

Technical Note

Project:	Pendle Mill Pendle Road Clitheroe BB7 1JQ Ribbles Valley Borough Council Planning Application Reference 3/2022/0632	Project No:	300828-003-01
Subject:	Response to Lancashire CC Highway Authority Planning Application Comments		
Prepared by:	Ian Ladbrooke	Date:	12.08.2022
Checked by:	Karen Smith	Date:	12.08.2022

Ribbles Valley Borough Council Planning Application no: 3/2022/0632, Pendle Mill Pendle Road Clitheroe BB7 1JQ for the Demolition of existing buildings and erection of a care home (Use Class C2) of up to 70 beds. All matters reserved apart from access.

Response to Lancashire County Council (LCC) as Local Highway Authority (LHA) planning application consultation comments contained at **Appendix A**. The response follows the sequence of comments from LCC for ease of reference.

Introduction

It is noted the LCC acknowledge that the site is currently occupied by three existing operational developments.

Site Access

A site section is included at **Appendix B** which demonstrates a 1:20 gradient at the new site access location for the first 5m behind the highway boundary.

It is noted that any change to the retaining wall feature located at the back of the existing footway fronting Pendle Road, will need to be conditioned by the LHA.

The street lighting column is shown on the revised site access drawing at **Appendix C**. The lighting column is not affected by the proposed access arrangements, but would be located in the middle of the improved footway and therefore its position may need adjusting.

Increasing the access radii from 4m to 6m will not materially improve the spacing between vehicles entering and exiting the site simultaneously. To increase separation, the revised site access drawing at **Appendix C** shows the access widened from 5.5m to 6.0m. The tracking demonstrates that vehicles can access and egress simultaneously with greater tolerance.

As requested, tactile paving can be provided on the proposed 2m wide footway which will be provided to the right of the access across from number 21 Pendle Road. This will align with the tactile paving provided on the existing footway adjacent to the dwelling.

Servicing

LCC acknowledge that servicing currently occurs on-street to serve the furniture company.

Section 70(2) of the Town and Country Planning Act states that, in dealing with applications the Authority shall have regard to the provision of the development plan and other material considerations. In the general note on this section in the Encyclopaedia of Planning Law, and in relation to material considerations, reference is made to the planning history of the site stating that “an existing planning permission may be a material consideration in determining an application”. The sub-paragraph goes on to say; “The planning authority are entitled, and indeed obliged; to have regard to the ‘fall-back’ position, i.e. what the applicant could do without any fresh planning permission”

It is therefore clear that the Authority must pay full and detailed regard to the existing lawful use, including making an allowance of the traffic that would be generated by the legitimate use and an acceptance of the access arrangements by which they were served.

Section 6.4 of the Transport Assessment is concerned with the former use of the site. Paragraph 6.4.4 identifies the number of Heavy Goods Vehicles associated with the existing uses on the site with 30 arrivals and 30 departures daily. Assuming that these trips are evenly split between the three businesses on the site, the furniture company would have 10 large service deliveries per day potentially servicing from the kerbside on Pendle Road. Section 3.4 of the Transport Assessment identifies that there isn't a recent road safety problem with the local highway network in the vicinity of the site. This includes the existing kerbside servicing associated with the current use and it is noted that LHA have no pre-existing highway safety concerns.

The proposals seek to have kerbside refuse collection and servicing using the same servicing arrangements currently enjoyed by the furniture company. Other than refuse collection, service vehicles associated with the development are most likely to comprise light goods vehicles such as vans. Paragraph 6.3.4 of the Transport Assessment identifies that the care home would generate one service delivery every two days. This is considerably less than the existing situation and therefore the proposals would see a reduction in on street servicing when compared to existing conditions, which is a material consideration. Section 4.4 of the Transport Assessment demonstrates that large service deliveries can be accommodated on street (as is the existing situation) without adversely affecting the safe and free flow of traffic on Pendle Road. Therefore, there is no reason why service vehicles for the development would need to enter the site.

Other material; considerations are:

- The development proposals would remove servicing arrangements associated with the other businesses on the site which currently require large service vehicles to reverse to/from Pendle Road. The development will therefore have overall highway safety benefits relating to servicing.
- On site servicing for the development would require service vehicles to use the same access and internal circulation space that staff and visitors use for car parking. This is not desirable.

