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Your ref: 3/2024/0802
Our ref: 3/2024/0802/HDC/KW
Date: 07 November 2024

Location: Central Garage Warwick Street Longridge PR3 3EB
Proposal: Proposed industrial unit 59.5m sq behind existing industrial unit of 169m sq.
Grid Ref: 360216 437487

Dear Maya Cullen

With regard to your consultation letter dated 31 October 2024, I have the following comments to make based on all the information provided by the applicant to date.

Summary

The Local Highway Authority advice is that the residual cumulative impacts of the development are severe in accordance with the National Planning Policy Framework (2023) and the Local Planning Authority is advised to consider refusal on transport/highway grounds for the reasons outlined in this report.

Advice to Local Planning Authority

Introduction

The Local Highway Authority advises the following reason for refusal:

1. The proposal, if permitted, would likely lead to inappropriate servicing for the two commercial units occurring on-street. This would be to the detriment of highway safety and the residual cumulative impacts on the road network would be severe. This is contrary to Paragraph 115 of the National Planning Policy Framework (2023).

The Local Highway Authority (LHA) are in receipt of an application for the proposed industrial unit 59.5msq behind existing industrial unit of 169msq at Central Garage, Warwick Street, Longridge.

Currently, an existing industrial unit is used by APS Signs and Print operates within the site. The application is for an additional commercial unit behind the existing unit. The LHA are aware of a similar planning application for the site application reference 3/2023/0573, which was withdrawn.

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Site Access

The LHA are aware that the site is located off Warwick Street, an unclassified road subject to a 20mph speed limit.

The LHA has reviewed the proposed site plan drawing number 1538/02 Revision A, and is aware that the site will utilise an amended access which also serves the existing commercial unit. The removal of the gates and a section of wall will increase the width of the access to 6.7m wide.

Whilst the plans do not show a second access the applicant has provided further information which states *'APS is also accessed by a full-sized vehicular access shutter door, with a width of 5m and a dropped kerb, this is also used for loading/unloading of stock. This door is clearly signed to be kept free for 24hr access, and once the H Bar in front of the shutter has been installed, will be utilised by APS and the new unit for deliveries.'*

The Local Highway Authority has received a request for a H Bar road marking across the existing access to Central Garage. A H Bar is an advisory road marking used to indicate that a section of the road should be kept clear of parked vehicles to allow access to off-road parking areas. While H Bar markings are not legally enforceable, they serve as a helpful reminder for drivers and are often requested when inconsiderate or obstructive parking takes place. They are often used near schools, shops, and other facilities that attract a lot of traffic.

Highway safety

There has been one recorded Personal Injury Collision within 100m of the application site in the last five years.

There is also evidence of a longstanding parking problem on Warwick Street, the Local Highway Authority have received 7 separate requests for parking restrictions and control measures in the last 4 years. There are some parking control measures, such as junction protections at the junction with Derby Road and H Bar markings to protect accesses on Warwick Street which indicates to the Local Highway Authority that inconsiderate and obstructive parking is a common occurrence.

On site observation found that the majority of Warwick Street only supports one way movement due to the on street parking which takes place on both sides of the entire road with sections of H Bar markings protecting accesses and providing informal passing places due to the restricted width of the carriageway. On site observations also noted junction parking at the junction of Towneley Road.

Parking

The applicant has now clarified the internal measurements and use class of the existing unit. The LHA apologises for the miscommunication regarding the parking requirements detailed in our previous response. The calculations were taken from the measurements of the existing business provided within the submitted plans however the applicant has

advised that these were the external measurements. The existing business operates under a use class B2 and has an internal floor area of 169SqM. Therefore, the existing unit requires 4 off-street parking spaces to be in line with the Joint Lancashire Structure Plan.

Whilst taking the internal floor area into consideration, the LHA only requires 1 car parking space to be provided for the proposed unit to comply with the LHAs parking guidance. The LHA has reviewed the amended drawing number 240901/01 and noted the site has a total of 5 off-street parking spaces, which is acceptable for the size and use class of both units.

Servicing and Deliveries

The applicant has now provided details of the vehicles which serve the existing business unit, Advance Print Solutions which are *'DPD, Fed-Ex etc, who use large vans. Vans use the on-site car park or use the existing delivery point established for Central Garage when delivering'* and *'Deliveries for the new unit will be by van either from the car park or from the existing delivery point (used successfully by the existing business).'*

The LHA are of the opinion that whilst drawing 240901/01 shows a lights goods vehicle accessing the site, turning within and exiting the site in a forward gear, the LHA do have concerns over the practicality of such vehicles turning in practice given the limited space available.

The applicant has stated that deliveries also take place in large vans therefore it is the LHAs opinion that this is represented in the Swept Path of Medium Goods Vehicles Turning shown within drawing 240901/01. The applicant has also provided further clarification on the manoeuvring of such vehicles in order to serve the site *'drawing 240901/01 shows a medium goods vehicle reversing into the site and exiting the site in a forward gear'*. Vehicle turning within the site for a medium goods vehicle is not possible, the drawing also does not represent the true street scene. To undertake such a manoeuvre would require that no vehicle parking takes place adjacent to the access and opposite. A site visit and Google Street View shows that this is not the case on Warwick Street. Whilst the applicant has very recently applied for a H Bar, a recent site visit and Google Street View history indicate that the H Bar markings already present on Warwick Street are not fully self-enforcing and overhang parking does take place. This also does not take into account parking on the opposite side of Warwick Street. As can be seen from drawing 240901/01 even with a H Bar marking, the vehicle turning would still cross over sections which cannot be protected.

