



Higher College Farm, Lower Road, Longridge PR3 2YY

Outline Planning Application for up to 21 no. Self-Build Dwellings

PLANNING STATEMENT (INCLUDING UTILITIES STATEMENT, SUSTAINABILITY STATEMENT & TRANSPORT STATEMENT)

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PWA Planning is a trading name of Paul Walton Associates Ltd.
Registered in England and Wales no. 8605706. Registered Address:
316 Blackpool Road, Fulwood, Preston PR2 3AE

2 Lockside Office Park
Lockside Road
Preston
PR2 2YS

01772 369 669
info@pwaplanning.co.uk
www.pwaplanning.co.uk

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Primary Author:	Joe Davis	Initialled:	JD
Contributor:	Rachael Leather	Initialled:	RL
Reviewer:	Daniel Hughes	Initialled:	DH

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/1 INTRODUCTION

- 1.1. PWA Planning is retained by Mr. Mark Hurst ('the Applicant') to progress an outline planning application with all matters reserved save for access, for up to 21 no. self-build dwellings ('the proposed development') at Higher College Farm, Blackburn Road, Longridge PR3 2YY ('application site'). This Planning Statement's purpose is to assess and conclude on the acceptability of the proposal in terms of relevant national and local planning policy, along with any material considerations.
- 1.2. The planning application is made to Ribble Valley Borough Council ('the Local Planning Authority') as an outline application and relates to the red edge application site boundary defined by the submitted Location Plan (**ref. 5296_E-Location Plan_2018.11.21**). The proposed development is to be situated on land associated with Higher College Farm, Blackburn Road, Longridge.
- 1.3. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The Planning Statement will demonstrate that the proposals accord with the provisions of the relevant policies of the Development Plan, and moreover that there are other significant material considerations which indicate that planning permission ought to be granted. In addition, the statement will seek to demonstrate that there are no technical reasons which could hinder the grant of planning permission.
- 1.4. This statement should be read in conjunction with the submitted application package, which includes the following documents: -
 - 1 APP form, relevant certificates and notices;
 - Drawn information: -
 - Location Plan (ref. 5296_E-Location Plan_2018.11.21);
 - Existing Site Plan (ref. 5296_E01_Existing Site Plan_2018.11.21);

- Illustrative Proposed Site Plan (ref. 5296_P01_A_Illustrative Site Layout_20181115);
- Planning Statement (this document; including Utilities Statement, Sustainability Statement and Transport Statement);
- Design and Access Statement;
- Proposed Access Plan;
- Bat Survey;
- Ecological Appraisal;
- Flood Risk Assessment and Drainage Strategy;
- Arboricultural Constraints Appraisal.

1.5. The remainder of this report is structured as follows: -

- Section 2 - Site Description;
- Section 3 - Proposed Development;
- Section 4 – Utilities Statement and Sustainability Statement;
- Section 5 - Planning Policy Assessment;
- Section 6 - Material considerations;
- Section 7 - Conclusions.

/2 SITE DESCRIPTION

- 2.1. The application site, which extends approximately 1.1ha in size, is located at Higher College Farm, on the eastern periphery of Longridge settlement boundary. The site currently comprises an area of land used for pasture together with the wider site, to the south, consisting of a domestic dwelling and outbuildings at Higher College Farmhouse. However, as discussed below, the site benefits from an extant planning permission for commercial uses (B1, B2, B8). An aerial image below illustrates the site and its wider setting in Figure 1.



Figure 1: Aerial image of the site (edged in red) and surroundings (Google 2018)

- 2.2. The site is bounded to the north by Blackburn Road (B6243) which runs in an east to west direction. To the west the site it abuts a hedgerow lined track leading to Higher College Farmhouse located to the south of the site, beyond which lies a range of commercial buildings used by Clegg's Chilled Food Service and Anderton's Ribble Butchers for food processing, packaging and distribution, along with external parking

and servicing areas. To the east is a roadway leading to the food processing businesses, beyond which lies agricultural land which has extant planning permission for employment floorspace (Use Class B1, B2 and B8) under planning application ref. 3/2017/0317.

- 2.3. The application site is located on the eastern edge of Longridge, which has a broad range of facilities, that includes Berry Lane Medical Centre located approximately 1.1km from the site and Drakes Dental Care located approximately 1.4km from the proposed development. Longridge Church of England Primary School, Longridge High School and St Cecilia's RC High School are all located within 1.5km of the site. Booths and Aldi supermarkets are located within 2km of the site. The proposed development is located off the B6243, meaning the site is easily accessible by car and close to local bus routes. The nearest bus stop is located opposite the Corporation Arms, 0.16km away from the site, which provides services to Blackburn, Clitheroe, Ribchester and also the centre of Longridge, where services to wider areas can be accessed. The residential development approved directly north of the application site, will provide new bus stop on Blackburn Road (B6243).
- 2.4. The current access to the site is located along the western boundary of the site which is taken directly from Blackburn Road.
- 2.5. There are no listed buildings within the site and by reference to the Environment Agency's flood risk map, it does not fall within an area subject to flooding. The site is located within Flood Risk Zone 1 which has a low probability of flooding. The site is located within the Open Countryside Area, as defined Ribble Valley Borough Council's Proposals Map. The Forest of Bowland AONB lies approximately 1km to the north of the site.

Relevant Planning History

- 2.6. A search of Ribble Valley Council's planning register has been carried out to understand the planning history relevant to the site and the proposed development. On the proposed site, an application was made on 28th June 2017 (application ref.

3/2017/0602) for outline planning permission for industrial units (use classes B1, B2, B8) and associated access, parking, landscaping and services infrastructure with all matters reserved except access and change of use of farmhouse to office (B1). The application was approved 1st December 2017. The approved floorspace, as part of this application was 2592m² of new floorspace with 476m² provided as part of the change of use.

2.7. In addition, the following planning applications have been made relating to the neighbouring areas:

- **Ref no. 3/2008/0268** *Higher College Farm rebuilding existing outbuildings to form an extension to the existing dwelling.* Approved 19/05/2008.
- **Ref no. 3/2006/0195** *Higher College Farm closure of existing access and provision of new access off existing access of Lower Road.* Approved 21/04/2006.
- **Ref no. 3/2017/0317** *Land South of Blackburn Road, Outline Planning application for Employment Floorspace (use Class B1, B2, B8).* Approved 04/09/2017.