Highway Safety

It is noted that the LHA have no pre-existing highway safety concerns.

Trip Generation

It is noted that the LHA consider that the proposed development would not have a severe impact on the operation of the local road network.

Internal Layout

The development proposes a total of 28 car parking spaces. The LHA state that 37 car parking spaces are required. Detailed justification for the level of car parking associated with the development is set out at Section 4.3 of the Transport Assessment. The residents of the care home will not require car parking spaces

as the nature of their condition would preclude them from driving. Car parking standards are set out in the 'Joint Lancashire Structure Plan' March 2005. For C2 Residential Institutions the parking standard for all development car parking (staff and visitors) is based on the number of residents with 1 space per 5 residents. Therefore 70 residents would require 14 spaces for staff and visitors. The Transport Assessment recognises that the anticipated staff contingent of this development requires further consideration for additional staff car parking. A further 15 spaces are proposed for staff which would be adequate for the number of staff on site at any one time. This is a significantly greater level of parking provision than set out within parking standards and reflects the operational requirements of the development without an over provision.

Staffing will operate over three shifts to provide 24 hour care. This means that there will be three staff change overs per day. Visitors are likely to be limited to certain times of the day and encouraged to avoid peak operational times such as changeover periods where there will be some disruption to daily activities. Therefore it is likely that staff will have use of all car parking on site for the short duration at shift changeovers and with an adequate number of spaces provided on site for such situations.

It is noted that the LHA deem the site to be in a sustainable location and to encourage the use of sustainable travel and reduce the reliance on the private car (and therefore car parking), the LHA acknowledge that the application has provided a Travel Plan which the LHA welcome. Therefore, staff and visitors will have opportunities to use sustainable travel which will reduce the need to provide additional car parking at the site above the operational levels identified.

Providing additional car parking on site above the levels proposed is therefore not required.

Sustainable Transport

It is noted that the LHA deem the site to be in a sustainable location and acknowledge that the development will operate a Travel Plan.

APPENDIX A

Lancashire County Council Highway Authority Planning Application Consultation Response

Ribble Valley Borough Council
Housing & Development Control

Tel 0300 123 6780
Email developeras@lancashire.gov.uk

Your ref 3/2022/0632
Our ref D3.2022.0632
Date 29th July 2022

FAO Kathryn Hughes

Dear Sir/Madam

Application no: **3/2022/0632**

Address: **Pendle Mill Pendle Road Clitheroe BB7 1JQ**

Proposal: **Demolition of existing buildings and erection of a care home (Use Class C2) of up to 70 beds. All matters reserved apart from access.**

The Local Highway Authority have viewed the plans and highway related documents and have the following comments to make:

Summary

Further Information

Lancashire County Council acting as the Local Highway Authority does not consider that the application as submitted fully assesses the highway impact of the proposed development and further information is required as set out in this response. Without this information the Local Highway Authority is unable to provide final highway advice on this application.

Advice to Local Planning Authority

Introduction

The Local Highway Authority (LHA) are in receipt of an outline application with all matters reserved apart from access for the demolition of existing buildings and the erection of a care home for up to 70 beds at Pendle Mill, Pendle Road, Clitheroe.

The LHA are aware that the site is currently occupied by three individual units, which are listed below. All the rest of the buildings on the site are currently unoccupied.

- Worthington- This is a furniture showroom. Use Class E.

Phil Durnell

Director of highways and Transport
Lancashire County Council
PO Box 100 • County Hall • Preston • PR1 0LD
www.lancashire.gov.uk

- RE Dawson- Occupy the mill buildings to the rear of the furniture showroom. The floor space is used for warehousing for a mail order business. Use Class B8
- JPA Sports – School wear mail order business with some ancillary on-site retail. Use Class B8.

Site Access

The LHA are aware that the site currently has two vehicular accesses which are both accessed off Pendle Road, which is a C classified road subject to a 30mph speed limit.