The LHA would also like to add that the reversing of a medium goods vehicle from the live carriageway is not a manoeuvre we would deem safe, particularly in a town centre location with significant on-street parking. This is because such vehicles often have significant blind spots, making it difficult for the driver to see pedestrians, other vehicles, or obstacles behind them, there's a high risk of colliding with objects, buildings, or other vehicles, which can cause damage and potentially injure people, pedestrians may not notice the reversing van, especially if they are distracted or if the van doesn't have adequate warning signals and reversing in tight spaces increases the likelihood of accidents due to restricted manoeuvrability.



The applicant has also now advised that they use an additional access *'APS is also accessed by a full-sized vehicular access shutter door, with a width of 5m and a dropped kerb, this is also used for loading/unloading of stock. This door is clearly signed to be kept free for 24hr access, and once the H Bar in front of the shutter has been installed, will be utilised by APS and the new unit for deliveries'*. The concerns as stated above also apply to the use of the shutter, the LHA would not support reversing on Warwick Street, not only is it an unsafe manoeuvre in a town centre location but there are also concerns around its feasibility being that it is controlled by private signage and the possibility of a H Bar marking in the future, both of which have no legal backing, at this location the LHA also have concerns about the self enforcing nature of such measures as an on-site visit and historical Google Street View shows that advisory parking controls are ignored.

The applicant also advises that *'the existing unit is partially serviced from the car park, the existing roadside space on Warwick Street and from Warwick Street itself (as is every other business on the street). The new unit will be serviced from the existing roadside space and the on-site car park only.'* This information confirms that servicing within the site is limited, most likely due to a lack of manoeuvring space. The LHA would therefore not support a new unit being served from the roadside. It should be noted that there is no Loading Bays present on Warwick Street so any servicing that is already taking place on Warwick Street is happening at the kerb side when space is available or from the live carriageway. As there is an existing servicing requirement for the existing businesses and a high demand for on-street parking, further adding to this would likely result in serious highway safety concerns given that there is very limited space to undertake such deliveries the likelihood of servicing within the carriageway, obstructing the flow of traffic, is very high. As a result of the potential conflicts, allowing further servicing will be to the detriment of highway safety and contrary to Paragraph 114 of the National Planning Policy Framework (2023).

Although the applicant has suggested that the proposed unit will be used as an extension to their existing business, the LHA have concerns that the unit could be used or sold separately in the future resulting in two commercial businesses operating from the site. Unfortunately, due to future enforcement concerns and the application as presented, the Local Planning Authority would not support a condition which would ensure that only the existing business operates from the site. At this time the LHA would be unable to support any new businesses operating from the site, given the requirements of the existing commercial activities already causing some highway safety concerns on Warwick Street, it would be remiss of the Local Highway Authority to add to this.

The applicant has stated no servicing occurs from the area where the proposed development would take place and *'It is a roughly gravelled area that we allow a neighbouring business to store scrap metal and an old vehicle on it and the local council to use for their materials for Longridge in Bloom'*. The LHA are of the opinion that this space could provide adequate space to provide a servicing area which could serve the existing site. Given the safety concerns servicing from the carriageway presents the LHA are of the opinion that this area should be kept clear so serving can take place in this way. However following the proposal, there is limited space for servicing vehicles to turn around and exit the site in a forward gear as this area will be removed. This would then result in the possibility of two businesses being served from the carriageway or inappropriate and challenging manoeuvres taking place within the carriageway into the site resulting in highway safety concerns.



The LHA are unable to accept any additional servicing from Warwick Street to serve the site. This is because not only does this conflict with the National Planning Policy Framework which requires new development to provide access for servicing vehicles but there is limited space for this to occur on Warwick Street. Vehicles park on-street because the street is home to a number of existing retail and industrial units as well as a number of dwellings. These units and dwellings do not have access to any off-street parking facilities.

Following there being limited space at the side of the carriageway, servicing vehicles could instead wait in the middle of the carriageway. This would be unacceptable and would be to the detriment of highway safety and contrary to the National Planning Policy Framework (2023). This is because it would impact upon the free flow of Warwick Street.

Conclusion

The LHA object to the application due to there being no practical servicing facilities provided for the two units internally at the site. The LHA are concerned that should the application be permitted, it would be to the detriment of highway safety and in turn contrary to paragraphs 114 and 115 of the National Planning Policy Framework (2023).

Informative

This report sets out why the Highway Authority advises the Local Planning Authority should be refused planning permission. However, should the Local Planning Authority be minded to grant planning permission, please notify the Highway Authority so that advice can be provided on appropriate conditions and contributions to minimise the impact of the development.

Yours sincerely

Kate Walsh

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