/3 PROPOSED DEVELOPMENT

- 3.1. The application proposes to develop land to the south of Blackburn Road, Longridge, for up to 21 no. self-build dwellings. The application is submitted in outline with access, saving all other matters for subsequent approval through reserved matters.
- 3.2. The access will comprise a priority junction with Blackburn Road centrally located at the frontage of the site. The access point remains the same as the previously granted permission for application no. 3/2017/0602. A spine road is proposed into the site to access the properties. The plans proposed are for illustrative purposes only but help to demonstrate that the site can be developed in a manner consistent with self-build concepts, the type of vernacular local to Longridge, and in a manner that amenity of properties on the site, and the surrounding area would not be compromised.
- 3.3. The proposed development will deliver 6 self-build affordable dwellings (28.5%) and will provide a financial contribution to cover the minor shortfall (1.5%) in meeting the 30% requirement. The design of the development also incorporates Public Open Space located centrally within the proposed development, which is illustrated on plan **ref. 5296_P01_A_Illustrative Site Layout_20181115**.
- 3.4. Based on the extant planning permission, it is considered that the proposed development would have minimal landscape impacts, with the amount of built element on the site being similar to what could be built through the extant planning permission. Furthermore, when taking into account the massing and scale of a residential housing scheme, versus that of the commercial scheme proposed, it is considered the proposal would be more suitable to the surrounding context, assimilating itself well to the existing landscaping.
- 3.5. It is deemed that the proposal will not result in an unacceptable impact on highway safety and that the traffic movement of the residential dwellings will be fewer than those calculated for the extant planning permission at the site, therefore the transport statement submitted as part of the extant planning permission (application ref.

3/2017/0602) has been included within the Appendix A. The Highways Officer for the extant planning permission considered that the development would be unlikely to result in any highway capacity or safety concerns. Whilst this application is submitted in outline, it is proposed that that dwellings will include their own private driveway with garage.

- 3.6. All detailed matters, such as the appearance, landscaping, layout and scale, will be provided for as part of any future reserved matters application. However, as indicated on the submitted site layout, the proposal would provide for a similar amount of floor space to that approved as part of the extant permission.

/4 UTILITIES STATEMENT AND SUSTAINABILITY STATEMENT

Utilities Statement

- 4.1. As part of the planning submission, a drainage strategy has been undertaken which demonstrates that a suitable drainage scheme can be developed and accommodated within the surrounding infrastructure. In this regard, the site benefits from an extant planning permission for an industrial development. This proposed development would deliver up to 21 no. dwellings and as such would have less of an impact on the surrounding infrastructure than the extant planning permission. It is considered that the proposed development can be accommodated within the surrounding utility infrastructure.

Sustainability Statement

- 4.2. This site is sustainably located on the boundary of Longridge, which will provide the development with access to local amenities, including Berry Lane Doctors and Drakes Dentists located within 2km of the site. Longridge Church of England Primary School and Longridge High School are both located within 2km of the site. As the site is located on the B6243, the site has access to transport amenities, with the nearest bus stop located 0.2km from the site. Everyday facilities are within walking distance from the site, in addition, more facilities and services are available elsewhere within Longridge, which can be accessed via bus services opposite the site.
- 4.3. The properties will be designed to meet the current building regulations with regards to thermal efficiency and energy consumption. The construction process will source local materials and suppliers which will reduce transport emissions both to and from the site. Furthermore, as illustrated within the drainage strategy the use of SUDS will help to ensure a sustainable and environmentally friendly development.

/5 PLANNING POLICY ASSESSMENT

5.1. Section 38(6) of the Planning and Compulsory Purchase 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".

5.2. In this instance, the statutory Development Plan for the application site comprises of the Ribble Valley Local Plan adopted on 16th December 2014 and the Ribble Valley Core Strategy 2008-2028, whilst the emerging Ribble Valley Housing and Economic Development Development Plan Document (HED-DPD), NPPF, PPG and the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) are material considerations.

5.3. Currently the proposal maps published within the now replaced Districtwide Local Plan remains adopted, until the revised set of plans that are being produced as part of the HED DPD becomes adopted. There remains an unresolved objection to the settlement boundary of Longridge within the emerging HED DPD, however in the Districtwide Local Plan Proposals Map (1998) the site is located in the open countryside and falls just outside of the settlement boundary of Longridge. It is however considered that the boundaries of the settlements are out of date and need to be properly updated, through the HED DPD, if the housing needs of the Borough are to be properly met. It is contended that the settlement boundary of Longridge should not be a definitive consideration, and given the extant permission on site, along with that to the east and north, the land clearly functions as part of the settlement.

Development Plan

Ribble Valley Borough Council Core Strategy 2008 – 2028

5.4. The Ribble Valley Borough Council Core Strategy 2008 – 2028 was adopted in December 2014 and therefore can broadly be regarded as containing relevant and up to date policies in the consideration of this application. Furthermore, the following policies are considered to be relevant to the determination of the application, however they will be afforded weight in accordance with their consistency with the NPPF and this is discussed further in the Material Considerations section of the statement: -

- *Key Statement DS1: Development Strategy;*
- *Key Statement DS2: Sustainable Development;*
- *Key Statement EN2: Landscape;*
- *Key Statement EN4: Biodiversity and Geodiversity;*
- *Key Statement H1: Housing Provision;*
- *Key Statement H2: Housing Balance;*
- *Key Statement H3: Affordable Housing;*
- *Policy DMG1: General Considerations;*
- *Policy DMG2: Strategic Considerations;*
- *Policy DME1: Protecting Trees and Woodlands;*
- *Policy DME2: Landscape and Townscape Protection;*
- *Policy DME3: Site and Species Protection and Conservation;*
- *Policy DME4: Protecting Heritage Assets;*
- *Policy DMH3: Dwellings in the Open Countryside & the AONB;*
- *Policy DMB4: Open Space Provision; and*
- *Policy DMB5: Footpaths and Bridleways.*

5.5. **Key Statement DS1** seeks to outline the locations in which growth will be focused. Whilst the Statement refers to strategic sites already allocated for development, it also infers that in addition to the allocated sites the majority of housing development will be

located within the Borough's principal settlements, one of which is Longridge. The site has a functional relationship with the settlement by virtue of its proximity, ease of access, extant planning permission and its interaction with other developments both within and outside the formal settlement boundary.

