedicated areas of public open space (POS) which extend to 4.37ha. The provision of this is considered to be a significant benefit to the development which weighs in favour of the proposal. The scheme retains a significant proportion of open space, with large sections of POS being provided towards the north east and centre of the site. A country park is proposed, which will complement the playground which is to be provided by Redrow. The POS is therefore considered to be located in areas convenient to all residents.
- 5.32. The application is accompanied by a Tree and Hedgerow Survey Report and Tree Constraints Plan, prepared by Delta Simons. The report concludes that 17 trees, 8 tree groups and one woodland group have been identified. The mature and semi-mature trees on site are covered by a combination of Tree Preservation Order (TPO) No.1, 1857 and TPO No.3, 1962.
- 5.33. The report provides a series of recommendations, including that trees identified for retention will need adequate protection during construction works, and the provision of a method statement any works to trees assessed as having a Low Bat Roost Potential (BRP).
- 5.34. The application is accompanied by a Green Infrastructure Plan prepared by PRP Architects. The plan illustrates the location of retained, removed and new trees. It is considered that tree removal is expected to have a low to negligible impact on the character of the site and the local landscape. New tree and buffer planting is proposed to replace the loss of existing trees, and enhance existing provision.
- 5.35. The accompanying Green Infrastructure Plan illustrates areas of hard and soft landscaping. The site incorporates a variety of grassed areas, including open space grass and wild flora meadows. It is therefore considered that the development is in accordance with the principles of key national and local planning policy

Flood Risk & Drainage

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- 5.36. The application is accompanied by a Flood Risk Assessment (FRA) prepared by Civic Engineers. The application site is located in Flood Zone 1 and the assessment concludes that it has been demonstrated that the flood risk to the site is low. The FRA makes a number of recommendations in respect of mitigation, including the following:
 - Street and external works will be designed to direct overland flows away from property. The levels will
 be set such that overland flow (should it occur) will be directed to the corridor of open space at the
 centre of the site adjacent to the recently constructed attenuation basins.
 - Site levels in the south western corner of the southern section of the site will be raised such that the minimum ground floor level of any unit is 55.mAOD.
- 5.37. It is therefore considered that the development is in accordance with the principles of key national and local planning policy.

Ecology

- 5.38. Paragraph 170 of the NPPF states that planning policies and decisions should contribute to, and enhance the natural and local environment. This includes protecting and enhancing sites of biodiversity and minimising impacts on and providing net gains for biodiversity. Paragraph 8 also stresses the importance of sustainable development helping to improve biodiversity.
- 5.39. A Preliminary Ecological Appraisal has been produced by Delta Simons to accompany this application. This has considered the impact of the proposed development on protected species (including: birds, riparian mammals, bats, reptiles, amphibians, badgers and other fauna) and designated sites/habitats.
- 5.40. The PEA comprised a Phase 1 Habitat Survey and protected species assessment, together with a Bat Roosts Potential (BRP) Survey and a Badger Survey. The initial findings identified habitat or potential for bats, and therefore an additional bat survey was advised.
- 5.41. Further surveys were therefore produced by Delta Simons to accompany the application. These concluded that the site has potential opportunities for bats, nesting birds, badgers and hedgehogs.
- 5.42. The Appraisal identifies a number of construction and operational phase recommendations and enhancement measures including appropriate working methodologies. It is advised that two further nocturnal surveys are undertaken should any works be undertaken within 5m of the pedunculate oak. It is considered that these measures (or the overall findings of the report generally) could be conditioned by the Council if deemed necessary. It is therefore considered that the proposals comply with Core Strategy Key Statement EN4.

Highways, Transport and Accessibility

5.43. The application is accompanied by a Transport Statement and Travel Plan prepared by Crofts. The reports conclude that the proposed development will be accessed by a safe and efficient vehicular access arrangement. The development site is considered to be very well situated to encourage trips by public transport, and is easily accessible by foot and cycle. The proposed development will also generate a lower level of traffic movements when compared to the previous outline planning consent on the site.

