

STATEMENT OF CASE - APPENDICES

HALLAM LAND MANAGEMENT LIMITED

LAND SOUTH OF LONGSIGHT ROAD, LANGHO

DECEMBER 2025

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Appendices

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APPENDIX 1:

TECHNICAL STATEMENT - HOUSING LAND SUPPLY MATTERS

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Executive Summary

This Statement has been prepared on behalf of Hallam Land Management Limited (hereafter “the Appellant”) to provide planning evidence in respect of an appeal pursuant to Section 78 of the Town and Country Planning Act 1990 against Ribble Valley Borough Council’s (hereafter “the Council”) decision to refuse planning permission for residential development under the following outline planning application:

- Land South of Longsight Road, Langho – (Ref: 3/2025/0196).

This Statement specifically addresses matters relating to housing land supply.

The essential questions for determining the housing land supply for RVBC are (i) should the Council be allowed to reduce their housing requirement through offsetting an ‘oversupply’ of housing delivered over the Plan period; and (ii) determining the extent of the Council’s deliverable housing supply.

Issue 1 – Should an allowance of ‘oversupply’ be accepted?

Against the historical backdrop of the Key Statement H1 housing requirement, and recent planning policy reforms, this Statement considers the appropriateness of the Council’s proposition for allowing ‘oversupply’.

Reference is made to ‘oversupply’ for purposes of consistency with the Council, however this approach is in short only an exceedance in housing delivery against a minimum annualised average housing requirement of 280 dwellings per annum (dpa).

NPPF Paragraph 78 provides a starting point which in itself wholly undermines the Council’s methodology. In the context of Paragraph 78, the NPPF provides a binary choice between the application of housing requirements set by adopted strategic policies (i.e. Key Statement H1) or LHN. In this case the Council is inviting the Inspector to consider a third option which is not permitted under a strict interpretation of national policy.

Should this point not be accepted, for completeness this Statement provides a detailed analysis of the relevant factors specific to Ribble Valley and arrive at a planning judgement which has been reinforced by an assessment of national policy, guidance and relevant decision-making.

The express lack of policy guidance to support this approach is considered as being fundamental to its appropriateness. This represents a conscious omission from Government who are not seeking to endorse the application of minimum housing requirements as a ceiling. Had this been the case then PPG could have been amended following the NPPF 2024 consultation and given that it is a 'live document'.

The Council is inviting the Inspector to accept a proposition that will intentionally suppress their future housing requirement through an entirely new policy approach that is not endorsed within the NPPF or PPG.

This proposition is wholly contrary to the national imperative of significantly boosting the supply of housing as is reinforced under the NPPF, PPG and White Papers on Housing and Planning. This is the conclusion of several Inspectors and the Secretary of State in determining relevant decisions grappling with this matter. Such decisions are material considerations of significant weight because there should be consistency in decision-making.

The Council's proposition is to significantly reduce their housing requirement to just 65% of the LHN figure. This runs contrary to what the planning system is seeking to achieve in terms of significantly boosting the supply of housing land.

If it is accepted that any exceedance above a minimum housing requirement can be 'banked', then this will mean Council's will only ever continue to deliver the minimum amount of housing. This does not align with the Development Plan, NPPF and has been supported by several appeal decisions. There is no evidential basis for Ribble Valley to be an exception.

It is also important to note the clear distinction between supply and delivery. To rely on historic delivery to suppress an established current need figure for an immediate future period will go no way to meeting the evidenced requirement for housing with a defined area.

The implications for accepting oversupply will only exacerbate the existing shortfall in affordable and market housing within the Borough and fall well short of meeting identified needs. This results in a tension between housing delivery and delivering other strategic objectives through the Plan when taken as a whole (i.e. Strategic Objective 2 and the requirement to meet all housing needs) and further undermines the Council's case on allowing for 'oversupply'.

It is determined that the 5YHLS should not be calculated on the basis of a reduction in the annualised requirement, as a result of past exceedances against an out of date, housing requirement in Key Statement H1.

Issue 2 – Ribble Valley's deliverable supply of housing land

The Council's deliverable supply evidence, as presented in the RVBC 5 Year Housing Land Supply (5YHLS) Statement 2025, has been reviewed and considered against relevant case law and the NPPF definition of 'deliverable'. It is concluded that the deliverable supply over the next five years is 1,017 dwellings.

Having assessed the supply it is concluded that 307 dwellings should be removed, principally because of the Council's uncertainty over the deliverability and lead-in periods of Site allocation HAL 5 (Highmoor Farm, Standen), and assumptions on small windfall sites. While RVBC claim a supply of 1,324 dwellings, our assessment which has been undertaken on a fair and conservative basis shows this position to be 1,017 dwellings. This position will continue to be reviewed through the duration of the appeal upon final submission of evidence. Matters of difference in the deliverable supply position will also be the subject of ongoing common ground discussions.

A summary breakdown in the deliverable supply is set out below in Table 1:

Table 1: Summary on Deliverable Supply Positions

Deliverable Supply (2025-30)	Appellant's Position	RVBC's Position	Difference
C2 Permissions	76	76	0
Allocation Sites	107	177	-70
Full Planning Sites	82	85	-3
Outline Planning sites¹	0	41	-41
Under Construction & Commenced	596	730	-134
Small Sites	156	215	-60
Deliverable Supply	1017	1324	-307

¹ Note that the above addresses a point of consistency in the RVBC Supply Statement 2025 which includes Site Allocation HAL 5 - Highmoor Farm as an outline commitment. This has now been included in the Allocation Sites.

The quantitative difference in supply evidence is immaterial to any overriding conclusion on the matter of 5YHLS should the Inspector accept the Appellant's case that an allowance of oversupply cannot be applied to the LHN (Local Housing Need) requirement.

The deliverable supply position has consistently diminished over the last five years and has reduced to such an extent that there are now identifiable issues over the qualitative composition of this supply to meet the Borough's housing needs which includes affordable housing and older persons housing.

Conclusions on Ribble Valley's Five Year Housing Land Supply

This Statement concludes that the five-year housing land supply should be measured against the LHN figure, and a 5% buffer on the basis that Key Statement H1 is evidently out of date. The Council's proposition to 'bank' an oversupply of housing against what is a minimum strategic housing requirement, up to and even beyond the Plan period, is flawed and contrary to national policy and the imperative of significantly boosting the supply of housing.

This conclusion is consistent with that of several appeal decisions and the most recent determination from the Secretary of State.

A balanced consideration has been given to the merits and implications for making an allowance on oversupply, as a means of suppressing future housing requirements in Section 4, taking into account various appeal decisions, case law, and the wider context for housing delivery in Ribble Valley to inform our planning judgement. It is determined that such an approach is wholly contrary to an interpretation of both national and local policy, is at odds with the national imperative of the planning system to significantly boost the supply of housing and would further undermine the delivery of market, affordable and older persons housing in Ribble Valley.

It is only in a single, limited scenario where oversupply is allowed to be deducted from the forward LHN housing requirement, and an acceptance of the Council's deliverable supply, where RVBC can demonstrate a five-year housing land supply. Even then it is an incredibly marginal position at just 5.1 years (an exceedance of only 29 dwellings).

Based on a planning judgement on both issues, this Statement has assessed the supply and concluded that against the local housing need figure and a 5% buffer, the five-year housing land supply position equates to 3.1 years.

A summary of this calculation is set out below in Table 2:

Table 2: Summary on NJL Assessment of RVBC 5YHLS Position

	Housing Requirement	
A	RVBC Local Housing Need	311
B	Local Housing Need for 1st April 2021 to 31st March 2026	1,555
	Including Buffer	
C	5% Buffer based on Housing Delivery Performance [B*0.05]	78
D	Total Housing Requirement for 1st April 2021 to 31st March 2026 [B+C]	1,633
E	<u>Annual Housing Requirement [D / 5]</u>	<u>327</u>
	Housing Supply	
F	C2 Permissions	76
G	Site Allocations	107
H	Large sites with Full Permission (not yet commenced)	82
I	Large sites with Outline Permission	0
J	Large sites under construction/ commenced	596
K	Small sites windfall allowance	156
L	<u>Total Deliverable Supply</u>	<u>1,017</u>
M	Housing Land Supply Shortfall	-616
N	5YHLS Position (years)	3.1

In summarising the above components, it is concluded that should the Inspector find the proposed approach to offsetting 'oversupply' within the 5YHLS calculation is unjustified, then the Council are unable to demonstrate a 5YHLS irrespective of differences over the deliverable supply. If the Appellant's assessment on the deliverable supply is accepted, then the Council are unable to demonstrate a 5YHLS with or without 'oversupply' being factored into the calculation.

1.0 Introduction

1.1 This Statement has been prepared on behalf of Hallam Land Management Limited (hereafter “the Appellant”) to provide planning evidence in respect of an appeal pursuant to Section 78 of the Town and Country Planning Act 1990 against Ribble Valley Borough Council’s (hereafter “the Council”) decision to refuse planning permission for residential development under the following outline planning application:

- Land South of Longsight Road, Langho – (Ref: 3/2025/0196).

1.2 The proposed description of development was as follows:

‘Outline Application: Development residential homes (Use Class C3), associated access, rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access to, but not within, the site)’

1.3 This Statement specifically addresses matters relating to housing land supply and is to be read in conjunction with the Statement of Case prepared by NJL Consulting on all planning matters.

Approach to 5YHLS Evidence

1.4 The Appellant will seek to engage with the Local Planning Authority (LPA) through common ground discussions to narrow as far as possible the issues in dispute. Based on the presentation of evidence within the Council’s latest 5YHLS Statement (2025) and Committee Report, there are various matters which can be agreed between both parties which will be formalised within a separate Housing Supply Statement of Common Ground (SOCG).

1.5 However, in summary the matters which are in dispute presently relate to:

1. Appropriateness of factoring in oversupply into the 5YHLS calculation; and
2. Delivery rates in relation to specific sites within the identified supply.

2.0 Planning Policy Context

- 2.1 This section outlines relevant policy and guidance, which (taken as a whole) provides the basis for the Appellant's analysis on the housing land supply position in Ribble Valley.
- 2.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires applications for planning permission to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 2.3 In this case the National Planning Policy Framework ("NPPF") and Planning Practice Guidance ("PPG") is a material consideration. This includes reference to the National Planning Policy Framework and relevant extracts in the Planning Practice Guidance, covering the calculation of 5YHLS, deliverable supply, establishing the housing requirement for Ribble Valley and approach to any offsetting of oversupply.

Development Plan

- 2.4 The adopted Development Plan comprises of the:
- Core Strategy 2008-2028 (adopted 2014); and
 - Housing and Economic Development Plan (adopted 2019).
- 2.5 Key Statement H1: Housing Provision of the Core Strategy identifies that land for residential development will be made available to deliver 5,600 dwellings, estimated at an average annual completion target of at least 280 dwellings per year over the period 2008-2029 in accordance with baseline information.
- 2.6 The Council will identify through the relevant "Strategic Housing Land Availability Study" (SHLAA), sites for residential development that are deliverable over a five-year period. By reference to the housing land monitoring report and where appropriate Strategic Housing Land Availability Assessments, the Council will endeavour to ensure housing land is identified for the full 15 year Plan period and beyond. A 'plan-monitor-manage' approach will be adopted and a monitoring report will be the key tool in tracking the five year rolling land supply. The overall housing requirement will be subject to a formal review within five years from the date of adoption of the Core Strategy to ensure it remains the appropriate strategic figure with which to plan.
- 2.7 This Statement draws upon information within the Council's published 5 Year Supply Statements in order to fully understand the extent of housing delivery and provision within the local authority through the Plan period.

National Planning Policy Framework 2024

- 2.8 The National Planning Policy Framework was revised in December 2024. It sets out the Government's planning policies for England and how these should be applied. For decision taking, the revised Framework applies from the date of publication and as such, the policies within it are a material consideration of significant weight. Paragraph 61 sets out the Government's clear objective of significantly boosting the supply of housing land, emphasising the importance of ensuring *'that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay'*.
- 2.9 Paragraph 63 is an important consideration to this appeal and in coming to an overall judgement on the appropriateness of allowing for 'oversupply' in the five-year supply calculation, noting the circumstances facing this particular authority. The policy emphasis in Paragraph 63 makes clear the requirement upon Local Planning Authorities to ensure that appropriate housing land is available to meet the needs of 'different groups in the community' including (but not limited to):
- '[...] those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes'*
- 2.10 In determining the housing requirement and minimum number of homes needed, Paragraph 62 makes clear the requirement for plans to be informed by a local housing need assessment and/or conducted using the standard methodology for calculating local housing need. This represents a material shift in policy from the previous iteration of the NPPF (2023) which had watered down the application of the Standard Method as only an 'advisory starting-point' for establishing a housing requirement for the area.
- 2.11 Importantly, there are no longer provisions within the Framework which would otherwise permit 'exceptional circumstances' to justify an alternative approach to establishing housing needs. justify a departure from this which are to be resolved and demonstrated through the local plan making process.
- 2.12 Paragraph 72 adds that once the housing requirement has been set, local planning authorities need to clearly identify a deliverable supply of land to meet these needs, taking *'taking into account their availability, suitability and likely economic viability'*.

- 2.13 Set in the context of the core objective to significantly boost housing delivery, Paragraph 78 sets out the requirement for local planning authorities to demonstrate 'a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing' (NJL Emphasis).
- 2.14 This is to be set '*against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old*'. Footnote 39 of NPPF adds under Paragraph 78 that unless the housing requirement set out in the strategic policy has been '*reviewed and found not to require updating*', local housing need will be used for assessing whether a five year supply of specific deliverable sites exists using the standard method set out in the PPG once the strategic policy is more than five years old.
- 2.15 In respect of the application of the buffer, the paragraph continues in setting out that:
- 'The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*
- a) 5% to ensure choice and competition in the market for land; or*
 - b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
 - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply'*
- 2.16 Annex 2 (p. 72) of the 2024 NPPF sets out for the avoidance of doubt, the definition of 'deliverable' in the context of establishing a deliverable supply of housing land. The definition states:
- Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

2.17 Examples of the type of evidence which could be provided are listed in the PPG.

Planning Practice Guidance

2.18 The Planning Practice Guidance² on 'Housing Supply and Delivery' sets out the methodology for calculating a 5YHLS position.

2.19 As a starting point concerning the matter of offsetting oversupply from future housing requirements, the PPG³ only provides guidance on how to deal with over-supply in the context of offsetting '*any shortfalls against requirements from previous years*'. The PPG is silent on whether the same approach can be undertaken to offset against future housing requirements in the plan period.

2.20 It should be noted that the use of an "oversupply" reduction has been the subject of High Court litigation and a number of Appeal Decisions (see Section 4 of this Statement). It is an issue which is well-known to the Secretary of State (as the SoS has previously been a party to such proceedings and subsequent consultation in the 2024 NPPF). The PPG is a "living document", which can be updated to address new issues. The fact that the SoS has chosen not to change either the NPPF (in the December 2024 iteration) and/or the PPG suggests that the SoS does not consider that an allowance for past oversupply should be used to reduce the 5YHLS requirement. This would be consistent with the national policy imperative to boost significantly the supply of housing.

2.21 In establishing what housing requirement figure authorities should use when calculating their 5-year housing land supply, Paragraph 68-005 states:

'Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year land supply figure where:

- the plan was adopted in the last 5 years, or*
- the strategic housing policies have been reviewed within the last 5 years and found not to need updating. In other circumstances the 5 year housing land*

² Planning Practice Guidance: Housing supply and delivery

³ Planning Practice Guidance: Housing supply and delivery (Paragraph: 023 Reference ID: 68-032-20190722)

supply will be measured against the area's local housing need calculated using the standard method.

In other circumstances the 5 year housing land supply will be measured against the area's local housing need calculated using the standard method'.

2.22 In calculating the deliverable supply to be set against the housing requirement, the Planning Practice Guidance⁴ builds upon the definition of 'deliverable' under Annex 2 of the NPPF, namely sites which:

- Have outline planning permission for major development;
- Are allocated in a Development Plan;
- Have a grant of permission in principle; or
- Are identified on a brownfield register.

2.23 PPG also provides clarity on the scope of evidence which can demonstrate deliverability, including:

- *Current planning status* – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- *Firm progress being made towards the submission of an application* – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- *Firm progress with site assessment work*; or
- *Clear relevant information about site viability, ownership constraints or infrastructure provision*, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

⁴ Planning Practice Guidance: Housing supply and delivery (Paragraph: 007 Reference ID: 68-007-20190722)

3.0 5YHLS – Assessment of the Council's Housing Supply

- 3.1 On the basis of published information and the reporting at the time of refusing planning permission for the appeal proposals, the following are matters of agreement.

Identifying the base date and five-year period

- 3.2 The base date is the start date for the five-year period for which both the requirement and supply should relate. It is agreed that the relevant base date for assessing the 5YHLS for the purposes of this appeal is 1st April 2025 and the relevant 5YHLS period is to 31st March 2030.
- 3.3 The Council should not attempt to introduce new sites which are not already within its schedule of sites. This would effectively mean changing the base date to beyond 1st April 2025. Within this context, there have been several appeal decisions, which have found such an approach to be inappropriate.
- 3.4 However, this Statement takes account of other factors and evidence that has come to light after the base date for sites identified in the supply in the 5YHLS Statement 2025 (e.g. where an identified site has subsequently gained planning permission). This is in accordance with the approach taken by Inspectors at *Woolpit*⁵ and *Woburn Sands*⁶.