- 5.6. The policy states that development in all settlements will be considered acceptable if it demonstrates regeneration benefits and are '*appropriate for consolidation and expansion or rounding-off of the built-up area*'. Therefore, whilst the site is on the periphery of the settlement the proposal offers the opportunity to contribute to the housing supply within Longridge in a manner which interacts well with adjacent development, such as the housing development opposite the site on Tootle Green. The proposal constitutes development in an area close to the existing settlement of Longridge representing a scheme far preferable to sporadic development in more rural areas or smaller 'Tier 1/2' settlements. Furthermore, the site is an obvious and logical extension to the existing settlement boundary and allows for the rounding off residential development whilst delivering a high-quality, appealing, development, but would also help meet the housing need in Longridge.
- 5.7. Finally, the development will also help meet an identified local need for a specialist type of self-build / custom-build accommodation, as required by the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016). The Council in this respect has a statutory duty to help provide for such developments.
- 4.8 **Key Statement DS2:** Sustainable Development looks to mirror Paragraph 11 of the NPPF which details the sustainable development principle that seeks to guide both authorities and developers. The Statement details that:

"When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the Framework. The Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure

development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and where relevant, policies in the neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise."

4.9 As discussed further within this statement, it is considered that the development can be considered sustainable development and therefore acceptable in the terms of this policy.

4.10 **Key Statement EN2:** Landscape, mainly focuses on protection of the Forest of Bowland AONB through ensuring development contributes to the conservation of the area by enhancing and protecting the landscape and character. The statement does offer more general coverage by linking the policy to the protection of all landscapes outlining that the Council expects all development to be in-keeping with the character of the local landscape.

5.13. In the Council's justification for the policy they state that:

"The Council will also seek to ensure that the open countryside is protected from inappropriate development. Developers should adopt a non-standardised approach to design which recognises and enhances local distinctiveness, landscape character, the quality of the built fabric, historic patterns and landscape tranquility."

5.14. Although the proposal is for an outline application at this stage, the proposal would seek to use materials that are sympathetic to surrounding development and landscape. Furthermore, as previously discussed, the impact on the surrounding landscape is considered to be minimal, and if anything, an enhancement on the extant permission at the site.

- 5.15. **Key Statement EN4:** Biodiversity and Geodiversity outlines that development should look to conserve and enhance the local biodiversity and geodiversity and any negative impacts should be avoided. The policy is in place mainly to add further protection to designated sites of environmental and ecological importance, of which the site is not. However, the overriding theme is that development should be able to mitigate any perceived negative impacts. Within the supporting documents which accompany this statement are both an ecological survey and a tree survey. These reports serve to demonstrate the impact, if any, the development will have but also outline relevant mitigation to ensure the acceptability of the proposal. Based on the report's findings it is concluded that the proposal can be delivered in a manner which is not at conflict with Key Statement EN4.
- 5.16. **Key Statement H1** focuses on housing provision; it states that the requirement for new homes will be delivered in line with the Council's Strategic Housing Land Availability Assessment. Further to this it states the Council will adopt a 'plan-monitor-manage' approach to ensure a rolling five-year land supply is achieved and maintained.
- 5.17. The subsequent statement **Key Statement H2:** Housing Balance, follows on from the above to outline that planning permission will be granted when the proposal is in line with local demand as evidenced in the Strategic Housing Market Assessment (SHMA). In addition, the development will also help meet an identified local need as required by the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016). The Council in this respect has a duty to provide consent for such developments, as self-build requirements should form part of the SHMA.
- 5.18. **Key Statement H3:** Affordable Housing, outlines the requirement for development to deliver affordable homes within residential developments. The policy states that within settlement areas there is a contribution requirement of 30% on schemes of 10 dwellings or more, whilst in rural areas the threshold is lowered to proposals of 5 or more dwellings. The proposed development will also deliver 6 self-build affordable dwellings (28.5%) and

will also provide a financial contribution to cover the minor shortfall (1.5%) in meeting the 30% requirement.

5.19. **Policy DMG1:** General Considerations assists in ensuring that development proposals are in line with numerous broad criteria by providing a series of overarching considerations regarding the quality of developments. The policy categorises the criteria under 6 headings which are as follows:

- Design;
- Access;
- Amenity;
- Environment;
- Infrastructure;
- Other.

5.20. The design of the proposed scheme is thought to be well-considered and of a high standard that both provides a quality addition to the local housing mix whilst being reflective and sympathetic to local character.

5.21. The policy states that in relation to access any proposals are required to be safe and suitable, with sufficient justification in relation to any potential traffic implications. It is thought that the introduction of the dwellings will not generate any perceptible impacts which would render the use of the access unacceptable. In this respect, the access has been approved through the extant planning permission for commercial uses. It was considered to be safe in that instance, with the residential use proposed as part of this application considered to be far less intrusive. Furthermore, the development will provide sufficient parking space ensuring there is no need for vehicles to park on the access track and potentially cause obstruction.

5.22. **Policy DMG2** outlines further strategic considerations. The policy assists in the interpretation of the Development Strategy and underpins the settlement hierarchy for the purposes of delivering sustainable development. Part 1 The policy states that:

"Development proposals in the principal settlements of Clitheroe, Longridge, and Whalley and the Tier 1 villages should consolidate, expand or round-off development so that it is closely related to the main built up areas, ensuring this is appropriate to the scale of, and in keeping with, the existing settlement."

5.23. The proposed development would consolidate development in this part of Longridge adding to the existing developments in the area, so that it is closely related to the main built up areas of the town. It would also be of an appropriate scale and in keeping with the existing settlement. The proposals would therefore be consistent with Policy DMG2.

5.24. Whether the site is deemed to be part of the open countryside or not, the type of proposal would be supported through the application of this policy. In this regard the other part of DMG2 states that:

"Within the Tier 2 villages and outside the defined settlement areas development must meet at least one of the following considerations:

- 1. The development should be essential to the local economy or social well being of the area.*
- 2. The development is needed for the purposes of forestry or agriculture.*
- 3. The development is for local needs housing which meets an identified need and is secured as such.*
- 4. The development is for small scale tourism or recreational developments appropriate to a rural area.*
- 5. The development is for small-scale uses appropriate to a rural area where a local need or benefit can be demonstrated.*
- 6. The development is compatible with the Enterprise Zone designation."*