The accesses are used to serve the occupied units, with the furniture showroom company Worthington being accessed from the dropped kerb crossing along Pendle Road, while JPA Sports and RE Dawson are accessed at the western end of the site adjacent to number 21 Pendle Road below the retaining wall fronting the footway and carriageway serving Pendle Road.

Following the proposal, as shown on Sanderson drawing number 300828-001 titled "Proposed Access Arrangement and Visibility Splays," these accesses will be stopped up and a new access will serve the site.

Before reviewing the technical details of the proposed access, the LHA are aware by visiting the site and by reviewing Google Streetview that there is a level difference at the proposed site access between the highway and the internal road network. To ensure that the difference is not greater than 1 in 20 for the first 5m behind the highway boundary, the LHA will require a site section drawing showing the change in levels at the site access is submitted. The LHA also inform the Agent and Applicant that any change to the retaining wall feature located at the back of the existing footway fronting Pendle Road, will need to be conditioned by the LHA. The LHA will require a technical drawing showing the new retaining wall. This is to ensure that any change in the retaining wall feature will not destabilise the adopted highway.

Furthermore, the LHA are aware that the proposed access may conflict with the existing streetlight on Pendle Road. To ensure that the access does not conflict with the streetlight, the LHA require a revised drawing showing the location of the streetlight. The LHA inform the Applicant and Agent that should the access conflict, the Applicant will be liable to relocating the streetlight elsewhere.

In any case, the LHA have reviewed the new access arrangements, as shown on Sanderson drawing number 300828-001 titled "Proposed Access Arrangement and Visibility Splays" and are aware that the access will be 5.5m wide with a 4m junction radii. To support the creation of the access, a tracking drawing has been submitted showing two normal sized vehicles entering and exiting the site simultaneously.

The LHA have reviewed the tracking drawing and are aware that the bodies of the vehicles are quite close together when two-way movements are occurring at the access due to the curve of the internal road. To ensure that no collisions occur at the

access when two-way movements are occurring, the LHA will require the junction radii to be a minimum of 6m. This should be shown on a revised drawing. To further ensure the junction radii is adequate a revised tracking drawing of two vehicles should also be submitted.

Furthermore, to ensure the width of the access is adequate the LHA will require a tracking drawing of a refuse vehicle entering and exiting the site access is submitted. The LHA will require this because the LHA are unable to accept a servicing area for the site to be provided on-street along Pendle Road. This is because, while its likely servicing currently occurs on-street to serve the furniture company, a more formalised area internally is required for the care home. The formalised area can then be used by emergency vehicles and minibuses as well.

The LHA advise that, even though this will be addressed during the reserved matters stage, a turning head will be required internally to ensure that refuse and emergency vehicles can exit the site in a forward gear. The LHA will also require a swept path drawing is submitted during the reserved matters stage showing the usability of the turning head for refuse and emergency vehicles.

Before then and for the LHA to get a better understanding of the type of servicing vehicles which will service the site, details should be submitted as part of this application regarding the expected size of delivery vehicles to the proposed care home. Details should be submitted in a short statement.

The LHA have further reviewed Sanderson drawing number 300828-001 titled "Proposed Access Arrangement and Visibility Splays," and are aware that the site can provide visibility splays of 2.4m x 43m in both directions. The LHA are aware that this complies with the LHAs guidance for a 30mph road.

However, and again this can be addressed during the reserved matters stage, but the LHA advise that the parking space located in the visibility splay to the left of the access is realigned so that it is line with the first 4 spaces. This is because currently should a vehicle be parked in this space it will obstruct the accesses visibility.

It is worth noting that the LHA welcome the proposed tactile paving which will be provided at the site access, as shown on the drawing. However, the LHA will request that tactile paving is provided on the proposed 2m wide footway which will be provided to the right of the access across from number 21 Pendle Road. This is to align with the tactile paving provided on the existing footway adjacent to the dwelling.

The LHA also inform the Agent and Applicant that any existing accesses which will not serve the proposal will need to be stopped up with full height kerbs and any unused dropped kerbs will also need to be reinstated to full height at the expense of the Applicant, following a Section 278 agreement.

Highway Safety

There have been no Personal Injury Collisions recorded within 200m of the site and therefore the LHA have no pre-existing highway safety concerns.