Identifying the basis for calculating the housing requirement

- 3.5 In order to remain effective, the NPPF Paragraph 34 states that policies in local plans should be reviewed at least once every 5 years and updated as necessary. This reflects Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)⁷ which took effect as legislation from 6th April 2018.
- 3.6 In accordance with Paragraph 78 of the Framework and footnote 39 of the Framework, it is agreed that the 5YHLS should be measured against the local housing need calculated using the standard method set out in the PPG.
- 3.7 The Council accept that the basis of establishing the housing requirement is LHN, with the adopted strategic housing requirement under Key Statement H1 now rendered out

⁵ Appeal Ref: APP/W3520/W/18/3194926 - Land on east side of Green Road, Woolpit

⁶ Appeal Ref: APP/Y0435/W/17/3169314 - land to the west of Newport Road and west and east of Cranfield Road, Woburn Sands, Bucks

of date. Rolling this LHN requirement forward, the minimum housing requirement planned for Ribble Valley to 2030 equates to 1,635 dwellings.

- 3.8 However, whether or not it is appropriate to offset the local housing need figure against previous years of claimed 'oversupply' remains a key matter of disagreement with the Council.

Applying the appropriate buffer

- 3.9 In accordance with Paragraph 78a) of the Framework, the 5% buffer applies.

Oversupply and demonstrating a 5YHLS

- 3.10 Whilst both parties do not agree on appropriateness of factoring oversupply into the 5yhs calculation. Both parties do agree that the Council are unable to demonstrate a 5YHLS if it is determined that the use of 'oversupply' to deduct from the forward-looking housing requirement is not permissible in this case.

4.0 ISSUE 1 – Should any “oversupply” be deducted from the five year housing requirement?

National Policy Context and Decision Making on ‘Oversupply’

- 4.1 The PPG⁸ only provides guidance on how to deal with over-supply in the context of offsetting ‘any shortfalls against requirements from previous years’. The PPG is silent on whether the same approach can be undertaken to offset against future housing requirements in the Plan period. In our view, if the reverse approach was intended the guidance would say so.
- 4.2 The absence of any planning policy or guidance supporting the Council's approach is, in our view, a deliberate omission by the Government. The PPG provides comprehensive guidance on how to calculate the 5YHLS. There is no requirement for additional steps which are not addressed in the PPG.
- 4.3 The PPG is a “living document”, which can be updated to address new issues. The fact that the SoS has chosen not to change either the NPPF (in the December 2024 changes) and/or the PPG suggests that the SoS does not consider that an allowance for past oversupply should be used to reduce the 5YHLS requirement. This would be consistent with the national policy imperative to boost significantly the supply of housing.
- 4.4 It should be noted that the matter has been the subject of High Court litigation and a number of Appeal Decisions. Appeal decisions have consistently drawn out the Government's objective for the planning system and its key role in addressing the UK's housing crisis through increased housing delivery.
- 4.5 Set against this backdrop, the housing requirements set for LPAs, especially in the policy context of the RVCS, clearly represents a minimum requirement. If every time the minimum is exceeded and an LPA is allowed to reduce the requirement in the next five years, then LPAs will only ever be delivering the absolute minimum. It is unanswerable that this is contrary to the national imperative of significantly boosting the supply of housing.

⁸ Planning Practice Guidance: Housing supply and delivery (Paragraph: 032 Reference ID: 68-032-20190722)

- 4.6 The latest conclusions on the matter of 'oversupply' taken by Secretary of State (SoS), are set out in the recovered appeal at land south of Oakridge in December 2018. The SoS decision⁹ noted that:

'The Secretary of State has carefully considered the Inspector's assessment of housing demand and of housing land supply, as set out at IR198-221. For the reasons given in that assessment, he agrees with the Inspector's conclusions that 520 homes per year are required (IR209)'

- 4.7 Although the Inspector and SoS went on to find that the appeal should be dismissed, Tewkesbury Council subsequently challenged the SoS decision in the High Court. The claim made by the LPA was that Tewkesbury Borough Council sought to challenge the decision on the basis that the Secretary of State's interpretation of the housing land supply, more specifically the approach to oversupply, was incorrect.
- 4.8 This issue was the subject of a legal challenge at the High Court¹⁰ in 2019 where Dove J accepted that, in the absence of any policy to interpret, it was a matter of planning judgement as to how the decision-taker treated an element of oversupply.
- 4.9 Dove J recognised that in the absence of any policy for legal interpretation, under the NPPF or PPG, then it remains a matter of planning judgement as to whether offsetting oversupply could be permissible in the calculation of a 5YHLS.
- 4.10 It is, however, significant that if it was the policy and guidance of the SoS to allow for oversupply, the SoS would have granted planning permission and amended PPG accordingly to bring clarity to the matter. On the contrary, PPG wasn't updated until 22 July 2019 shortly following Dove J's judgement to uphold the SoS decision.
- 4.11 The only update to PPG made by the SoS on 'Housing Supply and Delivery' was the inclusion of Paragraph: 023 Reference ID: 68-032-20190722 which states that:
- 'Where areas deliver more completions than required, the additional supply can be used to offset any shortfalls against requirements from previous years'. (NJL emphasis)*
- 4.12 In the 6-year period since the last update to PPG, there has been a chronology of iterations and amendments to NPPF on this specific matter in response to a plethora of similar appeal decisions.

⁹ Appeal ref: APP/G1630/W/17/3184272 - Land South of Oakridge, Highnam, Gloucester – Para.14

¹⁰ Tewkesbury Borough Council v Secretary of State for Communities Housing and Local Government & Ors [2019] EWHC 1775

- 4.13 The former Government's position in the December 2023 NPPF (Paragraph 77) was that:
- 'National planning guidance provides further information on calculating the housing land supply, including the circumstances in which past shortfalls or over-supply can be addressed.'*
- 4.14 At that time, the 2023 NPPF indicated that there are circumstances permitting oversupply to be counted against upcoming supply and that the PPG would be updated to show how this would be applied. Publication of such guidance didn't materialise.
- 4.15 Following the General Election, the new Labour Government swiftly published the July 2024 NPPF consultation within which Question 8 directly asking the question on whether to proceed with the proposed removal of this wording from Paragraph 77.
- 4.16 The 2024 NPPF publication did remove this text reference which suggested a marked change in position from the former Government in that the offsetting of over-supply would not be permissible. However, it is acknowledged that the supporting consultation outcome paper set out the Government's position on Question 8, stating that the omission in the revised NPPF *'has no bearing on local authorities' ability to account for over-supply – this can continue to be taken into account as it is currently'*.
- 4.17 The Government's response noted that this remained a matter to be kept 'under review', however given the very deliberate removal of text under national policy, this response should not be taken from LPAs as a full endorsement to this methodological approach.
- 4.18 Following this chronology through, there remains no material change in national policy on the issue of oversupply. The latest authority on this matter remains the High Court judgement in Tewksbury¹¹ where the LPA challenged an appeal at Land off Ashmead Drive, Gothington (Appeal Ref: APP/G1630/W/20/3256319). The judgement confirmed the absence of policy or guidance on this point. Accordingly, a challenge based on a misinterpretation of policy must fail, as was clear from other decisions.
- 4.19 While there are several appeal decisions grappling with this methodological issue, the most recent assessment and policy interpretation on the matter of 'oversupply' is set out

¹¹ Tewkesbury Borough Council v Secretary of State for Housing Communities and Local Government [2021] EWHC 2782 (Admin) (18 October 2021)

in the appeal decision at Bordon Hill, Stratford upon Avon¹² in September 2025. The Planning Inspector determining that particular case noted that:

*'National policy, including the Planning Practice Guidance (PPG), does not exclude the use of oversupply to offset future requirements and only refers to it offsetting any shortfalls against requirements from previous years¹³. However, the PPG is clear that under-delivery does not need to be addressed separately when establishing LHN as it forms part of the affordability indicators that inform LHN¹⁴. **It follows that the same approach should be taken to oversupply (over-delivery) as more houses should improve the affordability of properties locally.**' (NJL Emphasis added)*

4.20 This represents the most up to date authority on the matter.

4.21 Overall, therefore it is accepted that a planning judgment can therefore lawfully be exercised, allowing an LPA to offset oversupply from a forward-looking housing requirement, however that is a different matter from **how** such a judgment should be exercised. That is a matter addressed in full in evidence below.

Factors affecting a Planning Judgement on use of 'Oversupply' in Ribble Valley

4.22 The Council's revised methodological approach to 5YHLS attempts to artificially reduce their housing requirement to 214 dpa. Their sole reason for this is that the Government have not explicitly stated in the NPPF and PPG that it this is not a lawful approach. No further evidence underpins the Council's approach and whether it is most appropriate and it is not the case that this has been a longstanding consistent approach held by the Council.

4.23 Furthermore, even if it were accepted that it was appropriate to factor in oversupply, then this can only be applied to the housing requirement so far as it is covered under the current Plan period which is due to expire 31st March 2028. At best for the Council, oversupply should only be factored into housing land supply calculations and that is a point that the Council themselves have failed to acknowledge but which should be irrefutable.

¹² Appeal Ref: APP/J3720/W/25/335884 - Orchard Adjacent to Chutneys, Bordon Hill, Stratford upon Avon – Para. 66

¹³ PPG Paragraph: 023 Reference ID: 68-032-20190722

¹⁴ PPG Paragraph: 022 Reference ID: 68-031-20190722

- 4.24 Contextually the Council's position on oversupply is one which has been adopted very recently and did not refer to oversupply in any published Annual Monitoring Report monitoring housing delivery through the adopted Plan period.
- 4.25 In fact, in the Council's 2024 Five Year Supply Statement published April 2025 there is no mention of oversupply being factored into the requirement calculation. In May 2025 barely a month later, the Council then introduced an updated report (2025 Five Year Supply Statement (May 2025) now factoring in oversupply from previous years housing delivery to reduce the Council's housing requirement.
- 4.26 In response to the LHN figures published under the revised Standard Methodology (December 2024), the Council have had to change their methodological position on 5YHLS in an attempt to reduce their housing requirement to a level whereby a 5YHLS can be demonstrated.
- 4.27 It is quite clear, therefore, why the LPA is seeking to use this allowance. Indeed, the timing and sudden introduction of this allowance into the Council's 5YHLS Statement (2025) compared to the 5YHLS Statement prepared for 2024 is, in of itself, telling.
- 4.28 As a consequence, the Council now suggest they can demonstrate a five-year housing land position of 6.2 years¹⁵ based upon a significantly reduced annualised housing requirement of just 214 dwellings (inc. 5% buffer).
- 4.29 To the contrary, there are a variety of reasons and points of evidence to contest the appropriateness of factoring oversupply in this particular instance.
- 4.30 In a general sense the Appellant does not fundamentally disagree with the term oversupply in the context of housing delivery. In reality, what it describes is that more than the bare minimum is being delivered. That is contrary to the national policy imperative to boost significantly the supply of housing and the RVCS imperative to deliver a *minimum* number of houses across the Plan period as a whole and is clearly at odds with government policy.
- 4.31 The adopted Core Strategy sets a housing requirement of 5,600 homes at an average of 280dpa for the period 2008-2028. Table 3 identifies the Council's performance over the plan period against this requirement.

¹⁵ Ribble Valley Five Year Housing Supply Statement (May 2025) Para. 8.3

Table 3: Summary of Net Housing Completions in Ribble Valley against the Trajectory

	Housing Requirement	Net Housing Completions	Difference (+/-)	Cumulative Difference
2008/09	280	75	-205	-205
2009/10	280	89	-191	-396
2010/11	280	69	-211	-607
2011/12	280	147	-133	-740
2012/13	280	172	-108	-848
2013/14	280	183	-97	-945
2014/15	280	345	+65	-880
2015/16	280	300	+20	-860
2016/17	280	390	+110	-750
2017/18	280	400	+120	-630
2018/19	280	412	+132	-498
2019/20	280	559	+279	-219
2020/21	280	453	+173	-46
2021/22	280	499	+219	+173
2022/23	280	546	+266	+439
2023/24	280	349	+69	+508
2024/25	305	333	+28	+536
2025/26	305	254	-51	+485
2026/27	305	256	-49	+436
2027/28	305	187	-118	+318
Total	5,700	6,018	-	+318

- 4.32 Table 3 identifies that the Council failed to deliver enough housing to meet the annual requirement for the first 6 years of the plan period. In fact, up until the end 2014, the Council were some 945 homes short of meeting the requirement to that stage. Only 735 homes were delivered against a requirement of 1,680 homes representing a delivery rate of just 44% of the minimum requirement.
- 4.33 That period pre-dates the adoption of the Core Strategy (December 2014) and serves to highlight the inherent issues in housing delivery within the Borough at times when there was a lack of an adopted housing requirement.
- 4.34 Subsequently there was a period following the adopting of the HEDP when delivery exceeded annual housing targets, however it is clear once more that due to development of housing allocations already having taken place, delivery figures are once again dropping to levels significantly below the LHN requirement.

- 4.35 Our assessment suggests that 863 dwellings will be delivered between 1st April 2025 to 31st March 2028 which, combined with completions to date, suggests that a total of 6,018 dwellings will have been delivered over the Plan period.
- 4.36 While this may appear significant in absolute terms, when set against the annual requirement to deliver a minimum of 5,600 dwellings over a 20-year Plan period, this 'oversupply' of 418 dwellings equates to an exceedance of just 7%¹⁶.
- 4.37 In this regard, the expression "oversupply" has no resonance. In the context of a (now out of date) minimum housing target and a national planning policy imperative to boost significantly the supply of homes, delivering more than the minimum number of homes in any given year does not constitute an "oversupply" which needs correcting, especially in the absence of any land use planning harm which might flow from such a claimed "oversupply". Nonetheless, the term is referred to in this Statement simply for convenience (in the manner in which it is used by the Council) to mean delivery over the minimum housing requirement.
- 4.38 Taking into account the requirement to plan against the LHN figure for the years 2024/25 to 2027/28, this 'oversupply' diminishes further to 318 dwellings (5%) prior to any annual fluctuations to the LHN when accounting for local affordability updates.
- 4.39 As the Council's supply evidence and our analysis on projected completions suggests this will fail to deliver anywhere near the level previously achieved in the Plan period and well below the annual, average housing requirement under Key Statement H1 or LHN. This is particularly significant as it risks undermining early delivery of the emerging Local Plan.

The Need to Significantly Boost the Supply of Housing

- 4.40 There is clear precedent in appeal decisions which show that Inspectors have taken a strong stance on consistency with the objectives of the NPPF. The allowance of oversupply elsewhere has been assessed on several occasions as being contrary to the national planning policy imperative of significantly boosting the supply of housing land.
- 4.41 The rationale for significantly boosting housing land and the associated benefits include:
- i. Significantly boost the availability of housing land for new development;
 - ii. Increasing choice and competition within the housing market;

¹⁶ $418 / 5600 \times 100 = 7.4\%$

- iii. Providing housing for all types of needs within the local community;
- iv. Increasing housing supply in order to avoid price inflation as a result of growing demand and worsening affordability; and
- v. Supporting the strategic delivery of affordable dwellings to meet identified local needs.

4.42 In this case, the wording of Key Statement H1 states that land will be made available for 5,600 dwellings at an average annual completion target of 280 dwellings per year across the plan period. The supporting text explicitly states at para 6.4 that **'these figures will be treated as a minimum target unless otherwise determined.'**

4.43 These words supporting the adopted policy were required to ensure the policy was consistent with national policy at the time in order that the Plan may be found sound.

4.44 The Core Strategy is now 11 years old from adoption and at no stage has the LPA undertaken their statutory duty under Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to fully or partially review the Core Strategy; in particular the strategic housing requirement and whether or not this remains an appropriate basis to plan against.

4.45 This is despite KSH1 stating that *'the overall housing requirement will be subject to a formal review within five years from the date of adoption of the Core Strategy to ensure it remains the appropriate strategic figure with which to plan'*.

4.46 While the Housing and Economic Development DPD was adopted within five years on October 2019, the scope of the DPD was not to re-appraise the objectively assess housing need (OAN) target but instead *'clearly limited to allocating sites to meet the need established in the CS'*¹⁷.

4.47 In the context of the material change in local and national circumstances, particularly with respect to national planning policy and the Standard Methodology, the strategic housing requirement underpinning the Plan is now plainly out of date. Housing needs must be planned for against the annual requirement set by the LHN figure.

4.48 The extent to which affordable housing needs have nearly trebled in the last five years, from 88 affordable dwellings per annum in 2020¹⁸ to 230 dwellings per annum in 2025¹⁹,

¹⁷ Report on the Examination of the Ribble Valley Local Plan, Housing and Economic Development, Development Plan Document (2019) - Para. 7

¹⁸ Strategic Housing and Economic Needs Assessment (2020)

¹⁹ Affordable Housing Needs Assessment (2025)

alongside the increased Standard Method figure, illustrates the outdatedness of the housing target and the failure of the Plan to properly deliver the requisite level of homes to meet local needs.

- 4.49 The Council's proposition is to significantly reduce their housing requirement to just 65% of the LHN figure. This would clearly contradict what the planning system is expressly seeking to achieve in terms of significantly boosting the supply of housing land for both open market and affordable needs. These qualitative supply matters are considered in further detail below.

Meeting all Housing Needs and the Qualitative Nature of the Supply

- 4.50 The Council's proposition to intentionally suppress a housing requirement to just 214 dpa represents a clear disregard for meeting a wide range of housing needs, particularly affordable housing.

