

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 The LHA are aware of a similar planning application for the site application reference 3/2023/0573, which was withdrawn.

This implies that we are not able to service our current business (APS) from Warwick Street. We have been in business on Warwick Street for 13 years, and are one of the oldest business on the Street. Central Garage was built in the 1910's and has always been a garage with HGV's and Medium Goods Vehicles servicing it until we bought the premises. The whole area is BMG1 Industrial.

Site Access Para 1

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.

Just for clarity, Warwick Street and the area that Central Garage resides in, is in the centre of DMB1, this has been an industrial estate since The Old Corn mill and Central Garage were built before 1910. The area is still classed as an industrial area – this includes the land which auction court is built on. In fact the area of Auction Court, which backs onto our property, originally had planning passed for 9 industrial units in 2013 (3/2013/0145). Please see images below



Site Access Para 2

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.'

Our main business is sign writing and wrapping commercial vehicles, LWB Vans, Tractors, Horse Boxes, HGV's and Arctic Tractor units. We do this inside our building from the "second access" which is via shutter door and we drive vehicles into the building, we don't have issues getting vehicle in or out of our unit. There isn't room to turn them around inside so they either have to reverse in or out.



Site Access Para 3

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.

We are fully aware that H Bars are not legally enforceable. Our primary reason for requesting one is that we do have occasional issues with vehicles parking in front of our shutters and blocking our customers' vehicles in, please see image below. (we have many such photos if you would like me to send you them)

LHA stated on planning application 3/2022/0622 for a bar off Berry Lane that the LHA recommended be served from Warwick Street. "The LHA have no objection" to the applicant in this case using a H Bar as a Loading Bay "While larger deliveries, which will be limited, will use the existing delivery point established for Vertigo Solutions". We can only assume by "the existing delivery point" the LHA are referring to the H Bar in front of the shutter door, which for application 3/2022/0622 was acceptable to the LHA!

Highway safety Para 1

Highway safety

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

From memory this incident occurred on Derby Rd, someone walked into the main road. The location on Mario is in the wrong position. Does this mean any accident in the surrounding areas within 100m of our site has been caused by a vehicle parked on Warwick Street?

Highway safety Para 2

There is also evidence of a long-standing 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.

Out of the 7 requests most have been from myself, there should be parking restrictions on Warwick Street. I have put forward to LCC, our parish council and RVBC that there should be parking permits and the parking warden should "do the rounds" on Warwick Street. This would alleviate a lot of the current issues, I would say this is a failing on the part of LCC.

There needs to be Junction Protections at the Townley Road end of Warwick Street, again this is something I have informed LCC of. If the Traffic Warden did do his rounds onto Warwick Street the obstructive parking wouldn't be a problem. Please see image below.



Highway safety Para 3

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.

I would argue that another H Bar would add an extra passing point. The Parking on the corner of Townley Road and Warwick Street is an issue (I have mentioned this previously), LHA need to address this separately and I don't see why our application should be affected by LHA's failure to control the parking on Warwick St.

Lets also not forget the plans to make the bottom end of Berry Lane into a One Way Street, which will also make Warwick Street One Way.

Parking Para 1

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.

This statement is incorrect, There was no “miscommunication” LHA incorrectly worked out the number of parking spaces from a number that we can't find on our plans, we are quite bemused how LHA got this so wrong when our application is literally called “*Proposed B2 industrial unit 59.5m sq behind existing industrial unit of 169m sq.*”

Parking Para 2

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.

So from this LHA are happy with the number of parking spaces to support the old and new units.

Servicing and Deliveries Para 1

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).'

Servicing and Deliveries Para 2

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.

This is done daily, this is how I park, I agree that the Vehicle turning plan is slightly incorrect as it states a 4 point turn, we do this in 3, and can supply a drone video to show if you wish.