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- 5.44. The site's original outline consent included conditions related to highways, some of which have been discharged and works undertaken as part of the Redrow scheme. Trafford Housing Trust will provide the remainder of works, including a new vehicular access onto the A671 (previous conditions 11 and 12) and the completion of a link road between Clitheroe Road and the A671 (some of which has already been provided by the Redrow scheme).
- 5.45. The proposals will also include a range of agreed off site highway works and contributions to provide substantial benefits to the operation of the local highway network. This includes the relocation of bus stops and the provision of bus shelters and a Toucan crossing.
- 5.46. Safe pedestrian movement will be enabled through both existing and proposed pedestrian infrastructure. Vehicle speeds will be reduced within the site by junction tables, and this will allow safe movement between the site and local services within Whalley. Footway provision will be well-lit and overlooked, enhancing safety.
- 5.47. Swept path analysis has indicated that the site layout can accommodate the manoeuvrings of a large 3 axle refuse vehicle, which will facilitate waste collection within the site.
- 5.48. The accompanying Framework Travel Plan encourages a reduction in reliance on the private car. Measures including car sharing, public transport, cycleways and footways will be implemented to reduce the number of single car occupancy trips, and to enhance existing access and encourage sustainable modes of transport.
- 5.49. The proposals are therefore considered to comply with local and national planning policy, in respect of highways, transport and accessibility.

Contaminated Land

- 5.50. The application is accompanied by a Preliminary Geo-Environmental Risk Assessment and Geo-Environmental Assessment. The reports consider that there are no contaminants which exceed the relevant Generic Assessment Criteria in regard to Human Health. Sources of contamination are reported to be absent within soils, pollutant linkage is considered unlikely and no gas protection measures are required.
- 5.51. The Geo-Environmental Assessment provides a number of recommendations for supplementary works. If required, a suitably worded condition in relation to further works and remediation can be agreed with the Council. On this basis, it is considered that the proposals are in accordance with both national and local policy.

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Air Quality

- 5.52. The application is accompanied by an Air Quality Assessment prepared by Delta Simons. The assessment states that residual effects of emissions to air from construction vehicles on local air quality is considered to not be significant. The resultant impact of operational phase traffic is considered negligible and similarly, the residual effect of air quality on future occupiers of the proposed development is also judged to be not significant.
- 5.53. The assessment therefore concludes that the residual effects of the proposed development are considered to be not significant for all pollutants assessed. The proposal is therefore compliant with both local and national planning policy.

Archaeology

5.54. The application is accompanied by a Geophysical Survey Report prepared by Magnitude Surveys for Salford Archaeology. The assessment concludes that a number of anomalies of possible archaeological origin have been identified, but that these cannot be confidently classified without further information. If required, a suitably worded condition in relation to further works can be agreed with the Council.

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6. Summary & Conclusions

- 6.1. This planning statement has been prepared by Savills Planning on behalf of THT & L&Q Developments LLP to support the application for residential development at land off Clitheroe Road, Whalley. The contents of this statement and the other reports which accompany the application have demonstrated that the proposal will create a high quality and well-designed development which will contribute to the Borough's housing supply, including the delivery of a significant amount of affordable housing.
- 6.2. In addition to meeting an identified housing need by delivering 188 new homes, the proposed development accords with the three dimensions of sustainable development a set out at Paragraph 8 of the National Planning Policy Framework, by performing a positive economic, social and environmental role.
- 6.3. From an economic perspective the scheme will deliver a number of economic benefits, both during and post construction. During the construction period a significant number of on-site and off-site jobs in construction related industries will be supported over the build programme.
- 6.4. The developer has a strong track record in respect of providing training opportunities and apprenticeships during construction, providing opportunities for the local workforce. In the longer term the residents of the scheme will increase spending in the local economy, helping to sustain jobs. The Council, will also benefit from additional annual council tax receipts.
- 6.5. As detailed previously, the proposals will result in the creation of a vibrant and healthy community, by increasing the supply of housing type and tenure to meet local needs, in a sustainable location. The proposals are considered to provide an appropriate of mix of housing for both families and those wishing to purchase their first home. The proposals also provide areas of public realm and private amenity space. The site is in a highly sustainable location within walking distance of a number of key services.
- 6.6. The proposals will enhance the overall character of the area and provide an improvement in the amount of useable open space, in the process enhancing the biodiversity credentials of the site.
- 6.7. The key benefits of the proposals are considered to be:
 - The site benefits from planning permission and therefore forms a significant part of the Councils' identified housing land supply (the site is identified as a committed housing site in the emerging HED DPD).
 - It will deliver a variety of house types, capable of accommodating families, young people and the elderly.
 - It will contribute towards the Council's annual housing target and overall target for the Core Strategy Plan period by delivering significant amounts of both market and affordable housing.
 - It will concentrate new housing development within a sustainable and highly accessible location close to key services and well served by public transport.
 - It will not prejudice highways safety, including pedestrian safety, or free flow of traffic.

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- The proposals represent sustainable development in accordance with the NPPF definition.
- The investment in the locality and increase spending in Whalley and the wider area.
- The creation of significant jobs and investment during the construction phase; and
- It will provide a significant revenue boost to the Council, via Council tax receipts.
- 6.8. It is considered that there are no other material considerations which would preclude the granting of planning permission for residential development on this site.