Trip Generation

The Applicant has submitted a TRICS assessment, which can be viewed in the Sanderson Transport assessment. A TRICS assessment demonstrates the approximate level of trips the proposed development as a whole could generate.

In the Transport Statement, the Consultant has compared the existing and proposed use at the site. For transparency, the LHA have done the same with the tables replicated below.

It is worth noting that the LHA, alike the Transport Consultant, has categorised the use of the existing site to be all storage even though there is some retail element to the existing use. This is because information has not been submitted splitting the internal floor area of both uses. Therefore, the predicted existing trips to the site will be less than the actual trips generated, given the general rule that a retail use will generate more trips than a storage use.

In any case, the existing predicted trips for the existing site is shown below:

Land Use: Storage (3221sqm)	Weekday AM Peak (0800-0900)			Weekday PM Peak (1700-1800)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Trip rate per 100sqm	0.307	0.140	0.447	0.108	0.313	0.421
Total Trip Generation	9.9	4.5	14.4	3.5	10	13.5

Table 1: Predicted existing trips to the site.

Land Use: Care Home- Specific Condition (70 resides)	Weekday AM Peak (0800-0900)			Weekday PM Peak (1700-1800)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Trip rate per 1 resides	0.081	0.017	0.098	0.029	0.069	0.098
Total Trip Generation	5.7	1.2	6.9	2	4.8	6.9

Table 2: Predicted proposed trips to the site.

Alike the Transport Consultant for the proposed use, the LHA have used the category "Care Home- Specific Condition" rather than "Care Home- Elderly Residential" with the former generating more trips.

In any case, as shown in the tables above, it is considered that the proposed use would generate lower levels of traffic than the existing use, with there being 28 expected existing two-way trips during peak hours and 14 for the proposed. This is even though, as explained above, that the existing site is likely to generate more trips

given the retail element to the site. Therefore, as a result, it is considered that the proposed development would not have a severe impact on the operation of the local road network.

Internal Layout

The LHA are aware that the application is an outline application with all matters reserved except access and so the internal layout can be addressed at the reserved matters stage.

However, the LHA will advise the Agent and Applicant what the LHA require for the internal layout to be acceptable, since some internal layout details have been shown on Sanderson drawing number 300828-001 titled "Proposed Access Arrangement and Visibility Splays," such as parking and the internal road network.

In any case, the LHA have reviewed Sanderson drawing number 300828-001 titled "Proposed Access Arrangement and Visibility Splays," and are aware that the site will provide 28 car parking spaces for the site, including two disabled bays and 3 Electric Vehicle charging points.

However, given that 23 staff members will be on site at any one time and 14 spaces are required for the residents, the LHA require 37 spaces to be provided. Therefore, there is a shortfall of 9 spaces.

The LHA are requesting further car parking spaces are provided to ensure that there is adequate parking spaces during shift changes and there is a minimum of one space per member of staff on site at any one time. More capacity is required to ensure that there is adequate number of parking spaces during visiting times for the residents. This is so that inappropriate parking does not occur on the highway.

Furthermore, as discussed in the site access section, the LHA require an internal servicing area to be provided for refuse, service and emergency vehicles. This is because the LHA are unable to accept the proposed servicing area which is located on-street along Pendle Road, as shown on Sanderson drawing number 300828-002 titled "Proposed Servicing Arrangements."

To complement an internal servicing area, which should be shown on a revised plan, a turning head should be provided ensuring that large vehicles can exit the site in a forward gear. The suitability of the turning head and the internal carriageway should be supported by a swept path analysis drawing showing a refuse vehicle entering and exiting the site in a forward gear.

Sustainable Transport

The LHA are aware that the site is well served by public transport such as buses with there being a bus stop on either side of Pendle Road close to the site's frontage. The bus services serve mainly hourly services to the centre of Clitheroe, Blackburn and Burnley. However, the LHA do note that the bus services are limited during evenings and Sundays.

The LHA are also aware that the site is located approximately 500m from the centre Clitheroe where local amenities such as supermarkets, doctor surgeries and shops are found. Visitors and staff members can take advantage of further public transport services which are located at the Clitheroe Bus Interchange and Clitheroe Train Station which serve hourly services to Blackburn and Manchester.