Servicing and Deliveries Para 3

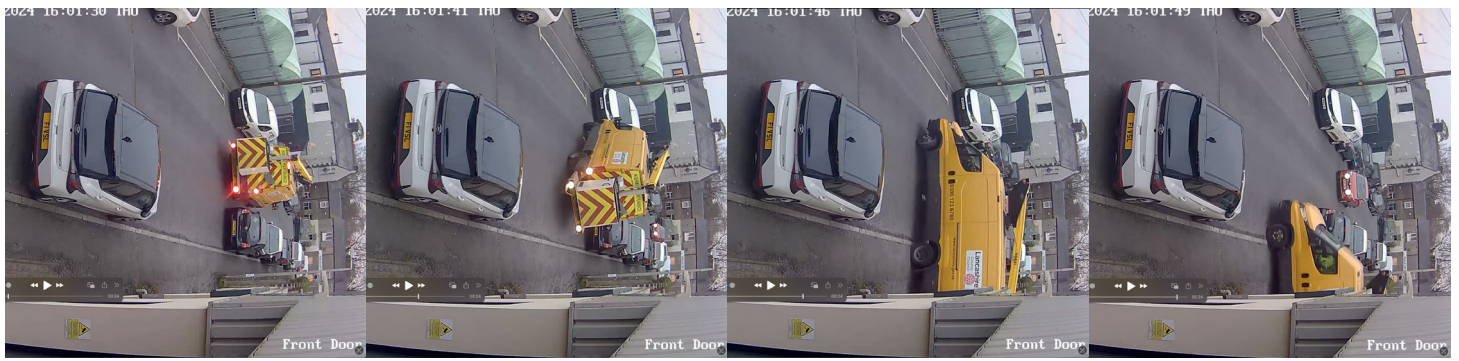
The applicant has stated that deliveries also take place in large vans therefore it is the LHAs opinion that this is represented in the Swept Path of Medium Goods Vehicles Turning shown within drawing 240901/01. The applicant has also provided further clarification on the manoeuvring of such vehicles 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.

With regards to LWB vans (Parcel Force, DPD ect) here is a list of vans which used our yard from Mon to Thurs 4th-7th Nov for servicing the other businesses and residents on Warwick Street, I know this as they always come into my office asking for directions. We did not have any deliveries to our existing business this week.

4x Parcel force, 7x DPD, 6x Yodel, 5x EVri, 3x FedEx, 14x Amazon (mostly for Auction Court) and 1x LCC IVECO Daily 5.5Ton MEWP (collecting festive lights for Longridge Town Council)

They all reverse into our yard safely with zero issues. I would love to see what would happen if we closed the gates to our carpark for good, all the above vehicles would have to service the other businesses from the live carriageway.

Video of the LCC MEWP making these manoeuvres attached to this email, And Pictures on the next page. Please note that vehicles are double parked and are parked right up to our gated entrance.



Servicing and Deliveries Para 4

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.

Please see reply to **Servicing and Deliveries Para 3**

Servicing and Deliveries Para 5

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.

Please see our reply to **Site Access Para 3**

Servicing and Deliveries Para 6

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).

Every other business on Warwick street is serviced either from the kerbside or on the live carriageway, we are the only business with space for servicing, our reply to **Servicing and Deliveries Para 3** explains this. We allow the other businesses to use our yard for there deliveries again I would love to see what would happen if we closed our gates to the yard for good.

Servicing and Deliveries Para 6

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.

No we didn't, We didn't suggest the unit being an extension to our existing business, we are not sure where you got this information from.

Servicing and Deliveries Para 7

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.

None of these, wagons or vans use the area you recommend as a turning area. And this area has never been used for servicing or turning, They just reverse into the carpark. Also the area you would like us to keep clear is now waiting to have a BMG assessment and as such can't be driven on or cleared. If our planning isn't passed the area would forever be an unusable area.

When I spoke to the LCC driver that reversed into our yard on the 7th Nov and asked him why he reversed in, he said that on his training for the long lift vehicle he drives he was taught to reverse into places just like our yard as it's safer to do so due to having much more control and a tighter turning circle. He also expressed how he could easily turn the MEWP round in our yard if needed.

The proposed build site isn't visible from the roadside and natural instinct is to reverse in.

Servicing and Deliveries Para 8

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.

This happens to every single business on Warwick Street.

The LCC driver in the MEWD reversed into the yard and drove out while Warwick Street was at capacity without any issues, this isn't a one of occurrence it happens multiple times a day as stated in our reply to **Servicing and Deliveries Para 3**

Vertigo Solutions who started a new business "The Stagedoor" in the Old Corn Mill Warwick Street (planning application number 3/2022/0622) is the only business that doesn't have ANY off road parking on Warwick Street yet the LHA stated "While the LHA would require 10 parking spaces to comply with the LHAs parking guidance as defined in the Joint Lancashire Structure Plan, the LHA will accept the shortfall." "while staff members, entertainers, contractors and deliveries will use the Warwick Street access."

We feel this is comparable to our planning as they started a whole new business, which is being serviced from Warwick Street but without a large Car Park to service it.

Servicing and Deliveries Para 9

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.

As all ready stated, our car park is more than adequate. This already happens and will not be any better without the new unit and wont be any worse with the new unit

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

Servicing has been happening to all the businesses on Warwick Street for longer than any of us have been alive, we are incredibly generous with our site letting other businesses and nearby residents use it for deliveries and servicing.

The cynic in me is quite sure that LHA will respond that if we build on the site and use our car parking spaces then there wont be any servicing available for any business on Warwick Street and as such LHA object to our planning!

I work on the site of APS on my own and we only have 1-2 deliveries a month we have demonstrated that servicing is possible not just for our business but for the surrounding ones for many years.

Is it an option to have a Loading bay in stead of a H Bar?

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.