- 5.25. The proposal does indeed provide for local needs housing, as required by the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016). It is quite clear that such housing does represent a specific local need and is, in part at least, evidenced by the self-build register which must be kept by the Council. Moreover, the Council in this respect has a statutory duty to help support and grant planning permission for such self-build / custom-build housing developments.
- 5.26. **Policy DME2:** Landscape and Townscape Protection states the proposals which induce significant harm to important landscapes or landscape features will not be supported. Such features are outlined as including:
- *"Traditional Stone Walls.*
 - *Ponds.*
 - *Characteristic Herb Rich Meadows and Pastures.*
 - *Woodlands.*
 - *Copses.*
 - *Hedgerows and Individual Trees.*
 - *Townscape Elements such as the Scale, Form, and Materials that Contribute to the Characteristic Townscapes of the Area.*
 - *Upland Landscapes and Associated Habitats Such as Blanket Bog.*
 - *Botanically Rich Roadside Verges (That are Worthy of Protection)."*
- 5.27. The proposal is an outline submission at this stage, but the proposed scheme will take into account all features outlined above when designing the development in order to safe guard the landscape of the site and the surrounding areas.
- 5.28. **Policy DME3:** Sites and Species Protection and Conservation, follows on from the above. As with DME2 it seeks to protect elements of any proposal site which have notable value, with a focus on relevant ecological designations such as Special Protection Areas and Site of Special Scientific Interests (SSSI). Further to this it also places emphasis on the protection of priority habitats. The development site is not covered by any local or national ecological designations and the accompanying ecological

assessment has outlined various migration measures which ensure the site would not be at contravention of the aforementioned policy.

5.29. **Policy DMH3:** Dwellings in the open countryside outlines that residential development within the open countryside will be limited to the following:

- *"Development essential for the purposes of agriculture or **residential development which meets an identified local need**. In assessing any proposal for an agricultural, forestry or other essential workers' dwellings a functional and financial test will be applied;*

5.30. As previously indicated, the development will help to meet an identified local need (a test set by the policy) as required by the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016). The Council in this respect has a duty to help promote and grant consent for such developments, and therefore the development is considered to meet the requirements set out in the policy. The scheme is therefore presumed to be consistent with Policy DMH3, even assuming that the site is ultimately determined to fall within the open countryside.

5.31. **Policy DMB4** Open Space Provision is in place mainly to respond to much larger schemes than the proposal at hand but does detail that on a site by site basis the Council may look to negotiate for open space provision on smaller sites where the overall level of supply is inadequate. It is considered that due to the modest scale of the proposal, along with the proposed open space which will be developed as part of the scheme north of Dilworth Lane (application ref. 3/2015/0065), access to Public Open Space is readily available. However, the scheme has included additional onsite Public Open Space as indicated on the Illustrative Layout (**ref. 5296 - P01-A-Illustrative Site Layout_2018.11.15**). If the Council find, during the determination period, that further requirements exist the applicant is willing to consider an appropriate response to the matter.

5.32. **Policy DMB5:** Footpaths and Bridleways, looks to ensure the retention, maintenance and improvement of the public rights of way network. The proposal at hand would not lead to the blocking, diversion or closure of any PROWs and as such it is not believed that the development conflicts with the policy. However, a footpath is located adjacent to the eastern boundary of the site (3-23-FP 23) but will not be affected as part of the proposed development.

/6 MATERIAL CONSIDERATIONS

National Planning Policy Framework (2018)

- 6.1. The NPPF is a material consideration in planning decisions as per Paragraph 2 of the Framework and Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 6.2. The NPPF sets out Government planning policies for England and how these are expected to be applied. The golden thread running throughout the NPPF is the Government's presumption in favour of sustainable development (Paragraph 11) whereby proposed developments which correctly balance the requirements of economic, social and environmental issues should be granted planning permission unless there are strong reasons that permission should not be granted. The NPPF also strongly supports economic and housing development.
- 6.3. Sustainable development is broadly defined in Paragraph 8 of the Framework as having three overarching objectives:
- *a) an economic objective – to 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; and by identifying and coordinating the provision of infrastructure;*
 - *b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - *c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising*

waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 6.4. In terms of economic benefits, the proposal would make a positive contribution to housing land supply in the Ribble Valley Borough Council area and the settlement of Longridge. The scale of the development is in keeping with the locality and will clearly provide a significant economic boost locally through the development of up to 21 new self-build homes. The self-build nature of the dwellings means that there is a strong prospect that individual householders will employ local tradesmen and contractors to complete the construction work and that the overall impact on the local economy will be more marked than for the volume housebuilders.
- 6.5. The social aspect of sustainability is met, in that the proposal will result in the creation of a high-quality environment and comprises a compatible use in keeping with the neighbouring uses in the immediate surrounds of the site. The development will contribute to the general market availability and as outlined earlier in this statement the site lies just on the periphery of defined settlement boundary of Longridge and therefore offers a location with excellent access to local services. The proposed vehicular access to the new dwellings will be taken from Blackburn Road. Additionally, with the site's accessibility to the areas associated bus services, the development can promote the use of sustainable transport modes and reduce reliance on the private car.
- 6.6. Turning to the environmental aspect of sustainability, the site is not subject to any statutory ecological designations, Tree Preservation Orders, Heritage assets or protected species. It is not within an area at risk of flooding as defined by the Environment Agency. Moreover, the scheme will provide the opportunity to provide increased environmental benefits for the site and the wider area and these benefits will be explored more fully within any subsequent reserved matters submissions.
- 6.7. Section 5 of the NPPF sets out the Government's objective of significantly boosting the supply of housing. As **Paragraph 73** identifies, local planning authorities should

identify a minimum of five years' worth of housing against their adopted housing requirement. **Paragraph 11** also states that relevant policies for the supply of housing should not be considered up-to-date if the LPA cannot demonstrate a five-year supply of deliverable housing sites. In such instances, applications for housing development should be looked upon favourably in the context of sustainable development.

- 6.8. The section and paragraphs are directly relevant to the determination of the Proposed Development given it is the consideration of PWA Planning that the Council at best has a very marginal housing land supply based, but more importantly the Council cannot meet its housing need for Longridge as set out in the Core Strategy and as such, sites adjacent to the Council's principal settlements such as this site, represent sustainable development as sought by national planning policy.
- 6.9. In this respect, it is considered that there has been an undersupply of housing completions in Longridge during the Plan Period, and therefore there is a need to significantly increase this in coming years in order to meet the minimum housing target in Longridge and deliver the Core Strategy (Paragraph 4.12 of the Core Strategy). This is based on a completion figure for Longridge and Longridge Parish, at September 2018, of 316 dwellings, with 642 to be built up to March 2028. There are just over 9 years left of the Core Strategy period, and in order to meet the minimum during this period, a completion rate of 69 dwellings per annum is required. The completion rate to date from the start of the Core Strategy, for comparison, has been just 30 dwellings per annum.
- 6.10. In order to increase housebuilding to these rates, it seems apparent that a number of additional sites will be required to ensure that the minimum number can be met during the Plan Period. Planning policy is clear that where undersupply has occurred, increasing the number of consents to make up for a shortfall is a good way of increasing delivery.