- 4.51 The Appellant's evidence is that although the Council have exceeded a now out of date housing target (which in of itself is set as a minimum housing requirement):

- Over the Plan period the Council has achieved the **net delivery of 1,324 affordable dwellings**²⁰, an average of 78 affordable dwellings per annum. This is equivalent to **25% of average completions**, which falls below the Key Statement H3 requirement of 30% provision.
- The 2025 Affordable Housing Needs Assessment represents the evidence base document to support the development of housing policies relating to the emerging Ribble Valley Local Plan and is to be given most weight. The assessment was ironically published on the same month as the Council's 5YHLS Statement, showing that against a reduced housing requirement of just 214 dpa, the affordable housing needs in Ribble Valley have increased dramatically from 84 affordable dwellings per annum, as identified in the Core Strategy, to **230 affordable dwellings per annum**.
- Based on the Council's deliverable supply this will deliver at best 302 affordable dwellings²¹ over the next five years – just **60 affordable dwellings per annum** and **23% when compared against the Key Statement H3 requirement of 30%**. Our

²⁰ See Figure 4.2 of Affordable Housing Statement prepared by Tetlow King

²¹ $1,324 - 317 = 1,007 \times 30\% = 302$ affordable dwellings (2025-30) = 60 affordable dpa

Calculation discounts those sites in the RVBC supply which are not liable to affordable housing requirements: C2 Permissions (-76) + Allocation Sites (-8) + Full Planning (-8) + Under Construction (-10) + Small Sites (-215) = -317

assessment on supply suggests the delivery of affordable housing will be even lower.

- The deliverable supply of affordable housing will **only meet 26% of identified affordable needs**²² at a time when the Council are knowingly acting to suppress their housing requirement to just 214 dpa and the forward supply of new sites is clearly falling off a cliff in comparison to previous delivery rates over the Plan period. This is equally applicable to the delivery of accommodation to meet the needs of over 55's population to which further evidence will be presented at inquiry. The absence of any meaningful progress on the preparation of a New Local Plan beyond 2028 further undermines the Council's ability to address these acute housing needs.

4.52 Core Strategy Strategic Objective 2 (Para 3.12) states the need to *'To increase the supply of affordable and decent homes in the borough to help meet identified needs'*. The Council's continued failure to meet affordable housing needs is in this policy context a clear conflict with SO2.

4.53 SO2 is inextricably linked to housing delivery across the Borough which is underpinned by Key Statement H1. While the Council assert that they have delivered a numerical quantum of housing completions, in this policy context, the Council's continued failure to meet affordable housing needs represents a clear policy conflict with the Plan as a whole. The Council is therefore knowingly ignoring the affordable element of delivery which has real world consequences.

4.54 In the same month the Council published its latest Five Year Supply Statement and introducing oversupply reduction to its future supply, it also published an Affordable Housing Needs Assessment (May 2025) which identifies a stark increase in affordable housing needs within the borough of 230 dwellings per annum. The Council's 5YHLS methodology is therefore inherently misaligned to this evidence base and will demonstrably fail to deliver anywhere near the level of affordable housing required for Ribble Valley.

4.55 Further, it is put forward by the Appellant that the qualitative nature of the supply, based on the Council's own evidence, should be questioned as summarised in Table 4 below:

²² $305 / (230 \times 5) \times 100 = 26\%$

Table 4: Summary of qualitative assessment into the Council's deliverable supply

Indicator	Total
Site Allocations delivery	177 dwellings (13% of the total deliverable supply)
Windfall allowance	1,147 dwellings (87% of the total deliverable supply) ²³
Small site allowance (<10 dwelling schemes)	232 dwellings ²⁴ (18% of the total deliverable supply)
Affordable housing (dwellings/ %)	302 dwellings (23% of the deliverable supply)
Located within other Tier 1 and Tier 2 Villages	154 dwellings (12% of the deliverable supply)
Dwellings permitted in Langho	0 dwellings

- 4.56 The qualitative assessment raises a wide range of concerns but most principally an increased reliance on windfall allowance which does not represent a robust basis for a forward supply. The supply currently relies on a significant number of landowners and developers which adds greater complexity and risk.
- 4.57 The deliverable supply is of a relatively weak composition and will evidently not meet a wide range of needs, in accordance with Strategic Objectives and NPPF Paragraph 63. This is particularly prevalent on affordable housing and older person housing needs. In this context, the Council should be seeking to bolster their supply as opposed to suppressing their housing requirement so significantly.
- 4.58 It is also telling that despite being the most sustainable of the 32 defined settlements, there remains a complete absence of any development forecasted within Langho over the next five years. The spatial growth of development within Langho in the context of other settlements within Ribble Valley is considered separately within the Statement of Case.

The Need to Address both 5YHLS and the HDT

- 4.59 Beyond 5YHLS requirement there is the requirement of the Housing Delivery Test (HDT) which is separate but complementary to the requirement for a 5YHLS introduced to ensure consistency of delivery to meet local needs.

²³ Calculation (large windfall sites (397) + small windfall sites (265) + windfall allowance (183) = 845 dwellings/ 1504 dwellings x100 = 56%

²⁴ Including small sites which are included as committed sites in the 5YHLS

4.60 Failure to meet either test triggers the application of the 'tilted balance'. The Council's own supply calculation would deliver 65% of its HDT requirement based on Standard Method²⁵, and therefore unanswerably Ribble Valley would fail the HDT, engage the tilted balance and subsequently require an Action Plan to remedy the shortfall. This in itself demonstrates the flaws of this approach and inconsistencies with NPPF.

4.61 For reference, this matter was tackled in the appeal decision at Rascals Farm, Shipley Road, Southwater²⁶:

'I am cognisant that the Council have significantly exceeded the number of homes required under the Housing Delivery Test (the 'HDT'). However, this is a measure of housing delivery, as opposed to housing supply. Despite the Council's good track record when assessed against the HDT, the supply of deliverable housing sites within the District has fallen below five years. In such circumstances, the tilted balance contained in paragraph 11(d) of the Framework is engaged.'

4.62 There is a clear distinction between supply and delivery. To rely on historic delivery to suppress an established current need figure for an immediate future period will go no way to meeting the evidenced requirement for housing within a defined area. From a real-world perspective, it is simply of no use to those requiring a home either on the open market or for affordable tenure now and disregards the fact that housing needs are a 'flow' rather than 'snapshot' reflecting the real-world dynamic situation of existing households falling into need as their circumstances change and new households forming.

4.63 The absence of guidance on oversupply is irrelevant as the introduction of HDT in 2018, alongside the Standard Method, makes clear the time horizon Government are willing to accept for housing delivery records.

4.64 The HDT explicitly 'rewards' those LPAs which over deliver/exceed annual or rolling minimum targets (in the words of the Council), as the three-year period allows for fluctuations year on year.

4.65 The introduction of the HDT represents a significant change to Government policy since the adoption of the Ribble Valley Core Strategy (RVCS) in 2014 and it is telling that the Government do not provide any incentives for exceeding targets. Instead, there are

²⁵ $214/327 \times 100 = 65\%$ (inc. 5% buffer)

²⁶ Rascals Farm, Shipley Road, Southwater (Appeal Ref: APP/Z3825/W/20/3257700) - Para. 115

clear repercussions for those that under deliver, namely Action Plans and engagement of the 'tilted balance'.

- 4.66 In the context of the NPPF and national objective to significantly boost the supply of housing, this is achieved by delivering in tandem the two policy tests – 5YHLS and HDT. These policy tests cannot be divorced from one another, otherwise this will fail to deliver on the identified national objective of the planning system. The Council's proposition therefore introduces a tension that cannot be resolved in that it will intentionally suppress the forward supply of sites.

The Need to Maintain a Strong, Forward Looking Supply up to and Beyond 2028

- 4.67 It is noted that the five-year supply runs to 31st March 2030, at which time the Plan period for the RVCS will have ended well before in March 2028.
- 4.68 Notwithstanding this, the need for housing will not stop at the end of the Plan period or the five-year period. Indeed, there must be continuity of supply extending beyond 2030 however there is only an identified supply of 274 dwellings within the Council's 'large sites trajectory'²⁷ beyond the current five-year period.
- 4.69 The standard method demonstrates that the housing requirement in Ribble Valley must be significantly increased on the basis of the local housing need figure which will extend beyond 2030. The Council's proposition will intentionally lead to an undersupply which will need to be made up over the next plan period. This does not provide a strong basis for a new plan but is precisely what the Council are planning for.
- 4.70 This is significant as there has been no material progress to date on the emerging Local Plan to replace the RVCS, with the Council already falling behind their revised timeframes in the March 2025 Local Development Scheme, suggesting further delays to the plan-making process²⁸.
- 4.71 For the above reasons, planning permission must be granted now to maintain a continuity of supply up to and beyond 2028.
- 4.72 Furthermore, with the Plan period shortly expiring in 31st March 2028 and with no active progress being made on a new Local Plan, there is no basis for the Council to suggest that an allowance of past 'over-delivery' against an out of date housing target, can then continue to be relied upon to artificially reduce the annual housing requirement

²⁷ RVBC 5YHLS Statement (2025) - Appendix B

²⁸ Local Development Scheme 2025 (Appendix 2 - LDS Timetable)

for those years beyond the Plan period. It is unanswerable that for those years beyond the Plan period (2028-2030) this can only rely upon the full LHN figure.

- 4.73 The Council's use of oversupply and proposition that this can be spread out across the entire five-year period (2025-30) cannot be justified and demonstrates the lack of methodological rigour being applied by the Council in their 5YHLS assessment.
- 4.74 A revised assessment using the Council's own supply evidence has therefore been calculated on the basis (see Table 4) that even if a determination is made that oversupply can be applied in this circumstance, then this can only be deducted from the forward-looking requirement over the remaining years of the Plan period (2025-2028).
- 4.75 The Council's approach is therefore at odds with a strict interpretation of national policy and should therefore not be accepted on that basis.
- 4.76 Those reasons are as follows:
- The wording of Key Statement H1 is explicit that the housing target does not represent a ceiling and is to be achieved by an annualised average requirement to deliver at least 280 dwellings each year. This strategic housing requirement has been found to be plainly out of date and without review since adoption of the Plan in 2014 following which there have been highly material change in circumstances at a national policy level seeking to significant boost housing delivery.
 - The exceedance of a minimum requirement does not therefore constitute 'oversupply' especially in the national context of significantly boosting the supply of housing land in the midst of a housing crisis. If the Council's proposition was accepted, then one would only deliver the absolute minimum required which is contrary to the NPPF.
 - The Council's deliverable supply, based on their own evidence, will continue to result in a shortfall of affordable housing and is being suppressed to 26% of actual identified needs (based on a revised assessment published at the same time as the 2025 5YHLS Statement). This approach represents a clear policy conflict with the Strategic Objectives²⁹ and the plan as a whole.

²⁹ Ribble Valley Core Strategy (2014) - Para 3.12

- There is a clear need to ensure the strong delivery of housing up to and beyond 2028 in order to provide a robust basis for the emerging Local Plan. The Council's proposition will only stall housing delivery and result in a significant shortfall that will need to be captured under a new plan.
- 4.77 In order to deliver the national imperative of significantly boosting the supply of housing (as emphasised by relevant appeal decisions), national planning policy sets out the relevant tests for housing land supply and delivery which should work in parallel.
- 4.78 Chiefly, the introduction of the Standard Methodology which derives the Council's LHN figure (as accepted by the Council) already 'bakes in' previous years of delivery into the calculation of local housing need through the affordability uplift (and its supporting indicators such as the five-year average affordability ratios).
- 4.79 Indeed, the HDT is deemed to be critical to the Council's case in that it sets a three-year delivery period and **not** backdating to the start of the Plan period.
- 4.80 Accordingly, it is concluded that there are clear reasons and material considerations as to why the 5YHLS in Ribble Valley should not be calculated on the basis of an artificially reduced housing requirement which factors in 'oversupply' over the Plan period.
- 4.81 Should a different judgement be reached, then self-evidently, such an allowance cannot be justified beyond the end of the Plan period which expires on 31st March 2028. The Council's proposition on their annual requirement will therefore need to be adjusted in any event, where at best the oversupply should only be factored into housing land supply calculations for years 1-3 as set out in the accompanying calculations.

5.0 ISSUE 2 – What is the Council's deliverable housing supply?

- 5.1 The Council's assessment on the deliverable supply of housing land between 1st April 2025 to 31st March 2030, is set out in the latest Five Year Housing Supply Statement which considers that 1,324 dwellings are deliverable.
- 5.2 Taking note of the definition of 'deliverable' set out under NPPF and PPG, the Appellants' assessment of the deliverable supply position in Ribble Valley is that **1,017 dwellings** will be delivered over the next five-year period, a total reduction of **307 dwellings** against the Council's latest position.
- 5.3 This position is summarised in Table 5 below.

Table 5: Summary on Ribble Valley Council's Deliverable Supply

Deliverable Supply (2025-30)	Appellant's Position	RVBC's Position	Difference
C2 Permissions	76	76	0
Allocation Sites	107	177	-70
Full Planning Sites	82	85	-3
Outline Planning sites ³⁰	0	41	-41
Under Construction & Commenced	596	730	-134
Small Sites ³¹	156	215	-59
Deliverable Supply	1017	1324	-307

- 5.4 A summary of sites which are disputed sites is set out below:

Council Evidence Base Ref	Site Address	Consented/ Capacity (net)	RVBC 5YHLS	Appellant 5YHLS	Difference (+/-)
Allocated Sites					
EV52	Land at Highmoor Farm	100	75	0	-75
Sites with Full Planning Permission					
EV47	Land at Accrington Road, Whalley	74	77	74	-3

³⁰ Note that the above addresses a point of consistency in the RVBC Supply Statement 2025 which includes Site Allocation HAL 5 - Highmoor Farm as an outline commitment. This has now been included in the Allocation Sites.

³¹ RVBC assume a 43dpa allowance between 2025-30 based on small site completions between the period of 01.04.2015 - 31.03.2025. The Appellant's position on small site windfall allowances is set out below.

Sites with Outline Planning Permission					
EV14	Standen – Phases 5 and 6, Land at Higher Standen Farm & Part Littlemoor Farm	386	41	0	-41
Sites Under Construction or Commenced					
EV6	Spout Farm, Preston Road	2	2	0	-2
EV10	Standen Phases 2,3 & 4; Land at Pendle Road	294	294	250	-44
EV19	Land SW Barrow & West of Whalley Road, Barrow – Parcel B	2	2	0	-2
EV37	Chipping Lane, Longridge – Phase 1	124	5	0	-5
EV39	Land West of Preston Road, Longridge	268	95	67	-28
EV58	Land at Neddy Lane, Billington	36	17	11	-6
EV59	74 Higher Road and land to the rear, Longridge	123	122	75	-47
Disputed Sites (Sub-total)			730	477	-253

5.5 An individual assessment of each site is summarised below drawing upon my review of the Council's evidence base and observations made through multiple site visits. It should be noted that a Freedom of Information Request has been submitted to the local authority to secure the dates upon which Completion Notices have been issued on these sites to verify the observations made during site visits.

5.6 In addition, the Council's assumptions on small windfall sites and their contribution to the deliverable supply are also challenged.

Allocated Sites

Land at Highmoor Farm, Clitheroe (Council Ref: EV52; Allocation Ref HAL5)

5.7 The site has been assessed against the definition of 'deliverable' under the NPPF which states that '*to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a **realistic prospect** that housing will be delivered on the site within five years*' [NJL emphasis]. For those housing allocations which do not have detailed planning permission, the definition adds

that sites 'should only be considered deliverable where there is **clear evidence** that housing completions will begin on site within five years'.

- 5.8 The site is allocated (ref: HAL5) for residential development in the RVBC Housing and Economic Development DPD (2019) with an indicative capacity of 100 dwellings. Outline planning permission ref: 3/2020/0601 was granted in February 2023 for 125 dwellings. There has been no Reserved Matters submission pursuant to the approved Outline planning permission.
- 5.9 The Council point to limited evidence provided by the planning agent representing the landowners that suggests completions will come forward from 2027/28 averaging at a build rate of 25 houses per annum. The Council assert that on this basis 75 dwellings should be accounted for in the 5YHLS.
- 5.10 The Council's trajectory for the site is unrealistic. There is no evidence of a developer attached to the site nor that there has been any further progress made since the grant of permission on 8th February 2023. Indeed, there is now less than 4 months until the outline planning permission lapses unless a Reserved Matters application is submitted beforehand. The lack of progress made in disposing of the site to a developer to bring forward a detailed scheme, or any evidence of public consultation or ongoing pre-application discussions with the Council, leads to the conclusion that this deadline will not be met.
- 5.11 From a technical perspective the proposed access strategy off Highmoor Park is particularly constrained in terms of land ownership and is wholly reliant upon Council owned land to facilitate this primary access point. This would strongly suggest a ransom scenario which has evidently frustrated the delivery of the site moving any further than the outline stage.
- 5.12 The Council has not provided clear evidence of firm progress being made towards the submission of a Reserved Matters planning application (or a new detailed planning application). The Council has not provided a written agreement with a developer confirming their anticipated start and build-out rates align with those proposed by the Council. It is also not known who the developer(s) would be.
- 5.13 In the context of the Annex 2 definition set out in the NPPF, the site is not considered deliverable in the five-year period, and **75 dwellings** should be removed from the Council's supply figure.

Sites with Full Planning Permission (not under construction)

Land at Accrington Road, Whalley (Council Ref: EV47)

- 5.14 The Council's evidence base (ref: EV47) notes that the site benefits from an extant planning permission for 77 dwellings. More specifically, an outline planning permission (3/2012/0179) and reserved matters approval (3/2016/0344) for residential development for the elderly (people aged over 55) comprising 37 no. bungalows and 40 no. retirement apartments in three linked two storey buildings.
- 5.15 The Council point to information from the agent suggesting delivery could start from 2026 and the authority considers completions from 2027/28 at a rate of 20 completions per year to be a reasonable estimate.
- 5.16 The site has since been the subject of a planning appeal (ref: APP/T2350/W/25/3368139) by a different developer (Oakmere Homes) which was allowed in October 2025 for detailed planning permission for 74 dwellings.
- 5.17 The site is therefore under the control of a new developer who are clearly looking to progress on the basis of a different planning permission which now proposes a minor reduction in dwelling numbers. There is clear evidence that the extant permission, which has seen limited progress since the lawful implementation in 2018, will not be progressed.
- 5.18 Accordingly, **3 dwellings** should be removed from the supply.