In response to the site being well served by public transport and the site being within walking distance of Clitheroe town centre, the LHA deem the site to be in a sustainable location. To encourage the use of these services and reduce the reliance on the private car, the LHA are aware that the application has provided a Travel Plan provided by Sanderson which the LHA welcome.

The LHA also note to the north of the site that there is a Public Footpath with the path reference 3-1-FP10. The LHA will comment further on the Public Footpath during the re-consultation.

Conclusion

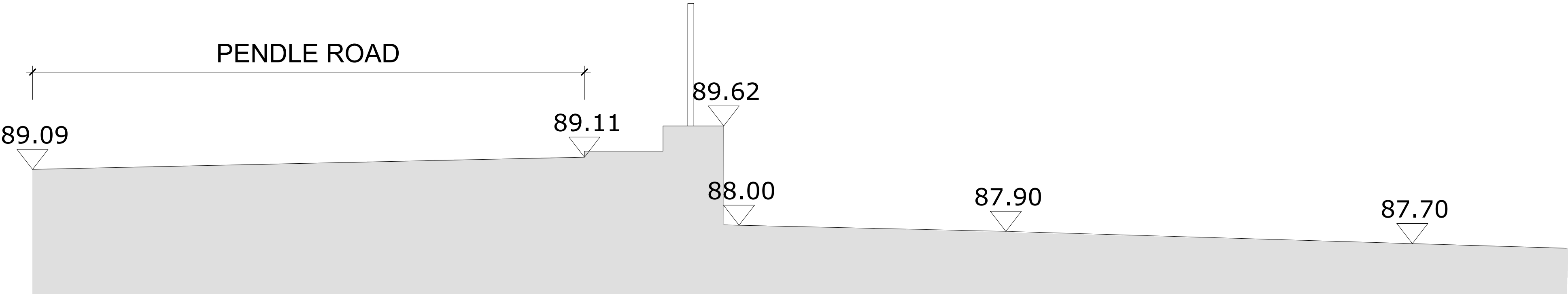
The LHA require further information before the LHA can fully assess the application.