6.11. Taking the above into account, it is considered that the proposal does comprise sustainable development in the context of Paragraph 11, which is engaged through the lack of housing supply in Longridge (and arguably a lack of 5-year housing supply but also the Core Strategy being absent on self-build policies) and would not result in any adverse impacts in that respect. In particular, the site: -

- a) Is well located in relation to the strategic highway network;
- b) Is within walking distance of a range of services and facilities;
- c) Would make effective use of a site which stands adjacent to a residential area as illustrated on the Council's current planning policy proposal map and development currently being built out to the north;
- d) Currently has an unresolved objection to the proposed settlement boundary for Longridge within the forthcoming Local Plan examination;
- e) Clearly functions as part of the settlement of Longridge by virtue of the extant planning permission at the site, the existing land use to the south, the extant planning permission to the east and the new housing development to the north;
- f) Can be developed without harm to neighbouring land uses;
- g) Has good existing vehicular access that does not require mitigation measures;
- h) The development would avoid generating a significant visual, but rather would lead to an improvement on the landscape impacts when considering the massing and scale of the extant commercial planning permission at the site;
- i) Would provide self-build plots (a statutory legal duty the Council must provide for as per previous legal advice provided to the Council in Appendix B), in an area where demands for such plots exists and where the Council has so far failed to provide such plots.

6.12. As such, this proposal is considered to deliver a sustainable form of housing development as is required by the NPPF. The scale of development and its context in relation to its location is considered acceptable and whilst there would be some impacts it is not considered that there would be sufficient harm to significantly and demonstrably outweigh the many benefits. Furthermore, **Paragraph 77** states that planning policies and decisions should support housing developments in rural areas that reflect local

needs. **Paragraph 78** indicates that to promote sustainable development within rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Whilst, **Paragraph 61** states that:

"Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)."

- 6.13. It is as such clear that the requirements for Local Planning Authorities (as discussed below) to provide self-build plots is clearly set out within national planning policy.
- 6.14. **Paragraph 83** regarding 'Supporting a prosperous rural economy' outlines that planning policies should support economic growth in rural areas. It outlines that this can be done through the approval of well-designed new buildings.
- 6.15. Chapter 9 of the Framework, Promoting Sustainable Transport, at **Paragraph 109** states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The proposed access off Blackburn Road has clear visibility and the existing neighbouring access points haven been used safely over many years. Therefore, the transport impacts cannot be identified as severe.
- 6.16. Chapter 14 of the Framework considers climate change, flooding and coastal change. **Paragraph 155** states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. The site is located entirely within Flood Zone 1 and therefore it is not considered the proposal poses any additional risk to flooding in the local area. **Paragraph 163** states that when determining planning applications, Local Planning Authorities should ensure flood risk is not increased elsewhere.

- 6.17. This statement and supporting documents have demonstrated that this application is consistent with national policy, in that the development will not generate significant adverse impacts and should therefore be subsequently approved.

HED DPD

- 6.18. It is a requirement of the emerging DPD that it is able to meet in full the housing, employment and other identified needs of the Borough during the plan period. This needs to be achieved through its policies and particularly its land use allocations, including settlement boundaries. At this stage we believe that the approach taken by the Council is unsound, as it will not be effective in delivering the right amount of development. This is further supplemented by the under delivery of dwellings to meet the need of Longridge as discussed above.
- 6.19. In the case of residential development, which makes up the largest likely land use allocation, the Council appears to believe that meeting only the minimum housing requirements set out in the Core Strategy is a correct way to plan for the future development of the Borough. This is evidenced by the fact that the Council seeks only to identify those sites for which planning permission has been granted and which notionally would meet the minimum requirements, if all sites were developed entirely as planned. It is also clear from the fact that the Council is seeking new allocations in only a very small number of settlements, on the basis that these settlements still have a 'residual requirement', based on figures in the Core Strategy. Of course, it remains clear that the residual requirement is the shortfall in numbers to meet the minimum requirements, it is certainly not a ceiling. Core Strategy policy sets the housing requirement as a minimum in order to ensure that additional development over and above the minimum is encouraged and is a sensible way to ensure that minimum requirements are exceeded.
- 6.20. It is clear from past evidence that approved housing schemes will not always deliver any or all of the housing anticipated in the expected timeframe and that much can change over the lifetime of the plan. Unless all approved housing sites deliver precisely

as anticipated, it is clear that the policies of the DPD will fail to deliver the Core Strategy housing requirement. Having no alternative strategy in place, through additional or reserve allocations in the emerging DPD is therefore plainly inappropriate and would render the plan unsound in our opinion.

- 6.21. For this reason, it is considered that suitable sites within or on the periphery of all settlements should be considered for identification within the emerging HED DPD. We have therefore identified the aforementioned site subject of this planning application as part of an additional site within the HED DPD. In this respect the DPD is a material consideration, given the unresolved objection to the settlement boundary.
- 6.22. In this respect, regarding the Council's recently published housing supply position, the assertion that the housing delivery test has been complied with is fundamentally flawed. The test should consider the extent to which, within an authority, average annual completions taken over a three-year period, fell short of the annual housing requirement. It is PWA's view that, in this particular context, the annual housing requirement must be the adjusted requirement, taking into account any accumulated shortfall, rather than the unadjusted Core Strategy figure which disregards any backlog. Use of the unadjusted figure would give a false result, particularly if the actual completions do not match or exceed the adjusted figure, as this would result in a widening shortfall, which clearly cannot be the intention of the housing delivery test, which is intended to ensure that housing requirements are properly met.
- 6.23. In the case of Ribble Valley Borough Council (RVBC), its adjusted annual requirement (stated as "Annual Requirement" in its own HLAS tables) is in excess of the annual completions that have been identified and has been the case for a number of years. The adjusted 5-year requirement (before adding a buffer) is made up of planned annual requirement over 5 years + backlog figure. The backlog was at its maximum in 2013/2014 at 945 units. This is gradually reducing to the current backlog figure of 576 dwellings. However, it remains the case when using the adjusted 5-year requirement,

including a 5% buffer, the Council have in no given year achieved the necessary level of completions since the start of the plan period in 2008.