Sites with Outline Planning Permission

Standen – Phases 5 & 6, Land at Higher Standen Farm & Part Littlemoor Farm (Council Ref: EV14)

- 5.19 Our assessment upon achievable build rates at Higher Standen Farm are tempered down to 50 dpa which balances the scale of the site and opportunity for multiple outlets, along with the constrained size of the local housing market to accommodate a higher level of market absorption.
- 5.20 Accordingly, the anticipated completion of Phases 2, 3 and 4 is not until 2030/31 hence the ability to commence on these latter phases is not achievable before that date.
- 5.21 A reserved matters application for phases 5 & 6 comprising 265 dwellings was submitted on 24 March 2020 and is still pending determination now five years on. There is no clear evidence for inclusion in the supply.

5.22 Therefore, no units should be accounted for in the 2025-30 period – a reduction of **41 dwellings** from the Council's supply.

Sites Under Construction or Commenced

Standen Phases 2,3 & 4; Land at Pendle Road, Clitheroe (Council Ref: EV10)

5.23 The Council assert that all 294 dwellings consented for Phases 2 – 4 at the site will be delivered in the five-year period. Whilst the rate of completions over the last two monitoring years has ranged between 55 dpa to 65 dpa, the rate of delivery observed this year based on site visit observations identifies 10 completions between the period of May to November 2025 suggesting a tempering in build rate. This is likely due to Phase 1 now being fully completed and Phase 2 similarly nearing completion (with 19 plots remaining as of the November 2025 site visit). Therefore, the ability for Taylor Wimpey to build from two outlets east and west of the primary spine road, at least for the foreseeable, is not possible until additional road infrastructure is continued through the site.

5.24 My assessment upon achievable build rates at Higher Standen Farm are therefore tempered accordingly down to 50 dpa resulting in 250 completions over the five-year period. This also takes into account the scale of the site and opportunity for multiple outlets, along with the constrained size of the local housing market to continue to maintain a high level of market absorption.

5.25 Taking the above analysis, a reduction of **44 dwellings** is taken from the supply.

Land West of Preston Road, Longridge (Council Ref: EV39)

5.26 The site has planning permission following reserved matters approval 3/2018/0105 in May 2018 for 275 dwellings. Development is underway with Tilia Homes on site. The Council suggest that there are 95 dwellings still to be constructed as of the date of the 2025 5YHLS Statement.

5.27 A site visit was conducted by on 5th September 2024, confirming that 97 dwellings remain under construction on the site. As a result, NJL added these 97 dwellings to the supply, with a build-out rate of 30 dwellings per annum from the 2024/25 to 2026/27 monitoring years, and the final 7 dwellings to be delivered in the 2027/28 monitoring year.

5.28 Data on the issuing of Completion Notices by the Council confirms this build rate assumption. Between 1st April 2024 site visit to 31st March 2025 there were 33 completions.

- 5.29 A further site visit was therefore undertaken on 4th November 2025 which confirmed 55 plots were remaining. This evidence corroborates the NJL forecasted rate of delivery from the 2024 site visit and represents a more accurate assessment on progress being made on site.
- 5.30 Given the site visit evidence, the Council's assumption that 95 dwellings remained to be completed as of April 2025 represents a significant over-estimate and inaccurate assessment. For this to be accurate the developer (Tilia Homes) would need to have completed 40 dwellings in the past 6-7 months from April 2025 to November 2025 which demonstrably is not a feasible build rate based on this local housing market and rates previously achieved on this site.
- 5.31 It is asserted that only 67 dwellings should be allowed in the supply resulting in a deduction of **28 dwellings** from the Council's own assessment.

Land at Neddy Lane, Billington, Clitheroe (Council Ref: EV58)

- 5.32 Full planning permission (ref: 3/2021/0205) was granted in October 2022 for 36 dwellings with clear evidence of development having commenced on site. The Council suggest that the site remains to be completed with 17 dwellings to be completed within the next five years.
- 5.33 A site visit was undertaken on 30th May 2025 which confirmed there were in fact 11 plots which were yet to be completed. A single dwelling was observed as being sold with the remaining 25 dwellings occupied. My analysis includes the single dwelling as completed given that it has formally sold, however the Council have over-estimated the number of remaining completions to come forward over the next five years.
- 5.34 Accordingly, **6 dwellings** should be removed from the supply.

74 Higher Road and land to the rear, Longridge (Council ref: EV59)

- 5.35 Whilst a developer is attached to the site (Onward Homes) and a technical start on site has been made, there have been apparent delays since the grant of Reserved Matters approval in May 2022. Demolition and site preparation works are still required with evidence that the existing dwelling remains in-situ – this was again verified on the 4th November 2025 site visit.
- 5.36 The Council have failed to provide clear evidence to suggest that housing completions will come forward in the monitoring year 25/26. Allowing for a commencement of site

demolition, opening up and enabling works (12-month period) within the current monitoring year (i.e. by 31st March 2026) the earliest for the first housing completion will not be until 2027/28.

- 5.37 Allowing for a conservative build rate of 25dpa the site will deliver (at best) 75 dwellings over the five-year period resulting in a reduction of **47 dwellings** from the supply.

Other Completed Sites

- 5.38 The following sites have been included by the Council in deliverable supply despite evidence from a site visit undertaken on 30th May 2025 confirming that these developments have been fully built out. It therefore follows that they cannot be relied upon over the five-year period and should be removed:

- Spout Farm, Preston Road (2 dwellings);
- Land SW Barrow & West of Whalley Road, Barrow – Parcel B (2 dwellings); and
- Chipping Lane, Longridge – Phase 1, Longridge (5 dwellings).

- 5.39 Accordingly, a total of **9 dwellings** should be removed from the supply.

Small Windfall Sites

- 5.40 Paragraph 75 of the NPPF confirms that local authorities may apply a windfall allowance, but that there should be compelling evidence to show this as a reliable source of supply taking account of historic delivery rates and expected future trends.

- 5.41 Small sites completions are provided at Table 6 from the 2025 5YHLS:

Table 6: Past completions from small windfall sites (2015-2025)

Year	Total Dwellings	Small Site Dwellings
1 st April 2015 – 31 st March 2016	300	60
1 st April 2016 – 31 st March 2017	390	63
1 st April 2017 – 31 st March 2018	400	54
1 st April 2018 – 31 st March 2019	412	53
1 st April 2019 – 31 st March 2020	559	45
1 st April 2020 – 31 st March 2021	453	31
1 st April 2021 – 31 st March 2022	499	38
1 st April 2022 – 31 st March 2023	546	41
1 st April 2023 – 31 st March 2024	349	17
1 st April 2024 – 31 st March 2025	333	29
Total (2015-2025)	4241	431
Average per year (2015-2025)	424	43

		(215 allowance for 5YHLS)
NJL Total (2020-2025)	2180	156
NJL Average per year (2020-2025)	436	31.2 (156 allowance for 5YHLS)

- 5.42 The Council has provided no information that may inform expected future trends. Historic delivery evidence over the past ten years shows a declining trend in delivery of small sites over the past decade which was already occurring prior to the pandemic.
- 5.43 In accordance with Paragraph 75 of the NPPF, whilst there is evidence that small sites are a reliable source of supply there is no justification for the Council to rely upon a period that goes beyond the past five years.
- 5.44 There is limited identified supply in the Council's Brownfield Register with only two sites identified, with only one of those sites benefitting from planning consent which is for 5 dwellings (and would reasonably fall within the category of small sites allowance). The incremental nature of this does not alter my assumption on small site completions.
- 5.45 Accordingly, the figure of **156 dwellings** for the 5-year period is considered more realistic and reasonable at the current time.

6.0 The Five Year Housing Land Supply Position

- 6.1 There have been a number of relevant planning appeal decisions which have addressed the definition of 'deliverable' in the NPPF. These decisions have been considered to provide additional context for informing those sites which should be included within the five year housing land supply position.
- 6.2 Following the landmark decision at Woolpit³² it is made clear that the onus is on the Council to **provide** clear evidence of deliverability for category (b) sites.
- 6.3 It is important to note that since the adoption of the Core Strategy in 2014, RVBC have failed to undertake a review of the Local Plan against the backdrop of significant planning policy reform.
- 6.4 Separate to the calculation of 5YHLS, the Housing Delivery Test (HDT) represents a further policy measure implemented by Government to assess the annual measurement of housing delivery performance within local planning authorities. The PPG³³ states that where local authorities fail to deliver at least 85% of the housing requirement over the previous three-year period, a 20% buffer should be applied. If delivery exceeds this 85% level over the three-year period, a 5% buffer is appropriate.
- 6.5 In the case of Ribble Valley, the HDT identifies that there has been over delivery in the past three years. A 5% buffer has therefore been applied to the five-year requirement with the latest HDT result for 2023 summarised below in Table 7:

Table 7: Calculation of Ribble Valley's 2023 HDT Measurement

Period (Year)	RVBC Number of Dwellings Completed
2021/22	499
2022/23	546
2023/24	349
Total Completions 2021 - 2023	1,394
Housing Requirement 2021-2023	840
HDT Result %	165%

³² Appeal Ref: APP/W3520/W/18/3194926 - Land on east side of Green Road, Woolpit

³³ Paragraph: 034 Reference ID: 68-042-20241212

- 6.6 It is accepted by both parties that should the Inspector find that the allowance of oversupply of housing land is not permissible in this case, then regardless upon the assessment of deliverable supply, the Council are unable to demonstrate a five-year housing land supply.
- 6.7 It is only in a single, limited scenario where oversupply is allowed to be deducted from the forward LHN housing requirement, and an acceptance of the Council's deliverable supply, where RVBC can demonstrate a 5YHLS. Even then it is an incredibly marginal position at just 5.1 years (an exceedance of only 29 dwellings).
- 6.8 Table 8 provides a summary of the available scenarios on the basis of the outcome of consideration of appropriateness of oversupply in determining the appropriate housing requirement as well as the outcome of assumptions in relation to sites being delivered within the defined supply.

Table 8: Summary of Five-Year Housing Land Supply Calculation

Deliverable Supply	With 'Oversupply'		Without 'Oversupply'	
	Appellant 2025 -2030	RVBC 2025 -2030	Appellant 2025 -2030	RVBC 2025 -2030
C2 Permissions	76	76	76	76
Allocation Sites	107	177	107	177
Full Planning Sites	82	85	82	85
Outline Planning sites	0	41	0	41
Under Construction & Commenced	596	730	596	730
Small Sites	156	215	156	215
Deliverable Supply	1017	1324	1017	1324
Annual Requirement	259	259	311	311
Five Year Requirement	-	-	1555	1555
+ 5% buffer	1,295	1,295	1633	1633
5YHLS Position (Years)	3.9	5.1	3.1	4.1
Surplus/ shortfall	-278	29	-616	-309

- 6.9 This Statement has considered the full merits and implications for making an allowance on oversupply, as a means of suppressing future housing requirements in Section 4, having taken into account various appeal decisions, case law, and the wider context for housing delivery in Ribble Valley to inform our planning judgement. The Appellant's firm conclusion is that such an approach is wholly contrary to an interpretation of both national and local policy, is at odds with the national imperative of the planning system to significantly boost the supply of housing and would further undermine the delivery of market, affordable and older persons housing in Ribble Valley.
- 6.10 The Appellants' position is set out in Table 9 which is based upon our firm conclusion that the housing requirement for Ribble Valley is the local housing need figure.

Table 9: Summary on NJL Assessment of RVBC 5YHLS Position

	Housing Requirement	
A	RVBC Local Housing Need	311
B	Local Housing Need for 1st April 2021 to 31st March 2026	1,555
	Including Buffer	
C	5% Buffer based on Housing Delivery Performance [B*0.05]	78
D	Total Housing Requirement for 1st April 2021 to 31st March 2026 [B+C]	1,633
E	<u>Annual Housing Requirement [D / 5]</u>	<u>327</u>
	Housing Supply	
F	C2 Permissions	76
G	Site Allocations	107
H	Large sites with Full Permission (not yet commenced)	82
I	Large sites with Outline Permission	0
J	Large sites under construction/ commenced	596
K	Small sites windfall allowance	156
L	<u>Total Deliverable Supply</u>	<u>1,017</u>
M	Housing Land Supply Shortfall	-616
N	5YHLS Position (years)	3.1

- 6.11 Having scrutinised the Council's deliverable supply, it is concluded that the Council's five-year housing land supply position is **3.1 years**.
- 6.12 The matter of giving weight to the benefit of new housing development in reducing or overcoming a shortfall against the requirement for a five-year supply of housing land, remains one of planning judgement.

- 6.13 It is concluded that the magnitude of this shortfall and the associated benefits to the provision of new housing development, which would help to reduce the Council's shortfall in the five-year housing land supply, should be afforded **substantial weight**.

APPENDIX 2:

HIGHWAYS AND TRANSPORT APPENDIX TO THE STATEMENT OF CASE

Longsight Road, Langho

784-B075154

Highways and Transport Appendix to the Statement of Case

**In Respect of Outline Planning Application for up to 300
Residential Dwellings, Associated Access, Rail Station Car
Park, Green Infrastructure and Sustainable Drainage
Systems (all matters reserved except for access)**

At Land off Longsight Road, Langho

Date: 5th December 2025 | Tetra Tech Ref: 784-B075154

PINS Ref: **XX** | LPA Ref: 3/2025/0196

Revision 01

On behalf of Hallam Land Management Ltd



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1.0 Introduction

1.1 Preamble

- 1.1.1 This Highways and Transport Appendix to the Statement of Case (HTASoC) has been prepared by Peter Blair, Head of Transport North at the international consultancy Tetra Tech. It describes the Highways and Transport evidence, considerations and findings which will be developed more fully in the Highways and Transport Proof of Evidence (PoE).

1.2 Experience of Witness

- 1.2.1 My name is Peter Blair. I have a degree in Civil Engineering and a diploma in Industrial Studies, both from the University of Ulster. I am a Chartered Engineer, a Fellow of the Institution of Civil Engineers and a Fellow of the Chartered Institution of Highways and Transportation.
- 1.2.2 I am Head of Transport North at the international consultancy Tetra Tech (TT). I have over 35 years' experience of working in the field of traffic engineering, acting both for Public Authorities and Private Developers.
- 1.2.3 I am familiar with the development site and the highways and transport operational conditions in the local area.
- 1.2.4 This HTASoC is given in accordance with the requirements of my professional bodies. I can confirm that the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.

1.3 Appointment

- 1.3.1 I am instructed on behalf of Hallam Land Management Ltd, thereafter referred to as the appellant, to present evidence relating to Highways and Transportation matters in respect of the appeal, submitted pursuant to Section 78 of the Town and Country Planning Act 1990, concerning development of Land off Longsight Road, Langho ("the appeal site"). This evidence should be read in conjunction with the Planning Statement prepared by Mark Saunders and other statements prepared by the appellant.

1.4 Background to the Appeal

- 1.4.1 A full summary of the background to the appeal is set out within the appellant's planning Statement of Case (SoC).
- 1.4.2 The site consists of one large agricultural field at land off Longsight Road, Langho. The whole of the residential scheme is located within the administrative boundary of Ribble Valley Borough Council.
- 1.4.3 A comprehensive suite of technical reports and plans were submitted with the application in line with Ribble Valley Borough Council's validation requirements. The documents submitted during the course of the application will be scheduled in the Core Documents List. The highways and

transportation work which accompanied the application was undertaken by the consultancy Hydrock Fore (HF).

1.4.4 The full planning application for the site was received and validated and given the planning application reference 3/2025/0196. The case officer at the Local Planning Authority (LPA) prepared a report for the planning committee and recommended that the application should be refused.

1.4.5 This appeal follows the refusal by Ribble Valley Borough Council with regard to the application for planning permission for the following Proposed Development (“the appeal scheme”):

“In respect of outline planning application for up to 300 residential dwellings, associated access, rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access)”

Scope of Evidence

1.4.6 The consultancy HF produced the highways and transport information which accompanied the application. I have been appointed to provide a second opinion and in due course to present my evidence upon the proposals in order to enable the Inspector to consider the merits or otherwise of the transport and accessibility criticisms which arose in the application process.

1.4.7 I have read the planning documents, including the HF Transport Assessment (TA), the Framework Travel Plan (FTP), the Highway Authority (HA) consultation responses, the case officer’s report to committee and the decision notice. I have undertaken a site visit and have commissioned various traffic and pedestrian surveys in the area, to further inform my considerations.

1.4.8 Reason for Refusal (RfR) no. 2 cited reliance on the private motor vehicle as being contrary to local and national policy. The case officer report to committee (para 5.6.7 and 5.6.8) cites concerns over the accessibility and connectivity of the site and the lack of an accessible route to the train station, concluding that the matter of sustainability of the site has not been addressed. Consultee and public representations include concerns over the adequacy of bus services, safety of the site access onto the A59, the proposed use of Whitehalgh Lane, traffic impact on the A59 and the steps on the direct pedestrian route to the main centre.

1.4.9 This HTASoC describes how I will address those points. My evidence to the Appeal Inquiry will also address any other highways and transportation related points as may be raised by the Inspector at the Case Management Meeting (CMC).

1.4.10 Lancashire County Council (LCC) are the HA and offered no objection, subject to conditions and S106 contributions which include significant sustainable travel mitigation.

1.4.11 The only transportation points between the appellant and the LPA appear to be whether or not the proposals constitute sustainable development and accessibility for the mobility impaired.

1.4.12 My evidence will refer to any Statements of Common Ground (SoCG) to identify the points either where the parties have reached agreement or where points of contention have been isolated.