Yours faithfully

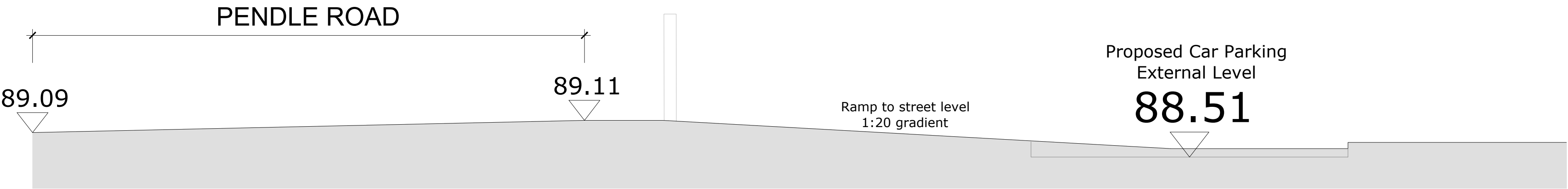
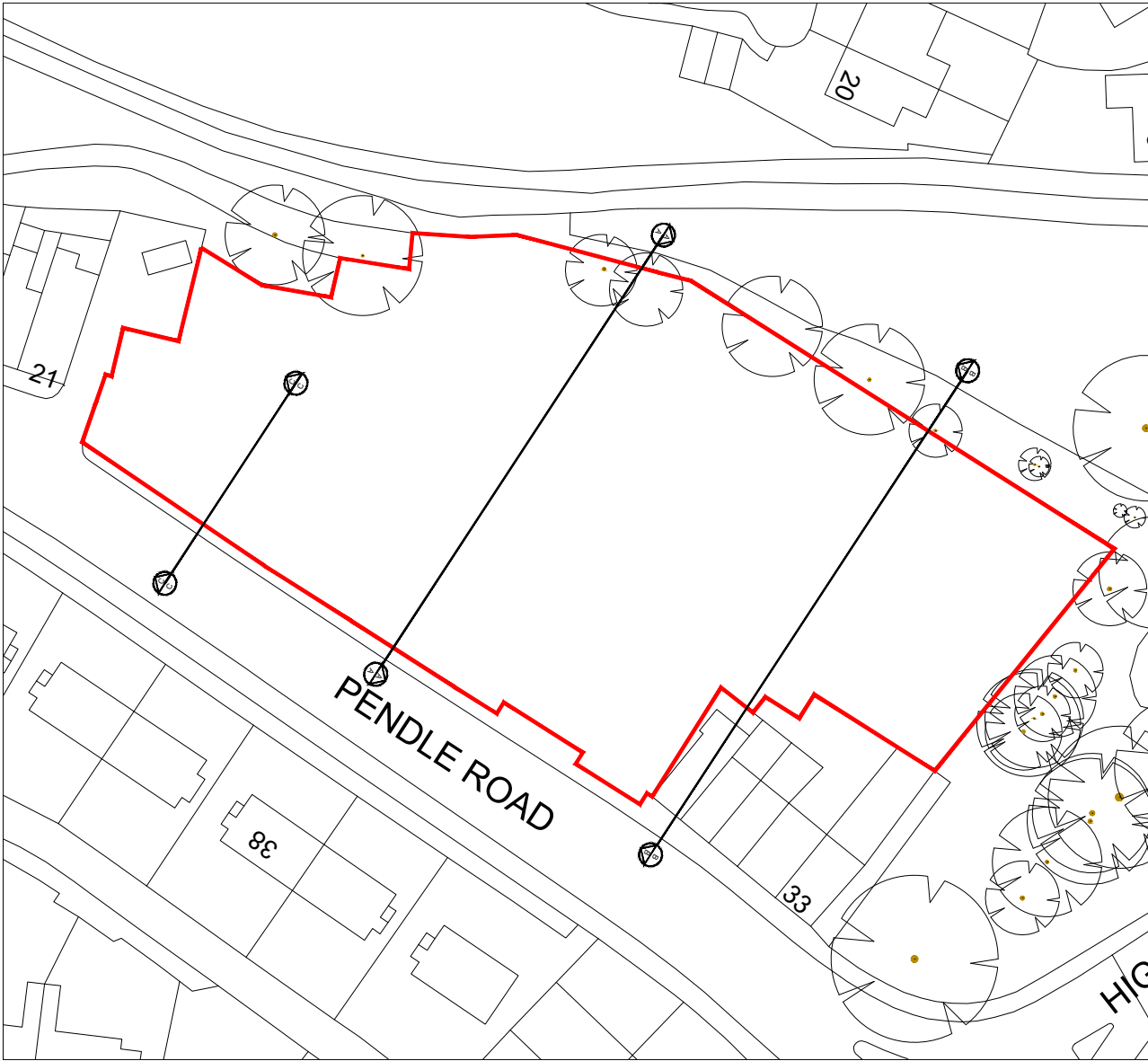
Ryan Derbyshire
Assistant Engineer
Highway Development Control
Highways and Transport
Lancashire County Council

APPENDIX B

Site Access Section Plan



Existing Site Section C-C



Proposed Site Section C-C

FOR ILLUSTRATIVE PURPOSES ONLY

MÜLLER

-	08/08/22	Original Drawing	CM	JB
Rev	Date	Revision Description	Drawn By	Approved By

ADG

ARCHITECTS

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Client

Muller Property Group

Project Information

Proposed 70 Bed Care Home, Pendle Road, Clitheroe

Drawing Title

Existing and Proposed Site Section C-C

A1 Scale	1:50	A3 Scale	1:100		
Job Number	H.21.78	Drawing Number	(9-) 22	Revision	~