- 6.24. The NPPF refers the housing delivery test being based on the figures published in November 2018, however on the basis that no such figures have been released the annualised requirements set out by the Council remain those applicable in this instance. RVBC produced their annual position statement in April of every year, with an update after 6 months in September. Consequently, we are currently just over half way through the annual monitoring period inferring it would be most appropriate to look over the last 3.5 years of data. The below table compares the completed dwelling numbers against the relevant annualised requirement for that monitoring year.

HLAS Year	Completed Dwellings	Annualised Requirement with 5% buffer as shown in HLAS	Percentage of requirement delivered
April 15 – March 16	300	508	59%
April 16 – March 17	390	452	86%
April 17 – March 18	400	426	94%
April 18 – September 18	192	415 (207 for 6-month period)	93% (based on 6-month period)

- 6.25. When taking an average over the last 3.5 years the Council have only managed to meet 83% of their housing requirement. The NPPF states that in such situations where housing delivery is below 85% of the housing requirement there has been a significant under delivery and the 20% buffer is the appropriate buffer to be applied in any subsequent housing supply calculation. As a result, the Council's most recent position is not considered correct.
- 6.26. Operating on the basis the Council's future supply is sound, the introduction of a 20% buffer results in the Council's supply reducing to 5.4 years. It therefore becomes prudent to have regard to 'Special Planning and Development Committee' which the LPA held on the 17th of July 2018 (submitted as POST 2.25 in relation to the Housing and Economic Development DPD EIP which is discussed below). At this meeting the LPA acknowledged the frailties of their housing supply and the inferred that in order for

the Council to accommodate for further fluctuations in housing delivery *"the Council should ideally have a 5-year supply that falls within the range of 5.5 to 6 years"*. Clearly this would not be the case should the Council operate under a 20% buffer.

- 6.27. The Council commenced with their Examination in Public regarding the emerging Housing and Economic Development DPD on 26th of November 2018. The aforementioned housing supply statement was put forward as part of the supporting evidence to the DPD. Concern was raised regarding the inclusion of the revised housing calculations on the basis that insufficient time had been provided to assess its soundness and as to whether there was any justification for the inclusion of a 5% buffer. This has resulted in this portion of the examination, relating to housing and as such the soundness of the plan, being deferred until next year. Consequently, it remains a realistic outcome that the Council's housing supply is found unsound and given the fluctuating nature of said supply it's evident this new position can only be given limited weight until such a time it has been considered as part of the above-mentioned examination. Notwithstanding this, at this time it is considered enough evidence has been put forward to suggest the supply, if at all sound, is at best marginal.

Self-build and Custom Housebuilding Act 2015

- 6.28. This application seeks permission for up to 21 self-build dwellings. In this respect, there is a duty for Local Planning Authorities to plan for self-build developments as a recognised local housing need which in turn should feed into the Council's Strategic Housing Market Assessment.
- 6.29. The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) requires each relevant authority to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in the authority's area for their own self-build and custom housebuilding.
- 6.30. Local planning authorities should use this demand data from the registers in their area, supported as necessary by additional data from secondary sources when preparing their Strategic Housing Market Assessment to understand and consider future need for

this type of housing in their area (Planning Practice Guidance, Paragraph: 011 Reference ID: 57-011-20160401).

- 6.31. Relevant authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. The level of demand is established by reference to the number of entries added to an authority's register during a base period (Planning Practice Guidance, Paragraph: 023 Reference ID: 57-023-201760728).
- 6.32. Relevant authorities should consider how they can best support self-build and custom housebuilding in their area. This could include (as set out in Planning Practice Guidance, Paragraph: 025 Reference ID: 57-025-201760728):
- Developing policies in their Local Plan for self-build and custom housebuilding;
 - Using their own land if available and suitable for self-build and custom housebuilding and marketing it to those on the register;
 - **Engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and**
 - **Working with custom build developers to maximise opportunities for self-build and custom housebuilding.**
- 6.33. Further to guidance within the Planning Practice Guidance, the new NPPF provides further clear guidance that LPA's should provide for self-build demand, as set out within Paragraph 61 of the NPPF. It is clear that the Council's Development Plan is absent on self-build policies, and as set out, Paragraph 11 of the NPPF is engaged.

Summary

- 6.34. The proposed development would provide a valuable contribution towards the Borough's housing supply. The Council's housing land supply is considered to be marginal, however, as discussed within this statement, the provision of housing within Longridge is not considered to be meeting the demand and need set out within the Core Strategy, and furthermore, given the absence of self-build policies within the Core Strategy, in line with NPPF Paragraph 11, there should be a presumption in favour of sustainable development.
- 6.35. With regards to the principle of development, it is considered the proposed development is consistent with Policies DS1, H2, DMG2 and DMH3. The development represents a site that has a functional relationship with the Longridge settlement by virtue of its proximity, ease of access and its interaction with other development both within and outside the formal settlement boundary. It would also assist in consolidating and rounding-off of the built-up area, contributing to the housing supply within Longridge. The proposal constitutes a scheme far preferable to sporadic development in more rural areas or smaller settlements. Furthermore, it would also contribute to meeting local needs, and helping the Council to discharge its statutory duties under the Self-build and Custom Housebuilding Act 2015, through the provision of self-build dwellings, further demonstrating compliance with the requirements set by the aforementioned policies.
- 6.36. Self-build is a type of housing for which the local planning authority is statutorily obliged to make provision, as required by the Self-build and Custom Housebuilding Act (2015) (as amended by the Housing and Planning Act 2016). The two duties in the 2015 Act which are concerned with increasing the availability of land to meet the demand for self-build/custom-build housing are the 'duty to grant planning permission etc.' and the 'duty as regards registers'. The local planning authority must give suitable development permission for enough suitable serviced plots to meet the demand for self-build/custom-build in the area. The level of demand is established by reference to the number of

entries added to the authority's register during the base period¹. The current base period began on 31st October 2018 and runs until 30th October 2019.