2.0 Review of Submitted Information and Additional Tetra Tech Information

2.1 Introduction

2.1.1 In approaching this case I am mindful that the applicant has submitted a TA and an FTP (prepared by HF) and that the HA was consulted through the process and is satisfied with the proposals. Nevertheless, I have sought to cross check that information and collect additional data to help inform my considerations. There are several reasons for doing that:

- To seek to validate the previous findings;
- To establish whether previous assessments or findings could be considered to be over robust. If that is the case, it should give latitude for the LPA to weigh the proposals more favourably;
- To establish whether previous submissions understate impacts or issues. If that is the case that would inform where additional analyses or mitigation might be required.

2.1.2 The details of my cross checking and investigations are as set out in the following sections.

2.2 Traffic Counts and Speeds

2.2.1 The HF TA presented traffic volumes and speeds recorded along the A59 in October 2024. Figures 9 & 10 of the TA (see **HTASoC Appendix 1**) show the surveyed traffic volumes which include the recorded traffic figures along the A59 in the AM and PM peak hours. This speed limit of this part of the A59 is the national speed limit, which for this class of road is 60mph.

2.2.2 I commissioned a traffic survey between 4th and 10th September 2025 to collect classified traffic volumes and speeds (see **HTASoC Appendix 2**). Whilst the September survey was just after the school holiday period, and so volumes may be slightly lower in the commuting peaks, lower volumes may mean higher speeds. The comparison between traffic volumes and speeds in the TA and in my work is tabulated below.

2.2.3 **Table 2.1** presents the comparison between the 2024 and 2025 Surveys. It includes weekday peak hour traffic volumes and 85th percentile traffic speeds over a 7-day period.

Table 2.1 Traffic Volume and Speed Comparison in the Peak hours

Direction of Travel	2024 Traffic Survey Data (extracted from HF TA)			2025 Traffic Survey Data		
	AM Traffic Flow	PM Traffic Flow	85 th Percentile Speed	AM Traffic Flow	PM Traffic Flow	85 th Percentile Speed
Eastbound	644	751	52.1mph	649	623	52.2mph
Westbound	754	590	54.3mph	651	635	51.3mph

2.2.4 The PM peak hour varies between the two records. In the 2024 survey the PM peak hour was from 16:30 to 17:30 but in my survey it was between 16:00 to 17:00.

- 2.2.5 The traffic volume during the AM peak hour eastbound is almost identical in both surveys. The AM westbound and PM eastbound were recorded to be c. 100-125 trips higher in 2024 than 2025, whilst the PM westbound was higher in 2025 by 45 vehicles. In summary, the volumes are very similar.
- 2.2.6 The traffic speeds from the two surveys were very similar. In the eastbound direction they were almost identical and in the westbound direction the more recent survey records slightly slower speeds.
- 2.2.7 The higher 2024 volumes were the basis for the peak hour junction operational assessment of the site access junction. That assessment forecast that the site access would operate with at least 47% spare capacity and with no material queues in the AM and PM peak hours (TA Table 7 page 16). Given that the volumes have not changed significantly between 2024 and 2025, it is considered that the junction modelling in the TA was carried out on a sound and up to date data source.
- 2.2.8 The exercise essentially cross checks and validates the traffic volumes and speeds presented in the TA.
- 2.2.9 The proposals would also seek to introduce a speed limit reduction to 40mph along the site frontage, which should result in a significant reduction in speeds. The visibility splays which are required at the junction are 120m, commensurate with DMRB standards for 40mph. The actual visibility splays which will exist will exceed the distances which are required for the existing 85th percentile speeds. In that way the junction layout and splays are appropriate, whether the LHA decide to reduce vehicle speeds or not.

2.3 Trip Generation

- 2.3.1 I have seen that LCC requested significantly higher trip generation rates for the proposals than those which HF first proposed in the scoping phase. I have undertaken an independent trip rate derivation and find that my figures align more closely with the original HF rates. The HF assessments adopted the higher rates requested by LCC in their TA.
- 2.3.2 The difference is perhaps a moot point because all of the junctions which were assessed in the HF TA were forecast to operating well within capacity at peak times even under the higher LCC trip rates. As an aside, in checking the HF analyses I note that the traffic volume inputs to the model have been made in “Passenger Car Units”, PCU. That approach factors up HGV numbers to an equivalent higher number of cars. That is the reason why the assessment output files record a “warning” that no HGV traffic has been modelled. It has taken account of HGV traffic, just by an alternative and accepted methodology.
- 2.3.3 My conclusion is that the HF work is sound, albeit that the proposals are likely to generate fewer traffic movements than have been assessed. Consequently, the access junction and local network will operate better than the submitted assessments forecast. The HF and LCC finding that the development is acceptable on highways impact terms is therefore robust.

2.4 Pedestrian Survey

- 2.4.1 I have collected additional data in the form of pedestrian surveys in the area where the PROW crosses the A59 (see **HTASoC Appendix 3**). That was intended to gauge the number of existing

pedestrians along the footway on the A59 site frontage, where that frontage is being improved and speeds are to be reduced.

- 2.4.2 The survey was conducted by video, over a Thursday and a Saturday in early September 2025, between 6am and 8pm, which at that time of year, approximates to the hours of daylight.
- 2.4.3 The recorded pedestrian volumes were 43 movements on the Thursday and 45 movements on the Saturday including walkers, joggers and dog walkers. The actual number of individuals was lower (34 on Thursday, 42 on Saturday) as the video showed that some people passed the site more than once within those totals.
- 2.4.4 That data is relevant to quantifying how many existing pedestrians will experience the different views and the footway, crossings and traffic speed improvements along the site frontage.

2.5 Access

- 2.5.1 The proposals feature a new site access junction onto the A59 with a 3m wide footway/cycleway on both sides of the A59. The proposals include a speed limit reduction to 40mph, a crossing of the site road, two uncontrolled crossing points on the A59 and a signalised toucan crossing on the A59. That crossing also serves two new bus stops. The access junction has been designed to accommodate the turning movements of pantechicon and a refuse vehicle as demonstrated by vehicle tracking in the HF TA.
- 2.5.2 The pedestrian survey recorded 44 pedestrian movements per day, each of which currently experiences the A59 environment where 85th %ile traffic speeds are around 52mph, no footway is present on the south side where the PRoW emerges, and the footway on the north side is a little overgrown, with approximately a 1.3m useable width. The proposals will be capable in geometric and capacity terms, and will introduce measures to encourage active travel and will improve the pedestrian and cycling environment.
- 2.5.3 As the survey demonstrates, the footway alongside the A59 is presently actively used.
- 2.5.4 The proposals also include a new pedestrian and cycle access onto Whitehalgh Lane accompanied by a speed limit reduction to 30mph and associated lighting and traffic calming measures. For reasons that I explain below – the proposals do not actively encourage pedestrian use of Whitehalgh Road – but there is a recognition that it is already in use by pedestrians and may be used by future residents – so improving this route is appropriate.
- 2.5.5 At paragraph 5.6.1 of the case officer report to committee, under the headings of ‘Assessment of Proposed Development’ and ‘Highway Safety and Access’, the case officer records that the HA are satisfied on access and that the LPA consider the proposals create safe and suitable access.

2.6 Rail Station Car Parking Availability

- 2.6.1 I have also commissioned observations at and around the 4 nearest rail stations. That survey data is presented in **HTASoC Appendix 4**. The purpose of those observations was to determine whether parking is available in those locations at times when commuters or persons undertaking late morning journeys are likely to need it. One survey was undertaken in the school half term week and a further survey was undertaken in the week commencing 10th November.

- 2.6.2 In order to quantify the likely present-day demand for parking, surveys were undertaken at Clitheroe, Whalley, Ramsgreave and Wilpshire and Langho rail stations.
- 2.6.3 The finding that there is a lack of parking availability means that persons who might otherwise use the train will be deterred from doing so. Moreover, there is no scope to achieve benefits from future looking, Vision led strategies to promote mode shift from car to rail.
- 2.6.4 The finding that there is an absence of accessible parking spaces and Electric Vehicle charging infrastructure near the rail stations means that any vehicle drivers who require those, will be deterred from using the existing stations. There is no dedicated parking at Langho rail station at all.
- 2.6.5 The conclusions from the survey work are that a new car park at Langho would :
- a) Accommodate the existing demand for rail users parking their vehicle in Langho and using the railway (promote and enable public transport);
 - b) Accommodate any parking demand currently being displaced to other less convenient rail stations (reduce mileage);
 - c) Accommodate any rail journey related parking demand, which is currently being suppressed by the lack of parking availability across the rail stations (enable and facilitate rail use);
 - d) Create a Vision Lead facility which will accommodate future parking demand arising from mode shift towards rail as promoted by future initiatives and strategies (accommodate future increasing demand for rail use);
 - e) Provide facilities for blue badge holders and Electric Vehicle charging, to overcome the lack of those facilities at other stations, which precludes rail travel for those who need those facilities.
- 2.6.6 The provision of a 40 space car park will not increase the number of journeys which need to be made. It will however serve to encourage the use of rail for part of those journeys. In doing so it will encourage mode shift and promote sustainable travel, an objective of the NPPF. It will achieve that straight away in terms of serving existing and suppressed existing demands. It will also serve as advance provision to support the success of other initiatives and strategies which aspire to increase rail travel.
- 2.6.7 The proposed car park achieves objectives within the NPPF and the draft Lancashire Local Transport Plan such as improving accessibility to and promoting public transport and providing for efficient onward public transport movements which are safe and convenient.

2.7 Summary of Review of Submitted Information and more Recent Information

- 2.7.1 My review of the highways and transport work submitted with the application concludes that it is sound. New additional data validates that work and shows that the assessments of operational conditions are robust.
- 2.7.2 New pedestrian and rail station parking data quantifies the extents to which the proposals would benefit existing pedestrians, and would promote and accommodate demand for rail travel.

3.0 Review of the Proposals against the Requirements of Local Policy and the NPPF

3.1 Introduction

3.1.1 In preparing this HTASoC, I have reviewed the policies cited in the RfR2 and also the key policies within the NPPF.

3.1.2 For ease of cross reference, RfR2 stated:

“The proposed development by virtue of the quantum of development, would result in a large-scale development in a rural location resulting in future users being reliant on a private motor vehicle contrary to Key Statement DM12 and Policies DMG1 and DMG3 of the Ribble Valley Core Strategy and the National Planning Policy Framework which supports sustainable patterns of development.”

3.2 Compliance with Policy

3.2.1 My full PoE will elaborate further on how the proposals comply with the policies cited in RfR2 and in the NPPF. In the interests of brevity in this HTASoC, I have tabulated those policies and cross referenced them against various elements of the proposals to demonstrate how the proposals comply. I present those tables as **HTASoC Appendix 5**.

3.3 Sustainable Travel Improvements

3.3.1 A significant part of the comparison described above requires a consideration of the sustainable travel enhancements offered by the proposal. The TA and TP identify 18 sustainable travel improvements and 16 sustainable travel measures / funding. I set those out in **HTASoC Appendix 6**. Many of those also benefit wider accessibility and inform my considerations on the subject of sustainability

3.3.2 Whilst this section of the HTASoC presents these measures to demonstrate compliance with policy they should also be noted in terms of addressing the comments in the Officers Report to Committee and RfR2 where the issue of sustainability is questioned.

3.4 Interpretation of Policy and Definitions

3.4.1 When cross referencing the policy tables against the sustainable travel improvement matrix, it should be clear how the various elements of the proposals assist compliance with the key policies. I consider however that an understanding of what policy and guidance actually do and do not require, results in an even clearer demonstration of compliance.

3.4.2 Considerations of what constitutes sustainable development often recognise that there are 3 strands to sustainability, which are social, economic and environmental. Travel is directly related to the environmental strand, but it is also linked to the social strand. The point to make is that travel is just one strand in the consideration of whether a development is sustainable. It is therefore not correct to regard an alleged reliance on the private car as something which automatically renders a development unsustainable. In the case of this development, and as later

sections show, the development is sustainable and enhances sustainable accessibility for non-development persons too.

- 3.4.3 The Glossary of NPPF defines sustainable modes of travel to include ultra low / zero emission cars. Those are a rapidly increasing proportion of the UK car fleet. Car sharing has long been regarded as a sustainable form of travel, and is also encouraged as such in Travel Plans. It is not therefore correct to regard all car travel as unsustainable nor an alleged “reliance on the private car” as something which renders a development unsustainable. Electric and hybrid vehicles should not be treated as being unsustainable in principle.
- 3.4.4 There is no policy that requires all forms of access to be available to all services, for all people, via the most direct route.
- 3.4.5 There is no policy requirement to provide access to every facility by all modes of travel.
- 3.4.6 The case officer has classified the proposals as being located in a rural area. If that is taken to be the case, then the NPPF requires that planning decisions should recognise that developments in rural areas are likely to exhibit fewer opportunities for sustainable accessibility. In fact the better way of characterising the proposal is an extension of a modestly sized settlement located in a rural area – which benefits from a typical range of non-car modes for such a settlement – but has the additional benefits of being close the A59 which is a major public transport corridor for buses travelling between Preston and Clitheroe; as well as the above-discussed rail station.
- 3.4.7 In undertaking this review, I have however noted a mis-application of policy. Policy DMG3 requires that “considerable weight” should be given to many positive aspects of the proposals. However, it would appear that weight has not been afforded in the case officer’s assessment.

3.5 Summary

- 3.5.1 My evidence will conclude that:
- the proposals are not contrary to the cited local policies, nor to the NPPF,
 - the proposals in fact comply with, and positively deliver the requirements of those policies,
 - Had proper weight been given to positive aspects of the proposals as required by policy DMG3, that could only serve to affect the planning balance positively in favour of the proposals.

4.0 Addressing the key points in the Reason for Refusal 2 and the ORC

4.1 Introduction

4.1.1 The key points which have been raised against the proposals are that the site is inadequately accessible, that future residents will be reliant on the private car and that the proposals are therefore contrary to policy which supports sustainable patterns of development.

4.1.2 These are cited in RfR2 which states:

“The proposed development by virtue of the quantum of development, would result in a large-scale development in a rural location resulting in future users being reliant on a private motor vehicle contrary to Key Statement DM12 and Policies DMG1 and DMG3 of the Ribble Valley Core Strategy and the National Planning Policy Framework which supports sustainable patterns of development.

4.1.3 Chapters in my evidence will therefore review the proposals in relation to the topics of accessibility, reliance on the private car and sustainable development. At the outset, there are a few overarching points to make in relation to the wording of RfR2.

4.1.4 I note that the case officer considers this to be a rural location which if correct would mean that the dispensations afforded to rural development by the NPPF apply, notably paragraphs 89 and 110. As noted above I consider that the better description is that Langho is a settlement located in a rural area, and my view is that the development would readily comply with the policies if it was considered to be part of a town or village. If the location were to be assessed as being a rural area, then the proposals would comfortably outperform the expectations for such a location.

- The RfR equates a rural location to a reliance on a private car and then a reliance on a private car to a failure to comply with policies promoting sustainable patterns of development. Both of those suppositions are incorrect, principally around the concept and definitions of reliance and sustainable development.
- Residents will have a choice of how to access facilities or services so they will not be “reliant” on a private car.
- Even when some residents do chose to use a car, if that car is used by more than one person, then by the definition of sustainable travel in the glossary to the NPPF, such a journey would be a sustainable form of travel. Similarly, ultra-low emission and zero emission vehicles are becoming increasingly common as part of the national vehicle fleet and are also defined by the NPPF as sustainable forms of travel. Some use of a private car (never mind reliance on a private car) does not therefore necessarily equate to a development which is inherently unsustainable. Even ambitious government and authority strategies generally hold that 50% of all travel will still be by private vehicle by 2040, by which time the expectation is that a substantial proportion of the national vehicle fleet will be electric.
- Reliance means being dependent upon. Both active travel and sustainable travel options together with ever-increasing on-line accessibility options, combine to ensure that residents will not be “reliant” on an unsustainable private motor vehicle. Moreover, when some

residents choose to travel by private vehicle, those which are zero or ultra-low emission or used for conveying more than one person are sustainable modes of travel.

- On a perhaps a pedantic point in relation to the RfR, reliance on private motor vehicles is not actually prohibited by any of the cited policies. It is both incorrect to have stated that users will be reliant on the private car and that such reliance is contrary to policy.

4.2 Considerations on the Topic of Accessibility and Sustainable Development

- 4.2.1 My full Proof of Evidence will describe various highways and transportation aspects of sustainability and accessibility and will specifically deal with accessibility for the mobility impaired. I note that the HA consultation response 9th May 2025 stated:

“Subject to the mitigation measures identified above being implemented we consider that residents have the option to travel sustainably between the site, local facilities and employment centres and hence the proposals are suitably accessible”. I concur.

- 4.2.2 When considering accessibility and sustainable travel, (leaving aside for now, the various modes of travel), it is helpful to consider accessibility in four categories:

- on site,
- at the interface between the site and the external networks,
- onward to facilities and services and
- to services and facilities which does not require travel at all.

- 4.2.3 I have tabulated the various provisions of the proposals, set against the first three of those categories, cross referenced with travel mode and objectives achieved (see **HTASoC Appendix 6**).

Accessibility On-Site

- 4.2.4 As far as the site layout is concerned, the planning application is in outline. It can be ensured at detailed planning stage that the site will be laid out to modern standards, putting pedestrians and cyclists to the fore. It should therefore be assumed, that the Site will be delivered with an accessible internal layout, in line with the requirements of paragraph 115 of the NPPF and my statement focuses upon the accessibility of facilities beyond the site. The site layout will also meet the requirements of paragraph 117 of the NPPF.

Access at the interface between the site and the external networks

- 4.2.5 A second aspect of site accessibility is the nature of the accesses to the site and the modes of travel which they can support. The site will have 4 access points, and potentially 5 depending upon the legal status of the route through the 2018 Pringle development to the east. Where the Pringle site adjoins the application site, a sign has been erected saying “Private”, but has been crossed out. Prior to that sign being erected, I note that the developer in promoting the application stated that the footway on their site would connect through from the railway underpass to the A59, with no suggestion that this would only be to the benefit of residents of that development. The planning officer report describes an expectation that the play area on that site should be available to the general public. Both of those clearly indicate that a benefit of that approval was intended to be

that people could walk through that site. In highway terms that would appear to be an intention on the part of the landowner to dedicate this route as a right of way – but this may need to be the subject of legal submissions if required.