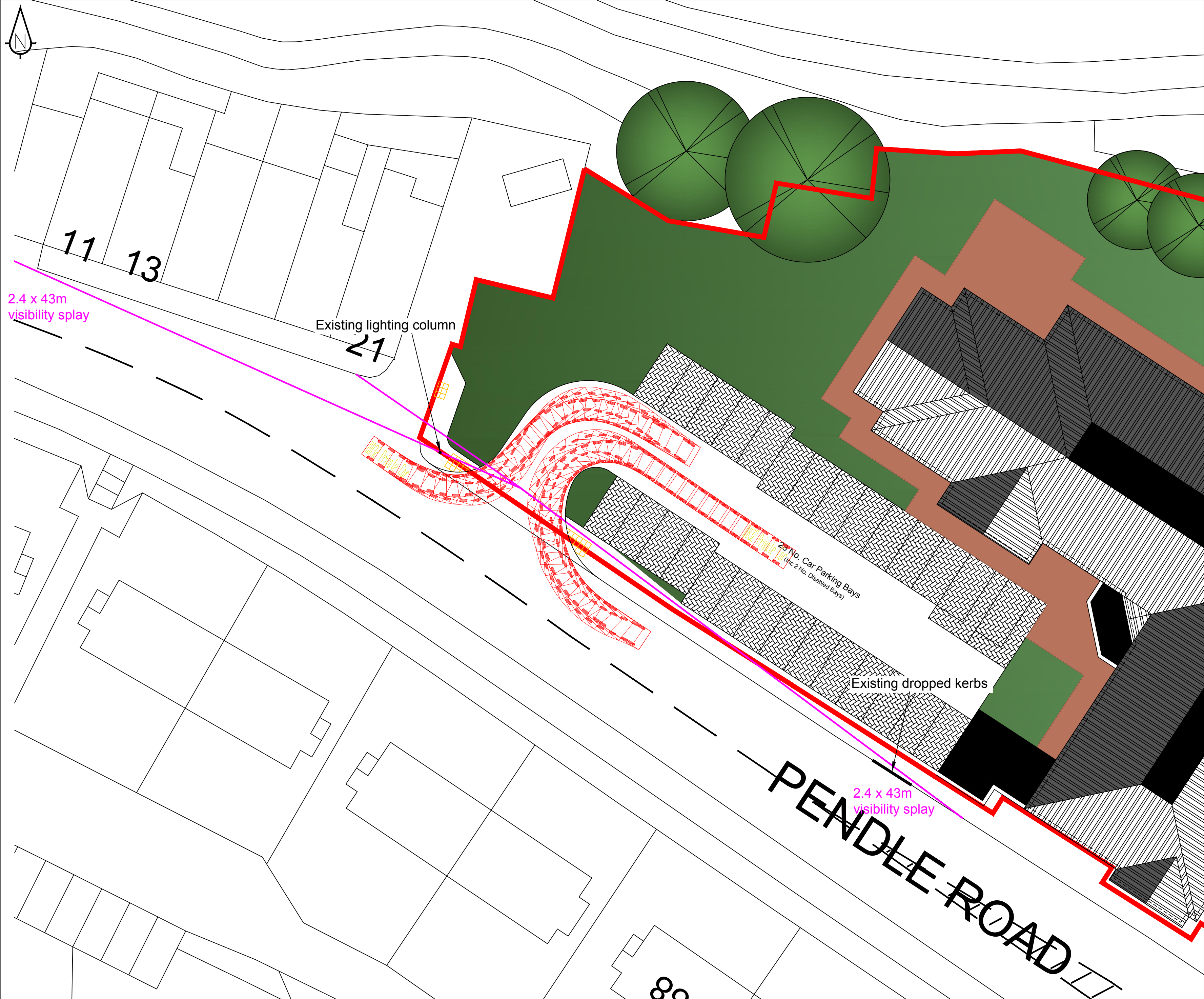
Drawing Issue

PLANNING

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APPENDIX C

Amended Site Access Plan

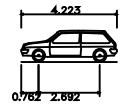


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DB32 Private Car
Overall Length 4.223m
Overall Width 1.715m
Overall Body Height 1.592m
Min Body Ground Clearance 0.255m
Max Track Width 1.629m
Look to Lock Time 4.00s
Kerb to Kerb Turning Radius 5.780m

A	Site layout and access amended	AA	11.08.22	IEL
Rev	Amendment	Drawn	Date	Checked

Sa

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Project Title
Pendle Mill, Pendle Road, Clitheroe

Drawing Title
Proposed Access Arrangement
and Visibility Splays

Scale 1:200	Drawn By AA
Drawing Size A2	Checked By IEL
Date 17.05.2022	Approved By IEL
Drawing Number 300828-001	Rev A