- 6.37. At the end of each base period, relevant authorities have 3 years in which to grant permission for an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries for that base period. At the time of submission there is known to be at least 26 people registered on the self-build register who have expressed an interest in a self-build project within the Longridge area. However, at the time of this submission, no self-build schemes have been granted by the local planning authority. The local planning authority is therefore falling significantly behind its duty with regards to self-build and custom build housing. The proposed development would make a valuable contribution to this target, in which the Council have a duty to meet by 30th October 2019.
- 6.38. In terms of the weight to be afforded to the need for local planning authorities to grant permission for self-build and custom build housing, PWA Planning has taken counsel advice (see Appendix B). The view of Anthony Gill (Kings Chambers) in this respect is that the weight to be afforded is significant, verging on overwhelming.
- 6.39. In reaching this view, Mr Gill explains that a local planning authority has a statutory duty which the 2015 Act imposes into planning functions. In his opinion, this is a higher duty than for other forms of housing. The requirement to provide for other forms of housing is a prescription from national policy that local plans (which statute says should be followed) should provide for housing need of various kinds. Regarding self-build, he finds that the duty requires no such articulation – it is clear upon the face of the 2015 Act that there is a freestanding duty beyond the duty under s.38(6) to follow the development plan. S.38(6) requires the development plan be followed unless material considerations indicate otherwise. One such material consideration would be an Act of Parliament imposing a specific planning duty to provide planning permission for this

¹ The first base period begins on the day on which the register (which meets the requirement of the 2015 Act) is established and ends on 30 October 2016. Each subsequent base period is the period of 12 months beginning immediately after the end of the previous base period. Subsequent base periods will therefore run from 31 October to 30 October each year.

specialist form of housing. The weight for a material consideration is a matter for the decision maker, however Mr Gill's view is that these factors indicate that the weight of a duty imposed by a primary piece of legislation from Parliament must be significant, verging on overwhelming.

- 6.40. Finally, there are no technical considerations with regards to design, ecology or transportation which should warrant the refusal of this planning application. Therefore, in line with Paragraph 11 of the NPPF which states that where the development plan is out of date, 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 the Framework as a whole. Clearly, the benefits associated with the proposed development, including its contribution to housing delivery, would not be outweighed by any adverse impacts associated with the development. As such, planning permission should be approved without delay.

/7 CONCLUSIONS

- 7.1. PWA Planning is retained by Mr. Mark Hurst to prepare and submit an outline planning application for up to 21 self-build dwellings at land associated with Higher College Farm, Lower Road, Longridge PR3 2YY.
- 7.2. The proposals are considered consistent with relevant Development Plan policy, and should policy conflict be considered to exist, it has been demonstrated that it is confined to policies for the supply of housing, and lack of self-build policies, which are affected by the guidance set out in the NPPF and other material considerations set out by this statement. The impacts of the development are limited, and the benefits are significant, such that the balance is heavily in favour of the scheme, even before applying the weighting inherent in Paragraph 11 of NPPF. The development scheme is therefore considered to represent sustainable development.
- 7.3. The scheme is submitted with a suite of technical reports and other evidence which clearly demonstrate that there would be no significant adverse impacts resulting from the proposed development and hence no reason that planning permission ought not to be granted.
- 7.4. The works would result in a number of key benefits which are deemed relevant to the determination of the application, namely: -
- Delivery of up to 21 no. much needed new homes, assisting the Authority in meeting its objectively assessed needs;
 - The enhancement of local character and distinctiveness through the implementation of sensitive landscaping measures and design (and a consequently an enhancement on the extant planning permission arrangement);
 - Support for existing businesses and suppliers in the area during construction, contributing to the local economy;

- A significant contribution to local need housing through the provision of self-build plots, including affordable self-build;
- A significant contribution to meeting housing need within Longridge;
- Development which is capable of occurring without significant harm to any interests of acknowledged importance.

7.5. For the reasons identified within this statement, it is considered that detailed planning permission for the development should be granted and the application is commended to the authority.

APPENDIX A

TRANSPORT STATEMENT

Transport Statement

PROPOSED BUSINESS PARK AND CHANGE OF USE
OF EXISTING BUILDINGS TO B1 USE

AT HIGHER COLLEGE FARM,
LONGRIDGE,
PR3 2YY

REF: - 5296

Version 1.01 Rev A – 26.06.17

23rd June 2017

Introduction

This Transport Statement has been prepared to support the outline planning application submitted, for a proposed business park and change of use of the existing buildings to B1 use, at Higher College Farm, Longridge.

Land use proposals

The proposal involves the creation of B1, B2 and B8 starter units and the change of use of the existing buildings to B1 use, the outline application is for all matters reserved except access, so the car parking provisions and site layouts indicated are illustrative only. The Transport Statement will set out how accessibility to the site will be improved and how adequate provision will be made for access to the site and parking provision onsite.

Existing site description

The site is situated to the east of Longridge, the site is bounded to the north by the B6243 Blackburn Road. To the northern side of Blackburn Road opposite the site a residential development is under construction. To the east and west of the site is agricultural land, however there is currently a planning application being determined on the adjacent agricultural land to the east.

Immediately to the south of Higher College Farm is a single storey commercial unit, this commercial unit is accessed via a track to the east of the site. The site is currently used for agricultural purposes and has an area of 1.5 hectares.

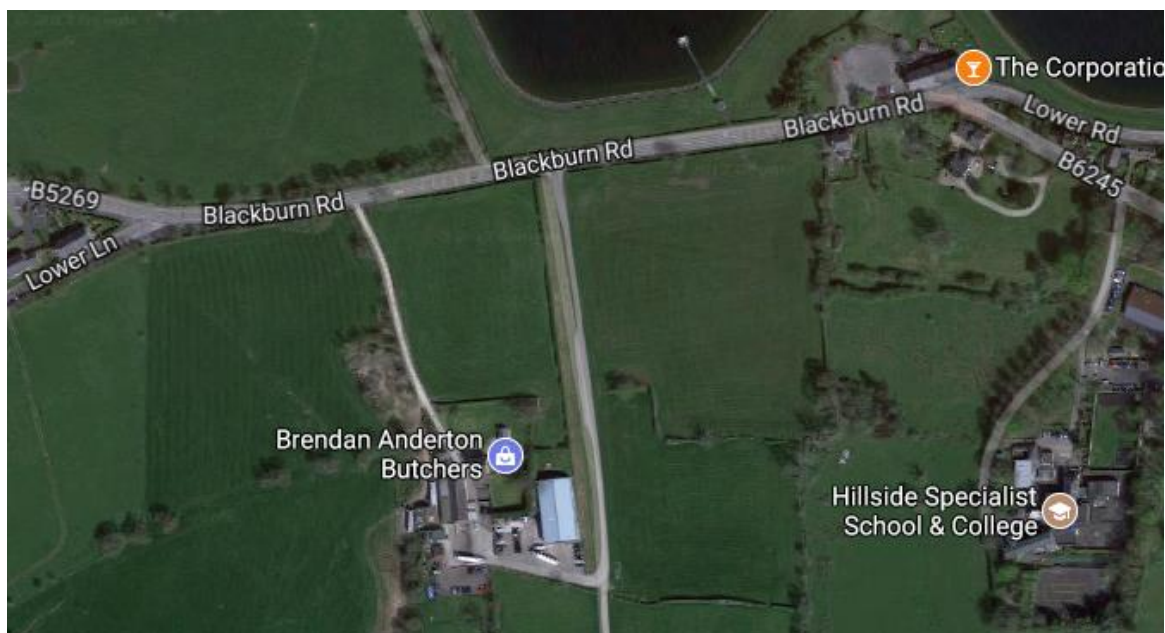


Image showing the site location immediately to the north of Brendan Anderton Butchers.