- 4.2.6 That is perhaps something of an aside, because the site promotes 4 other accesses. Enhancements will be made to FP6a at its connection to the railway underpass. As a footpath it can only accommodate pedestrians.
- 4.2.7 A new pedestrian and cycle access is proposed onto Whitehalgh Lane, accompanied with speed reduction and traffic calming measures.
- 4.2.8 A new vehicular access (the main site access), framed with pedestrian and cycle infrastructure will be provided onto the A59. That is also accompanied by a speed reduction measures on the A59, footways and cycleways, uncontrolled crossings and a signalised toucan crossing and two new bus stops to Quality Bus Standards.
- 4.2.9 It is also proposed to improve the existing access where FP6a emerges onto the A59. At this location pedestrians will benefit from the measures proposed along and across the A59.
- 4.2.10 There is no policy requirement to provide access in every direction to all types of users, just that the site should be accessible. The provision and enhancement of facilities at 4 and possibly 5 access locations, benefiting pedestrians, cyclists, public transport users, the mobility impaired and motorists is a clear demonstration that the site would be accessible to the surrounding networks.

Accessibility to Services and Facilities

- 4.2.11 The TA Figure 2 shows facilities in Langho. **HTASoC Appendix 7** shows the typical walk distances from the centre of the site to the crossroads of Whalley Road and Whinney Lane, which could be taken as the effective centre of Langho. The shortest distance is via the lit railway underpass and that route also involves a flight of steps which I acknowledge would not accommodate all mobility impaired users, notably those using mobility scooters or wheelchairs, but for the remainder of the population would be a short and convenient route to a rail station and the town.
- 4.2.12 As to those with mobility impairment, Community Rail Lancashire has developed options to provide lift access to the platforms, and those options would also allow the steps to be bypassed on a route to the town centre. Reference Option Selection Report, September 2020. The applicant cannot control the delivery or long-term maintaining of such infrastructure which will be in the hands of Network Rail and so does not rely upon it.
- 4.2.13 Although the steps would not accommodate wheelchair or mobility scooter use, they do offer features to support the mobility impaired. The 19 steps typically have tread width of 300mm, a rise of just 110mm and are punctuated by two landings 1.7 and 2.1m long. The steps have a handrail for the first 6 step flight and two handrails for the two higher flights.
- 4.2.14 For those who can negotiate the steps, FP6a is the most direct route into Langho on foot. For anyone who cannot, the alternative routes, shown on **HTASoC Appendix 7** offer safe and reasonable options. In addition to referencing guidance on preferred maximum walk distances, my Proof will present published research on how far people actually do walk to services. There is no policy that requires access to be available to all services to all people via the most direct route.

To the contrary, an overall view has to be formed as to the quality of the opportunities for sustainable travel which will be available to future residents.

- 4.2.15 I note the views of Objectors who cite the lack of services and facilities in Langho and who contend that other nearby settlements have a wider range of services. Furthermore, it is correct to say that accessing the main centre of Langho by the alternative routes would involve travelling up slopes. Again, there is no policy which prevents further development in towns which are on hills.
- 4.2.16 If some residents of the development find that they cannot access services in Langho or that the services which they wish to access do not exist in Langho, then they still have reasonable sustainable travel options by which to access those services.
- 4.2.17 The Office for National Statistics, ONS classifies Langho as “Rural Accessible”, and that designation considers various aspects of how services can be reached, often citing a reasonable drive time. Again, it is pertinent to note that many forms of car travel are classed as sustainable modes of travel. I have mentioned how ultra-low and zero emission cars are sustainable modes, but so are multi occupancy car journeys, such as would be the case if a carer accompanied a mobility impaired person to an appointment by car.
- 4.2.18 A key fact which makes accessing services and facilities from this site a realistic option, is that there are several towns near-by where those services and facilities can be found. Clitheroe, Whalley, Blackburn are sizeable towns and can be reached within a short drive or bus journey, noting that the A59 is a major bus corridor linking Clitheroe and Preston.
- 4.2.19 I have reviewed the bus timetables and find that there are regular services to those locations. The proposals further promote bus travel by providing new bus stops, signalised crossing and public transport funding.
- 4.2.20 I have also seen Objectors comments pointing out that many services are school only. That is noted, but such services are still a sustainable travel mode providing access to those schools for the many people who use them, and they reduce the incentive upon parents to use the private car for the school run.
- 4.2.21 The proposals also benefit from being directly adjacent to a rail station. The current limitations to accessing the platforms for some mobility impaired users are noted, as is the fact that Network Rail have explored options to specifically address that. As can be seen from **HTASoC Appendix 8**, rail services are regular. I have seen objector comments stating that it is quicker to drive to Manchester than take the train. That may be so outside of rush hour, but not during the time of peak demand when principal arterial routes into Manchester are heavily congested.
- 4.2.22 The point to make however is that the rail services abutting the site are an additional travel option which is not available to most developments (nor indeed in many towns). The limitations in services and access to them are not negatives against the proposals, they exist, and should be regarded as additional positives. Furthermore, the rail station provides a direct service to a range of locations with large scale commercial and employment opportunities, such as Bolton, Salford, Clitheroe and Blackburn.
- 4.2.23 The proposals further seek to promote the future use of rail facilities by providing a car park which will be available to the wider public. As set out in section 2, that encourages public transport,

reduces mileage, provides facilities for disabled parking and EV charging and releases demand for rail travel which is being suppressed by lack of parking facilities in Langho and at other near-by stations, both now and in the future.

- 4.2.24 A key thread of the planning system is for development proposals to be vision led. No development can provide every aspect necessary to deliver the sustainable travel future for the north west of England, but the proposals do provide infrastructure which directly supports that Vision.
- 4.2.25 In terms of promoting the use of sustainable modes, the proposals promote rail, bus, walking, cycling, and sustainable car travel, through providing infrastructure, funding and implementing a Travel Plan.
- 4.2.26 I appreciate that whilst policy says all modes of travel, few developments if any are served by all modes of travel so I take that requirement to mean by walking cycling, public transport and car (and not to also require air, sea, canal, etc). The important issue is that the site will be served by a realistic range of sustainable travel modes which offer travel choice and will discourage the use of the private car.
- 4.2.27 Residents of the site will be able to physically access services and facilities. The site is not remote, and it certainly isn't isolated. The site and the proposals exhibit adequate to good accessibility across the 3 categories of on-site provision, access interface with the external networks and onward accessibility to services and facilities. Accessibility and accessibility enhancements are provided in respect of walking, cycling, bus, rail and sustainable car modes of travel, through infrastructure, funding and the implementation of a Travel Plan.

Online Accessibility

- 4.2.28 A final point to make on accessibility relates to the increasing and very significant trend to access services, facilities, work and maintain social contact on-line. Many people choose to work from home and access facilities such as shopping, medical appointments, chemist prescriptions, news, literature, entertainment (such as movies) and social interactions on-line.
- 4.2.29 That has significantly reduced the need to travel and the potential for isolation.
- 4.2.30 As a modern development, the homes will feature modern broadband connectivity.
- 4.2.31 **HTASoC Appendix 9** presents statistics gleaned on the subject.
- 4.2.32 Physical accessibility to services and facilities (particularly the workplace) is important, but being able to have on-line access to most aspects of life, where travel was traditionally necessary, has significantly reduced isolation.
- 4.2.33 On-line access presents a great accessibility benefit and a further accessibility choice. In a vision-led planning system and with Government and Local Authority strategies seeking to reduce vehicular travel, that trend is likely to increase.

4.3 Sustainable Pattern of Development

- 4.3.1 The reason for refusal refers to sustainable patterns of development. Considerations of what constitutes sustainable development often recognize that there are 3 strands, social, economic and environmental. The matters of traffic and sustainable travel are directly related to the

environmental strand but are also linked to the social strand. I do not comment on the economic strand other than to observe that the site is located in a populous and prosperous part of county and that the applicants, in promoting the proposals will have satisfied themselves on the question of economic viability. Objectors have noted the limited services available in Langho and the additional spending which the development would bring would surely enhance the viability of those existing businesses.

- 4.3.2 The sustainable travel opportunities, infrastructure enhancements and funding to promote public transport and Travel Plan implementation address the travel related criteria of sustainable development under the environmental strand.
- 4.3.3 Travel and access to services and facilities can also be linked to the social strand of sustainability. The site is located adjacent to other houses, close to the village centre and in an area which has good connections to a number of villages and significantly large towns. Those towns and villages offer significant services and facilities, (including rail services) and a significant number of workplaces, all well within an acceptable commuting travel distance. Bus services pass the site and the pedestrian survey shows that the A59 is frequented by walkers and joggers.
- 4.3.4 The residents of the site will have access to modern broadband and telecommunication connections and the social engagements which those offer. It would be unthinkable that residents of the proposed site would regard their situation as being isolated or locationally unsustainable from a social perspective. To the contrary – the site lies within an easy bus ride or train trip to major centres of employment and higher order centres. For example, Clitheroe is 20 minutes away by bus, with the employment at Barrow being around 10 minutes. Bae Salmsbury, a major local employer and the heart of a designated Enterprise Zone lies 10 minutes by bus to the West, and is slated to be the future National Anti-Cybercrime Centre.

4.4 Summary

- 4.4.1 My main proof of evidence will demonstrate that in respect of the highways and transport aspects of development, the proposals are suitably accessible and comply with policy.
- 4.4.2 No development provides accessibility by every mode to every resident to every facility in every direction. Para 117.b recommends that proposals should address needs of people with reduced mobility in relation to all modes of travel. The proposals will provide adequate parking for those mobility impaired residents who drive. They provide a Toucan crossing to assist crossing the A59, new Quality Bus stops on A59, 2 upgraded on Whalley Road, new cycle facilities, new pedestrian / cycle access and improvements to the A59 footways which lead via Northcote Road to Langho.
- 4.4.3 The proposed site layout, the connections to the adjacent network and the opportunities for onward travel to services and facilities, all present realistic choices of sustainable travel modes. The proposals deliver infrastructure and funding to promote safe and suitable access, active travel, public transport and travel planning.
- 4.4.4 The proposals satisfy the travel related components of sustainable development.
- 4.4.5 The proposals comply with local and national policy and guidance. The due weight which local policy requires should be given to the beneficial transportation aspects of the proposals in the planning balance was not in fact, given.

5.0 Summary and Conclusion

5.1 Summary

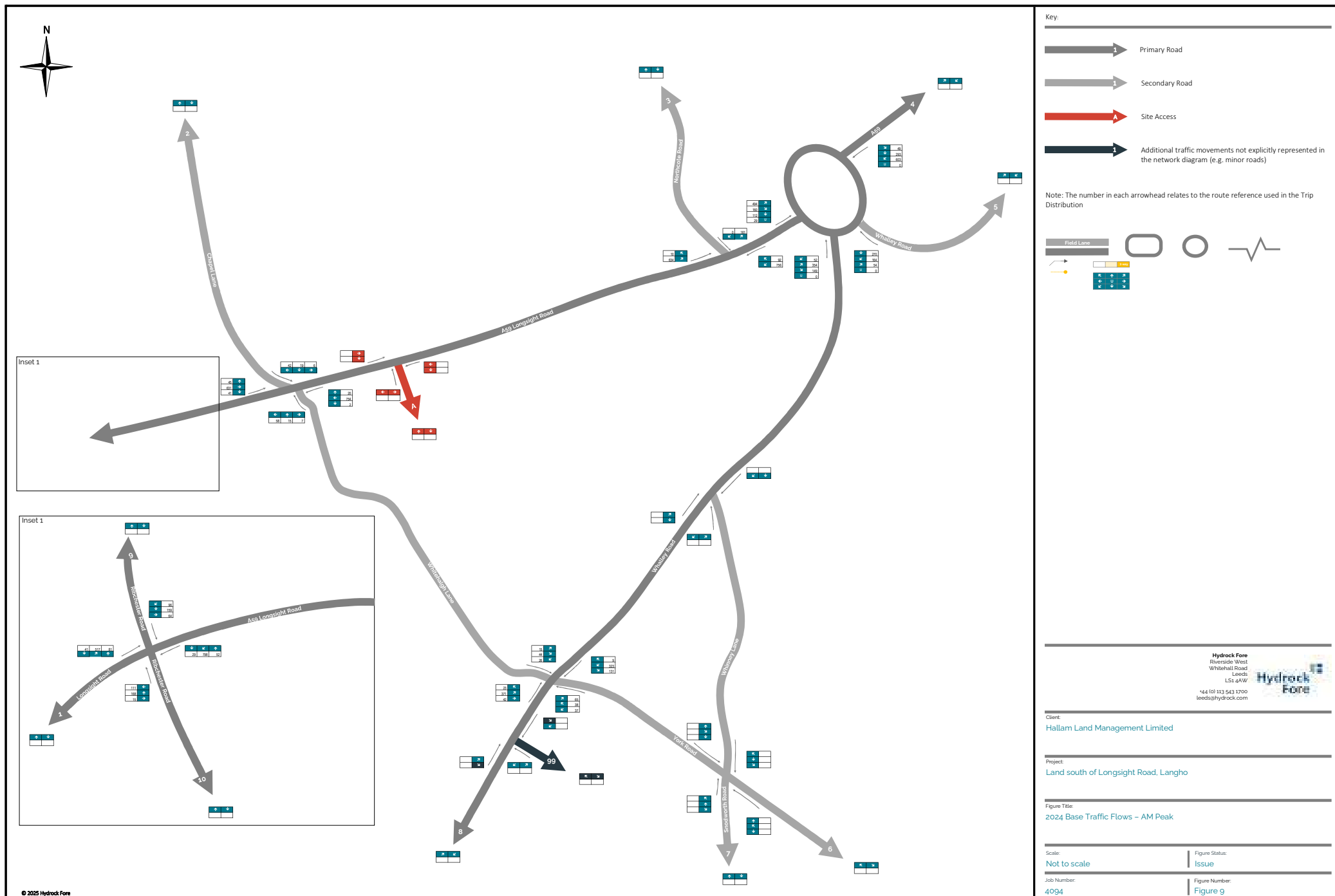
- 5.1.1 In approaching this project, in relation to highways, traffic, transportation and accessibility issues, I have :
- Checked the transportation work submitted alongside the application;
 - Undertaken further investigations and updates to data;
 - Found that the previous work which supported the application is sound and robust;
 - Reviewed the Officer Report to Committee and its findings;
 - Reviewed the points made by objectors to the application;
 - Reviewed the proposals against the requirements of local policy and the NPPF.
 - Considered the attributes of the proposals in terms of Sustainable development and accessibility.
- 5.1.2 I have also noted that the HA were in agreement with the original work and do not object to the proposals;
- 5.1.3 The Case Officer Report to Committee (para 5.6.7 and 5.6.8) cites concerns over the accessibility and connectivity of the site and the lack of an accessible route to the train station, concluding that the matter of sustainability of the proposals has not been addressed.
- 5.1.4 My investigations have found that traffic volumes, trip generations and traffic speeds are all slightly lower than forecast in the HF work. This is further evidence that the HF work was robust and reinforces the views of the HA, who raise no objection.
- 5.1.5 I have demonstrated that residents of the site will enjoy a good choice of sustainable travel options, providing accessibility to facilities. Moreover, key facilities and services are ever more frequently accessed on-line. Both aspects combine to ensure that residents will not be reliant on the private car. I have also given examples to show how even when residents do use the private car, many types of car trips count as sustainable travel. It is incorrect to cite reliance on the private car and that such reliance would somehow render the development unsustainable.
- 5.1.6 No development can fix every accessibility shortcoming across the wider area, but the proposals are vision led, delivering development which is future ready to integrate with wider initiatives and strategies.
- 5.1.7 The proposals are not contrary to the cited local policies, nor to the NPPF, in fact they comply with, and positively deliver the requirements of those policies
- 5.1.8 Had proper weight been given to the many positive aspects of the proposals, as required by policy DMG3, that could only have served to affect the planning balance positively in favour of the proposals.

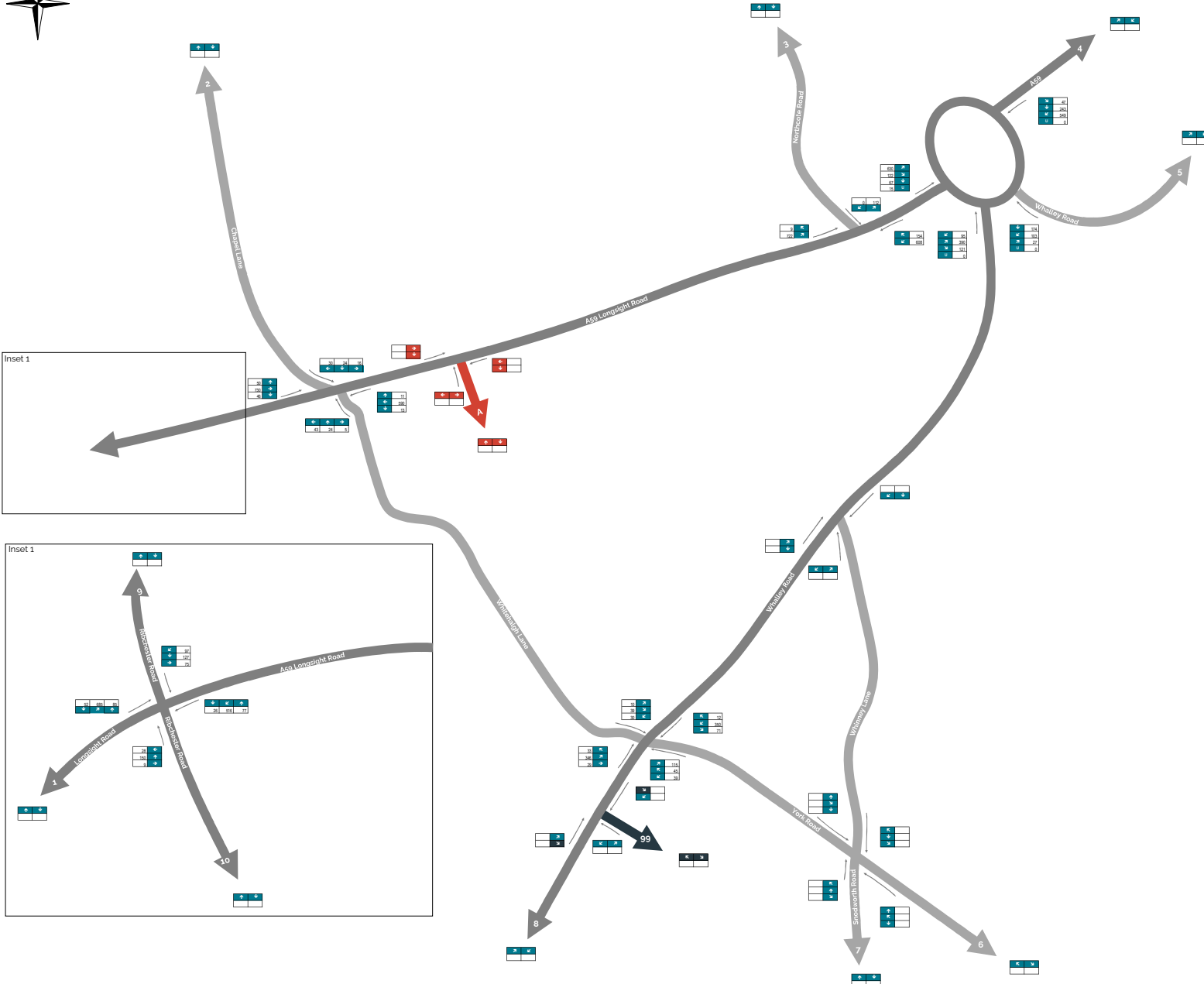
5.2 Conclusions

- 5.2.1 Prior to completing my main Proof of Evidence, the evidence so far supports the following conclusions:
- The proposals have a safe and suitable access for all modes of travel.
 - The site is in a rural location and so reduced opportunities for sustainable accessibility should be taken into account when planning decisions are made. In fact the site offers good accessibility both on site, connecting to adjacent networks and via sustainable travel modes to a significant number of facilities, services and towns.
 - The proposals will not have any significant traffic impacts on the local highway network.
 - The residual cumulative impacts on the road network will not be severe.
 - The transport and highways aspects of the proposals support sustainable development and promote and prioritise sustainable travel
 - The proposals comply with local and national policy and guidance.
- 5.2.2 The development proposals should be considered to be acceptable in highways, traffic and transportation terms.

Appendices

HTASoC Appendix 1: Hydrock Fore Transport Assessment - Figures 9 & 10





Key:

- Primary Road
- Secondary Road
- Site Access
- Additional traffic movements not explicitly represented in the network diagram (e.g. minor roads)

Note: The number in each arrowhead relates to the route reference used in the Trip Distribution



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Client:
Hallam Land Management Limited

Project:
Land south of Longsight Road, Langho

Figure Title:
2024 Base Traffic Flows - PM Peak

Scale: Not to scale	Figure Status: Issue
Job Number: 4094	Figure Number: Figure 10

HTASoC Appendix 2: September 2025 Traffic Count Raw Data

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

04/09/2025	Vehicle Classes														
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL	
1	17	1	0	0	0	0	0	0	0	0	2	0	0	20	
2	6	7	0	0	1	0	0	0	1	0	2	0	0	17	
3	11	2	0	0	0	0	0	0	2	0	1	0	0	16	
4	7	6	0	0	2	0	1	1	0	0	3	0	0	20	
5	27	6	1	0	0	0	0	0	2	0	4	0	0	40	
6	75	14	2	1	0	0	0	1	3	1	5	0	0	102	
7	329	37	5	2	2	0	0	1	4	0	7	3	0	390	
8	679	59	2	0	4	0	0	1	5	0	2	6	0	758	
9	529	66	2	2	0	0	0	1	6	0	7	4	0	617	
10	364	66	0	2	5	0	3	0	5	0	5	7	0	457	
11	360	63	8	0	4	0	2	3	4	0	7	3	0	454	
12	314	62	1	1	7	0	0	0	4	0	6	5	0	400	
13	359	58	0	2	5	0	2	1	10	0	4	4	0	445	
14	300	73	4	1	23	0	0	3	5	0	9	7	0	425	
15	364	62	1	2	6	0	1	0	11	0	8	5	0	460	
16	444	89	1	0	1	0	1	4	4	0	6	6	0	556	
17	531	49	0	2	5	0	1	3	2	0	6	3	0	602	
18	451	54	0	0	2	0	1	1	2	0	1	2	0	514	
19	311	27	0	0	3	0	0	0	4	0	3	2	0	350	
20	250	22	0	0	1	0	0	2	1	0	2	3	0	281	
21	158	10	1	0	1	0	0	0	2	0	0	1	0	173	
22	133	7	0	0	3	0	0	0	1	0	4	2	0	150	
23	75	16	1	0	0	1	0	0	0	0	0	1	0	94	
24	30	1	0	0	0	0	0	0	2	0	3	0	0	36	
7-19	5006	728	19	12	65	0	11	17	62	0	64	54	0	6038	
6-22	5876	804	25	14	72	0	11	20	70	0	77	63	0	7032	
6-24	5981	821	26	14	72	1	11	20	72	0	80	64	0	7162	
0-24	6124	857	29	15	75	1	12	22	80	1	97	64	0	7377	

Channel 2 - Eastbound

04/09/2025	Vehicle Classes														
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL	
1	17	4	0	0	1	0	0	0	0	0	1	1	0	24	
2	8	4	0	0	1	0	0	0	1	0	1	0	0	15	
3	5	2	0	0	1	1	0	0	0	0	0	0	0	9	
4	7	5	0	0	0	0	0	0	1	0	0	1	0	14	
5	15	5	0	0	1	0	0	0	8	0	3	1	0	33	
6	53	20	1	0	3	0	0	1	6	0	4	0	0	88	
7	146	45	1	1	3	0	1	0	5	0	4	6	0	212	
8	393	80	2	3	2	0	2	0	7	0	2	6	0	497	
9	492	97	1	2	8	0	0	2	12	0	3	10	0	627	
10	346	77	3	1	6	0	0	1	13	0	7	9	0	463	
11	331	79	3	0	10	0	3	1	4	0	6	8	0	445	
12	343	58	0	1	8	0	7	0	6	0	4	7	0	434	
13	340	53	2	1	8	0	2	0	9	0	7	6	0	428	
14	329	67	2	0	6	0	3	0	7	0	6	4	0	424	
15	342	69	1	1	3	0	2	1	9	0	5	9	0	442	
16	502	71	3	0	5	0	1	1	5	0	2	2	0	592	
17	548	57	1	0	1	0	1	1	2	0	4	1	0	616	
18	588	59	1	1	2	0	0	1	2	0	4	2	0	660	
19	514	52	0	1	5	0	1	1	2	1	2	3	0	582	
20	293	22	0	1	2	0	0	0	1	0	2	1	0	322	
21	183	19	0	0	1	0	0	0	3	0	2	0	0	208	
22	113	10	0	0	0	0	1	0	3	0	0	0	0	127	
23	85	7	0	0	1	0	0	0	6	0	0	0	0	99	
24	28	1	0	0	1	0	0	0	2	0	3	2	0	37	
7-19	5068	819	19	11	64	0	22	9	78	1	52	67	0	6210	
6-22	5803	915	20	13	70	0	24	9	90	1	60	74	0	7079	
6-24	5916	923	20	13	72	0	24	9	98	1	63	76	0	7215	
0-24	6021	963	21	13	79	1	24	10	114	1	72	79	0	7398	

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

04/09/2025	Vehicle Speeds (MPH)												
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+	TOTAL
1	0	0	0	0	1	4	8	5	1	1	0	0	20
2	0	0	0	0	4	1	3	5	3	1	0	0	17
3	0	0	0	0	0	3	5	3	3	2	0	0	16
4	1	1	0	1	2	4	4	6	0	1	0	0	20
5	0	0	0	0	1	9	12	12	3	3	0	0	40
6	0	0	0	0	6	26	36	17	12	5	0	0	102
7	0	0	0	8	26	107	129	83	29	8	0	0	390
8	0	0	2	32	126	276	235	69	15	3	0	0	758
9	0	2	2	10	63	297	162	60	19	2	0	0	617
10	0	0	0	14	59	208	126	43	6	1	0	0	457
11	0	2	7	13	73	225	105	27	1	1	0	0	454
12	0	0	0	2	57	186	118	29	7	1	0	0	400
13	0	2	13	11	64	193	128	29	3	2	0	0	445
14	0	2	5	12	97	174	107	24	0	4	0	0	425
15	0	1	3	13	70	188	141	42	1	1	0	0	460
16	0	2	17	32	72	219	150	47	16	1	0	0	556
17	0	4	24	20	84	202	183	72	12	1	0	0	602
18	0	0	1	4	24	164	220	85	14	1	1	0	514
19	0	2	1	4	15	79	153	81	10	5	0	0	350
20	0	1	0	1	19	88	101	52	15	4	0	0	281
21	0	0	1	2	16	52	52	26	14	8	2	0	173
22	0	0	0	2	20	42	40	28	16	2	0	0	150
23	0	0	0	3	12	31	21	21	6	0	0	0	94
24	0	0	0	0	2	8	14	5	3	3	0	1	36
7-19	0	17	75	167	804	2411	1828	608	104	23	1	0	6038
6-22	0	18	76	180	885	2700	2150	797	178	45	3	0	7032
6-24	0	18	76	183	899	2739	2185	823	187	48	3	1	7162
0-24	1	19	76	184	913	2786	2253	871	209	61	3	1	7377

Channel 2 - Eastbound

04/09/2025	Vehicle Speeds (MPH)													
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+	TOTAL	
1	0	0	0	0	4	3	6	6	2	3	0	0	24	
2	0	0	0	0	1	1	0	6	3	4	0	0	15	
3	0	0	0	0	0	1	1	3	2	1	0	1	9	
4	0	1	0	1	0	1	6	3	2	0	0	0	14	
5	0	0	0	0	1	3	9	9	9	2	0	0	33	
6	0	0	0	0	4	19	34	19	9	3	0	0	88	
7	0	0	0	0	0	11	49	90	42	14	6	0	212	
8	0	0	0	0	6	27	201	196	47	19	1	0	497	
9	1	13	21	10	75	259	200	38	7	3	0	0	627	
10	0	1	6	20	105	166	124	33	8	0	0	0	463	
11	0	0	3	40	110	189	89	11	2	1	0	0	445	
12	0	5	24	35	71	139	123	30	5	1	1	0	434	
13	0	2	2	5	63	133	158	50	13	2	0	0	428	
14	0	2	7	17	73	169	117	30	8	1	0	0	424	
15	0	0	0	3	71	206	125	28	7	2	0	0	442	
16	0	1	0	25	77	254	174	52	6	3	0	0	592	
17	0	0	13	8	53	235	204	87	14	2	0	0	616	
18	0	4	13	22	61	176	244	104	23	12	0	1	660	
19	0	2	1	9	58	158	217	97	31	9	0	0	582	
20	0	2	3	5	10	52	122	86	28	10	3	1	322	
21	0	0	0	1	20	34	76	53	18	6	0	0	208	
22	0	1	0	0	10	18	45	36	10	6	0	1	127	
23	0	0	0	0	6	18	31	20	14	8	2	0	99	
24	0	0	0	0	3	3	13	10	3	5	0	0	37	

7-19	1	30	90	200	844	2285	1971	607	143	37	1	1	6210
6-22	1	33	93	206	895	2438	2304	824	213	65	4	3	7079
6-24	1	33	93	206	904	2459	2348	854	230	78	6	3	7215
0-24	1	34	93	208	915	2486	2412	896	257	86	7	3	7398

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

05/09/2025	Vehicle Classes													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	30	3	0	0	0	0	0	0	0	1	3	1	0	38
2	7	4	0	0	1	0	0	0	3	0	2	0	0	17
3	11	2	0	0	1	0	0	0	1	0	3	0	0	18
4	5	3	0	0	3	0	1	0	1	0	3	0	0	16
5	40	3	1	1	1	0	0	0	1	0	6	0	0	53
6	64	13	1	1	0	0	1	0	5	0	2	1	0	88
7	270	33	0	2	0	0	0	1	5	0	6	5	0	322
8	509	62	2	3	2	0	0	1	3	0	4	5	0	591
9	515	64	1	3	4	0	0	0	8	0	8	5	0	608
10	412	88	0	5	3	0	2	2	5	0	5	10	0	532
11	434	59	2	2	4	0	8	2	0	0	10	6	0	527
12	412	72	4	1	6	0	7	0	8	0	5	6	0	521
13	409	60	4	2	5	0	2	1	8	0	2	4	0	497
14	476	56	5	3	7	1	3	1	15	0	7	6	0	580
15	517	98	2	0	6	0	2	1	7	0	5	8	0	646
16	545	79	1	0	7	0	3	1	5	0	3	7	0	651
17	628	54	0	0	2	0	1	1	2	0	1	4	0	693
18	531	49	0	0	1	0	0	2	2	0	3	2	0	590
19	389	39	1	1	0	0	0	1	0	0	0	4	0	435
20	259	28	0	0	1	0	0	0	2	0	3	2	0	295
21	175	19	0	0	1	0	0	0	0	0	0	1	0	196
22	159	12	0	0	4	0	0	0	2	0	1	0	0	178
23	112	18	0	0	3	1	0	0	1	0	0	1	0	136
24	63	6	0	0	1	0	1	1	0	0	2	0	0	74
7-19	5777	780	22	20	47	1	28	13	63	0	53	67	0	6871
6-22	6640	872	22	22	53	1	28	14	72	0	63	75	0	7862
6-24	6815	886	22	22	57	2	29	15	73	0	65	76	0	8072
0-24	6972	924	24	24	63	2	31	15	84	1	84	78	0	8302

Channel 2 - Eastbound

05/09/2025	Vehicle Classes													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	16	4	0	0	0	0	0	0	0	0	1	0	0	21
2	7	1	0	0	0	0	0	0	1	0	1	1	0	11
3	9	2	0	0	0	0	0	0	1	0	1	1	0	14
4	8	2	0	0	0	0	0	0	0	0	1	2	0	13
5	19	5	0	0	4	0	0	0	4	0	2	0	0	34
6	61	18	3	0	3	0	0	0	10	0	1	2	0	98
7	173	47	1	0	3	0	0	0	1	0	5	1	0	231
8	344	89	4	1	6	0	2	1	7	0	9	9	0	472
9	511	110	2	2	1	0	1	1	7	0	3	8	0	646
10	394	77	3	1	4	0	0	0	6	0	8	3	0	496
11	389	62	0	0	3	0	0	1	8	0	2	10	0	475
12	397	73	4	1	2	0	1	2	8	0	9	3	0	500
13	502	70	4	1	2	0	7	0	10	0	5	4	0	605
14	473	77	3	2	3	0	2	0	6	0	9	5	0	580
15	483	80	1	0	6	0	4	1	7	0	7	5	0	594
16	494	72	2	0	1	0	1	1	3	0	8	3	0	585
17	567	51	0	0	6	0	1	0	3	1	5	2	0	636
18	503	60	0	1	2	0	1	0	0	0	4	5	0	576
19	381	45	1	0	0	0	1	1	2	0	6	2	0	439
20	338	36	0	0	4	0	0	1	0	3	0	2	0	384
21	225	11	0	0	1	0	1	0	1	0	1	0	0	240
22	136	8	0	0	0	0	0	0	4	0	0	0	0	148
23	99	11	0	0	0	0	0	0	2	0	2	1	0	115
24	61	7	0	0	0	0	0	0	0	0	1	1	0	70
7-19	5438	866	24	9	36	0	21	8	67	1	75	59	0	6604
6-22	6310	968	25	9	44	0	23	8	76	1	83	60	0	7607
6-24	6470	986	25	9	44	0	23	8	78	1	86	62	0	7792
0-24	6590	1018	28	9	51	0	23	8	94	1	93	68	0	7983

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

05/09/2025	Vehicle Speeds (MPH)													TOTAL
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+		
1	0	0	0	0	1	8	12	7	5	3	0	2		38
2	0	0	0	0	0	3	6	6	1	1	0	0		17
3	0	0	0	0	0	4	6	4	3	1	0	0		18
4	0	0	0	0	2	4	3	4	2	1	0	0		16
5	0	0	0	2	4	13	17	8	6	3	0	0		53
6	0	0	0	2	4	14	25	23	10	10	0	0		88
7	0	0	0	0	25	97	104	63	28	3	2	0		322
8	0	0	0	2	60	200	244	70	13	2	0	0		591
9	0	11	8	14	77	222	216	48	10	2	0	0		608
10	0	0	4	20	122	220	122	37	6	1	0	0		532
11	0	3	8	14	139	211	134	13	5	0	0	0		527
12	0	16	16	10	116	208	133	21	1	0	0	0		521
13	0	1	17	23	85	196	141	27	6	1	0	0		497
14	0	3	6	5	66	268	179	44	7	2	0	0		580
15	0	1	5	3	85	250	219	67	16	0	0	0		646
16	0	0	0	4	118	266	217	38	5	3	0	0		651
17	0	1	2	9	62	312	222	74	9	2	0	0		693
18	0	0	6	7	87	202	200	71	16	1	0	0		590
19	0	0	0	2	44	144	151	66	22	6	0	0		435
20	0	0	0	2	33	97	96	48	14	4	0	1		295
21	0	0	3	11	43	57	48	18	12	4	0	0		196
22	0	2	0	4	20	67	57	20	7	1	0	0		178
23	0	0	0	3	27	43	30	22	9	2	0	0		136
24	0	0	0	0	9	24	13	16	6	5	1	0		74
7-19	0	36	72	113	1061	2699	2178	576	116	20	0	0		6871
6-22	0	38	75	130	1182	3017	2483	725	177	32	2	1		7862
6-24	0	38	75	133	1218	3084	2526	783	192	39	3	1		8072
0-24	0	38	75	137	1229	3130	2595	815	219	58	3	3		8302