Roads

The site is served via the B6243 from Longridge, to the east the road leads to Clitheroe and to the west to Preston. The road links Longridge to the M6 towards the west and the A59 towards the east. Where the new site entrance is proposed the B6243 is a single carriageway road, approximately 7.4m wide.

Where the B6243 forms the northern boundary to the site to the west, a 30mph speed limit is in place and to the east a 60mph speed restriction. Given the position of the 30mph speed limit sign and the rumble strips to reduce the speed of the oncoming traffic to the east of the sign, the traffic speed on this section of road is likely to be considerably less than the speed limit. The rumble strips extend across the width of the road and extend along two thirds of the sites road frontage.

To the north of the road is a pavement that runs from Longridge towards the east, to the south of the road is a wide verge and hedge to the site boundary. Blackburn road is a bus route and designated cycle route.

Bus Stops

Currently the closest bus stop to the site is approximately 250m to the east near the Corporation Arms. Two public buses stop here, the no 5 which runs from Chipping to Clitheroe, Monday – Saturday approximately every 2 hours and the no 35 which runs from Chipping to Blackburn, Monday – Saturday approximately every 2 hours.

The Tootle Green residential development currently under construction to the north of the site is going to provide a new bus stop, this will be located approximately 140m to the west of the site.

Pedestrian Access

The pavement running to the northern side of the B6243 provides pedestrian access into Longridge. The proposals include for the provision of a pedestrian refuge to the west of the site entrance which will help link the site to the existing pedestrian route, from the pedestrian refuge pavements will be provided within the site to access the buildings.

Cycle Routes

The site is easily accessible by cycling, as the B6243 is part of the Lancashire Cycleway. Consequently, some of the car trips generated could be replaced by cycling.

Accident Data

Accident data available online at collisionmap.uk indicates that in the past 5 years there have been no accidents on the road immediately to the north of the site. To the east of the site at the Corporation Arms/ Lower Road junction 2 serious accidents and 4 slight accidents have occurred in the past 5 years.

Site proposals

The illustrative site layout shows 8 buildings with a total floor area of 2592m². These buildings are split into 18 units which are 72m² and 9 units which are 144m². These proposed starter units will generate limited traffic which will be small in nature.

In total the new buildings will provide 1080m² of B1 accommodation and 1512m² of B2/ B8 accommodation. It is proposed that the use of the existing buildings will be changed to B1 accommodation.

It is proposed that the new site entrance will be via a T junction onto the B6243. At this junction 2.4m x 120m visibility splays can be provided to the nearside of the carriageway, within the applicants' ownership and whilst retaining the existing hedge where the site fronts Blackburn Road. This will ensure there are no safety concerns regarding the suitability of the new junction.

It should be noted that given the 30mph speed limit sign is only 20m to the west of the proposed site entrance, the speed of the traffic at the site entrance will be considerably lower than the 60mph speed limit on the road.

As mentioned earlier, a pedestrian refuge will be introduced to the west of the site entrance to link the site to the existing pedestrian route to the north of the B6243. From here pedestrians will be able to access Longridge, the new bus stop at Tootle Green and the existing Corporation Arms bus stops. Footpaths within the site will provide access to the proposed units.

The introduction of a pedestrian refuge will also prevent the opportunity to overtake at this point, and therefore remove the potential for overtaking to lead to an accident at the proposed junction.

The site is easily accessible to cyclists as the B6243 is part of the Lancashire Cycleway. Covered bike stands will be provided within the site to encourage site users to cycle to work.

As shown on the illustrative site plan adequate turning areas have been provided within the site to suit the smaller vehicles the proposed starter units will generate.

Car parking provisions

Following the Joint Lancashire Structure Plan Parking Standards accessibility criteria, the site falls into the low accessibility category and Longridge is a level 4 centre for the purposes of access and parking.

This Parking Standard sets the minimum car parking provision to be provided based on the use class per m² of floor area. Use class B1 is to provide 1 parking space per 30m², B2 is to provide 1 space per 45m² and B8 is to provide 1 space per 200m². The parking provided onsite exceeds this minimum requirements, providing 1 space per 30m² to the proposed new units.

Car parking provision for the existing buildings is 1 space per 35m². Consequently, parking provision provided will easily meet the demand generated onsite.

Anticipated traffic generation

Following the model of other sites within the Ribble Valley where small starter units exist, the anticipated traffic movements generated is considered to be small.

Assuming all 27 units are let, it should be assumed that the smaller units will be visited by 2 vehicles per day (and depart), the larger units will be visited by 4 vehicles per day (and depart).

The type of buildings / units are not the model to attract many visitors or large deliveries. If each unit is visited by its owners (2/4 No) per day depending on the size of the unit and maximum deliveries are based on 1 per week to each unit, the frequency of movements will be spread throughout the days / weeks.

It is estimated that 78 vehicle movements will be made onto and off the site per day.

The type of vehicle to be accessing the site will be 50% small/medium vans, i.e. 39 with the rest being cars.

Conclusion

Following consideration of the above, it is clear that although the proposals will create additional traffic, the proposal will not lead to highways issues on the local road network. The site access provides sufficient visibility to ensure manoeuvrability to and from the site can be undertaken safely, the smaller vehicles anticipated will not lead to additional pressure on the local road network and there is adequate car

parking provision provided onsite to serve the proposed floor area that will be created.

Consequently, the proposals will not create any highway safety issues.



www.pwaplanning.co.uk

2 Lockside Office Park
Lockside Road
Preston
PR2 2YS

01772 369 669
info@pwaplanning.co.uk
www.pwaplanning.co.uk