Channel 2 - Eastbound

05/09/2025	Vehicle Speeds (MPH)													TOTAL
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+		
1	0	0	0	2	0	1	6	4	5	1	2	0		21
2	0	0	0	0	1	1	5	1	1	2	0	0		11
3	0	0	0	0	0	0	4	2	6	0	1	1		14
4	0	0	0	1	0	0	6	2	3	1	0	0		13
5	0	0	0	0	1	0	5	17	10	0	1	0		34
6	0	0	0	0	1	13	40	25	11	7	1	0		98
7	0	0	0	1	9	32	77	64	34	12	1	1		231
8	0	0	0	1	30	153	190	82	12	3	1	0		472
9	0	16	23	19	77	243	213	47	6	2	0	0		646
10	0	2	49	4	61	174	168	26	9	3	0	0		496
11	0	2	0	3	56	216	162	32	3	1	0	0		475
12	0	1	6	22	75	214	136	35	8	3	0	0		500
13	0	1	1	9	100	232	208	46	3	5	0	0		605
14	0	1	2	1	56	216	229	68	7	0	0	0		580
15	0	0	3	10	63	289	175	47	6	1	0	0		594
16	0	2	0	12	61	192	219	82	12	3	2	0		585
17	0	3	19	8	108	229	211	43	11	4	0	0		636
18	0	1	0	6	43	192	221	89	20	2	1	1		576
19	0	0	3	5	33	116	169	93	17	2	1	0		439
20	0	1	0	0	16	110	176	61	10	9	1	0		384
21	0	1	0	3	33	87	64	36	9	7	0	0		240
22	0	1	0	6	21	28	43	33	11	4	1	0		1

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

06/09/2025	Vehicle Classes														TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13		
1	47	1	0	0	0	0	0	0	0	0	1	0	0	49	
2	13	3	0	0	0	0	0	0	0	0	1	0	0	17	
3	12	2	0	0	1	0	0	0	1	0	1	0	0	17	
4	11	2	0	0	1	0	0	0	1	0	1	0	0	16	
5	25	3	1	0	0	0	0	0	0	0	2	0	0	31	
6	46	11	0	0	4	0	0	0	2	0	5	2	0	70	
7	94	17	1	0	2	0	0	0	0	0	2	1	0	117	
8	175	27	1	1	4	0	1	1	5	0	0	4	0	219	
9	235	34	1	0	1	0	3	0	3	0	1	2	0	280	
10	339	26	2	2	4	0	0	1	2	0	4	4	0	384	
11	472	41	0	1	7	0	2	0	3	0	2	3	0	531	
12	508	43	0	1	3	0	1	0	0	0	1	1	0	558	
13	510	37	0	0	6	0	0	0	3	1	2	2	0	561	
14	501	35	1	0	3	0	1	2	3	1	4	3	0	554	
15	472	25	1	2	2	0	2	3	2	0	0	1	0	510	
16	495	32	0	1	6	0	1	1	1	0	3	2	0	542	
17	493	18	0	1	2	0	0	0	0	0	1	2	0	517	
18	373	27	0	0	1	0	0	0	0	0	1	1	0	403	
19	359	36	0	0	1	0	0	0	0	0	0	2	0	398	
20	259	20	0	1	0	0	0	0	0	0	1	5	0	286	
21	201	11	0	0	0	0	0	0	0	0	0	1	0	213	
22	149	11	0	0	0	0	0	0	0	0	1	0	0	161	
23	100	6	0	0	0	0	0	1	0	0	1	0	0	108	
24	97	1	1	0	0	0	0	0	0	0	0	0	0	99	
7-19	4932	381	6	9	40	0	11	8	22	2	19	27	0	5457	
6-22	5635	440	7	10	42	0	11	8	22	2	23	34	0	6234	
6-24	5832	447	8	10	42	0	11	9	22	2	24	34	0	6441	
0-24	5986	469	9	10	48	0	11	9	26	2	35	36	0	6641	

Channel 2 - Eastbound

06/09/2025	Vehicle Classes														TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13		
1	34	1	0	0	0	0	0	0	2	0	5	0	0	42	
2	19	4	0	0	1	1	0	0	0	0	0	0	0	25	
3	18	1	0	0	1	0	0	0	0	0	0	0	0	20	
4	12	1	0	0	0	0	0	0	1	0	0	0	0	14	
5	13	6	0	1	2	0	0	0	3	0	4	0	0	29	
6	33	6	1	0	0	0	0	0	4	0	2	0	0	46	
7	70	19	2	1	3	0	0	0	0	0	3	2	0	100	
8	149	38	1	0	1	0	0	0	6	0	4	2	0	201	
9	279	45	2	1	11	0	1	1	1	0	6	2	0	349	
10	394	45	1	2	12	0	1	0	3	0	4	4	0	466	
11	470	41	2	1	3	0	2	1	5	0	6	3	0	534	
12	527	46	1	0	0	0	1	3	0	0	2	3	0	583	
13	486	46	1	1	1	0	2	0	0	0	2	1	0	540	
14	448	32	0	2	0	0	1	0	0	0	2	2	0	487	
15	388	44	2	0	1	0	3	1	0	0	0	2	0	441	
16	421	42	0	0	2	0	1	0	1	0	1	1	0	469	
17	358	32	1	0	1	0	0	0	1	0	1	1	0	395	
18	414	29	0	0	0	0	1	0	2	0	1	0	0	447	
19	316	23	0	0	0	0	1	0	2	0	0	1	0	343	
20	260	19	0	0	0	0	0	0	0	0	0	0	0	279	
21	179	15	0	0	0	0	0	0	1	0	1	0	0	196	
22	136	11	0	0	0	0	1	0	1	0	0	0	0	149	
23	110	13	0	0	0	0	0	0	1	0	0	0	0	124	
24	99	10	0	1	1	0	0	0	0	0	2	0	0	113	
7-19	4650	463	11	7	32	0	14	6	21	0	29	22	0	5255	
6-22	5295	527	13	8	35	0	15	6	23	0	33	24	0	5979	
6-24	5504	550	13	9	36	0	15	6	24	0	35	24	0	6216	
0-24	5633	569	14	10	40	1	15	6	34	0	46	24	0	6392	

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

06/09/2025	Vehicle Speeds (MPH)														TOTAL
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+			
1	0	1	1	0	3	12	16	6	6	4	0	0	49		
2	0	1	0	0	2	3	5	4	2	0	0	0	17		
3	0	0	0	0	4	1	5	3	4	0	0	0	17		
4	0	0	0	0	2	4	3	4	1	2	0	0	16		
5	0	0	0	0	4	5	12	6	2	1	0	1	31		
6	0	0	0	0	4	21	23	14	4	0	4	0	70		
7	0	0	0	0	7	14	45	39	6	5	1	0	117		
8	0	0	5	9	23	41	86	36	15	4	0	0	219		
9	0	2	3	2	14	93	101	45	14	4	1	1	280		
10	0	0	1	11	26	145	143	40	16	1	1	0	384		
11	0	0	0	1	69	232	151	56	18	3	1	0	531		
12	0	0	0	2	80	271	151	43	9	2	0	0	558		
13	1	2	10	14	65	198	196	61	13	1	0	0	561		
14	0	1	0	5	67	219	193	54	8	6	1	0	554		
15	0	0	0	2	58	221	168	36	15	7	2	1	510		
16	0	0	14	10	49	178	199	70	17	3	2	0	542		
17	0	1	0	4	40	198	198	61	13	2	0	0	517		
18	0	0	0	5	35	129	154	62	15	3	0	0	403		
19	0	1	0	6	24	135	158	54	16	2	1	1	398		
20	0	0	0	1	10	88	94	70	20	3	0	0	286		
21	0	0	0	0	25	90	59	32	4	3	0	0	213		
22	0	0	0	4	22	54	42	18	16	5	0	0	161		
23	0	0	0	1	8	34	29	20	13	3	0	0	108		
24	0	0	0	1	10	27	29	20	6	6	0	0	99		

7-19	1	7	33	71	550	2060	1898	618	169	38	9	3	5457
6-22	1	7	33	76	614	2306	2138	777	215	54	10	3	6234
6-24	1	7	33	78	632	2367	2196	817	234	63	10	3	6441
0-24	1	9	34	78	651	2413	2260	854	253	70	14	4	6641

Channel 2 - Eastbound

06/09/2025	Vehicle Speeds (MPH)														TOTAL
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+			
1	0	2	0	0	3	4	12	7	9	5	0	0	42		
2	0	1	0	0	0	0	3	10	7	4	0	0	25		
3	0	0	0	1	1	4	1	4	5	4	0	0	20		
4	0	0	0	0	0	1	4	4	0	5	0	0	14		
5	0	0	0	0	0	0	10	13	5	1	0	0	29		
6	0	0	0	0	0	2	22	11	8	3	0	0	46		
7	0	0	0	0	1	10	34	34	13	8	0	0	100		
8	0	0	1	3	5	22	84	40	32	12	1	1	201		
9	0	1	0	3	21	109	143	53	11	7	0	1	349		
10	0	2	0	4	20	177	185	51	20	7	0	0	466		
11	0	0	0	4	48	248	194	30	8	2	0	0	534		
12	0	0	2	8	60	249	194	63	5	2	0	0	583		
13	2	7	18	8	58	212	181	39	13	2	0	0	540		
14	0	1	0	7	55	177	176	53	14	3	1	0	487		
15	0	0	21	7	28	163	158	57	6	1	0	0	441		
16	0	3	17	21	50	151	161	41	20	4	1	0	469		
17	0	0	0	1	20	147	153	59	14	1	0	0	395		
18	0	0	1	10	43	123	160	83	20	7	0	0	447		
19	0	0	0	0	5	84	145	73	28	6	2	0	343		
20	0	0	0	3	21	86	84	61	19	4	1	0	279		
21	0	0	8	5	23	52	69	30	8	1	0	0	196		
22	0	0	0	6	15	53	40	20	9	5	0	1	149		
23	0	0	0	2	7	33	37	26	14	3	2	0	124		
24	0	0	0	0	5	28	34	26	14	4	1	1	113		

7-19	2	14	60	76	413	1862	1934	642	191	54	5	2	5255
6-22	2	14	68	90	473	2063	2161	787	240	72	6	3	5979
6-24	2	14	68	92	485	2124	2232	839	268	79	9	4	6216
0-24	2	17	68	93	489	2135	2284	888	302	101	9	4	6392

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

07/09/2025	Vehicle Classes														
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL	
1	59	3	0	0	0	0	0	0	0	0	0	0	0	62	
2	27	3	0	0	0	0	0	0	0	0	1	0	0	31	
3	14	0	0	0	0	0	0	0	1	0	0	0	0	15	
4	16	0	0	1	0	0	0	0	0	0	0	0	0	17	
5	15	3	0	0	1	0	0	0	0	0	1	1	0	21	
6	29	1	0	1	1	0	0	0	1	0	2	0	0	35	
7	60	6	1	1	0	0	0	0	2	0	1	2	0	73	
8	119	7	0	2	0	0	0	0	1	1	3	0	0	133	
9	188	16	0	1	3	0	0	0	4	0	1	1	0	214	
10	384	38	0	0	2	0	5	1	1	0	3	1	0	435	
11	442	38	0	1	2	0	4	0	0	0	1	2	0	490	
12	543	36	0	3	0	0	6	1	1	0	0	1	0	591	
13	526	51	0	0	0	0	5	0	1	0	0	1	0	584	
14	472	39	1	0	2	0	1	1	0	0	2	0	0	518	
15	437	25	0	0	2	0	3	0	2	0	0	0	0	469	
16	379	27	0	0	1	0	2	0	0	0	0	3	0	412	
17	369	25	0	0	2	0	0	1	0	0	1	1	0	399	
18	349	21	0	0	1	0	2	0	0	0	0	1	0	374	
19	290	16	0	0	0	0	0	0	0	0	0	1	0	307	
20	180	16	0	0	0	0	0	0	0	0	1	0	0	197	
21	128	9	0	0	1	0	0	1	0	0	0	0	0	139	
22	77	2	0	0	1	0	0	0	0	0	0	0	0	80	
23	40	4	1	0	0	0	0	0	1	0	0	1	0	47	
24	18	2	0	0	0	0	0	0	0	0	0	0	0	20	
7-19	4498	339	1	7	15	0	28	4	10	1	11	12	0	4926	
6-22	4943	372	2	8	17	0	28	5	12	1	13	14	0	5415	
6-24	5001	378	3	8	17	0	28	5	13	1	13	15	0	5482	
0-24	5161	388	3	10	19	0	28	5	15	1	17	16	0	5663	

Channel 2 - Eastbound

07/09/2025	Vehicle Classes														
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL	
1	59	4	0	0	0	0	0	0	0	0	1	0	0	64	
2	40	3	0	0	0	0	0	0	0	0	0	0	0	43	
3	15	3	0	0	1	0	0	0	0	0	0	0	0	19	
4	13	3	0	0	0	0	0	0	0	0	0	0	0	16	
5	15	0	0	0	0	0	0	1	0	0	1	0	0	17	
6	20	6	0	0	0	0	0	0	3	1	2	0	0	32	
7	45	11	0	0	0	0	0	0	1	0	1	0	0	58	
8	89	10	0	0	6	0	0	0	2	0	3	0	0	110	
9	163	31	1	0	1	0	0	0	0	0	1	1	0	198	
10	263	30	0	1	0	0	3	0	0	0	1	1	0	299	
11	425	33	1	0	1	0	3	0	1	0	2	0	0	466	
12	446	53	0	0	0	0	4	0	0	0	2	1	0	506	
13	516	40	1	0	1	0	5	0	3	0	0	0	0	566	
14	469	24	2	0	2	0	5	0	1	0	0	0	0	503	
15	394	40	1	0	1	0	2	0	1	0	0	1	0	440	
16	388	38	1	2	1	0	1	0	0	1	0	1	0	433	
17	413	34	2	0	1	0	0	1	0	0	0	0	0	451	
18	310	24	0	0	1	0	0	0	0	0	0	3	0	338	
19	234	18	0	0	0	0	1	0	0	0	0	1	0	254	
20	238	17	0	0	3	0	1	0	1	0	0	0	0	260	
21	171	14	0	0	0	0	0	0	0	0	0	1	0	186	
22	108	8	0	0	0	0	1	0	1	0	0	0	0	118	
23	50	6	0	0	0	0	0	0	0	0	1	0	0	57	
24	29	1	0	0	0	0	0	0	0	0	2	0	0	32	
7-19	4110	375	9	3	15	0	24	1	8	1	9	9	0	4564	
6-22	4672	425	9	3	18	0	26	1	11	1	10	10	0	5186	
6-24	4751	432	9	3	18	0	26	1	11	1	13	10	0	5275	
0-24	4913	451	9	3	19	0	26	2	14	2	17	10	0	5466	

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

07/09/2025	Vehicle Speeds (MPH)													
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+	TOTAL	
1	0	0	0	3	5	16	17	11	8	2	0	0	62	
2	0	0	0	1	3	4	12	5	4	2	0	0	31	
3	0	0	0	0	0	3	3	5	2	2	0	0	15	
4	0	0	0	1	2	1	4	5	3	1	0	0	17	
5	0	0	0	0	2	5	5	5	2	2	0	0	21	
6	0	0	0	1	0	9	12	5	6	2	0	0	35	
7	0	0	0	0	2	17	24	18	5	5	1	1	73	
8	0	0	0	0	12	22	52	30	12	5	0	0	133	
9	0	0	3	0	13	60	87	35	14	2	0	0	214	
10	0	0	0	10	43	165	141	57	15	4	0	0	435	
11	0	0	9	15	75	173	178	30	9	1	0	0	490	
12	0	0	2	18	102	246	179	36	6	2	0	0	591	
13	0	3	4	12	117	241	156	41	9	0	1	0	584	
14	0	16	49	58	143	179	56	11	2	4	0	0	518	
15	4	21	25	18	101	171	97	31	0	1	0	0	469	
16	0	0	2	12	65	161	131	33	7	1	0	0	412	
17	0	1	1	3	32	142	161	45	11	2	1	0	399	
18	0	2	1	8	26	132	128	53	17	7	0	0	374	
19	0	0	0	2	16	94	90	72	24	8	1	0	307	
20	0	0	0	2	28	55	58	40	9	5	0	0	197	
21	0	1	0	3	9	54	37	28	5	2	0	0	139	
22	0	0	0	0	9	27	23	12	6	2	1	0	80	
23	0	0	0	0	4	9	17	5	9	3	0	0	47	
24	0	0	0	0	0	6	2	3	8	1	0	0	20	

7-19	4	43	96	156	745	1786	1456	474	126	37	3	0	4926
6-22	4	44	96	161	793	1939	1598	572	151	51	5	1	5415
6-24	4	44	96	161	797	1954	1617	580	168	55	5	1	5482
0-24	4	44	96	167	809	1992	1670	616	193	66	5	1	5663

Channel 2 - Eastbound

07/09/2025	Vehicle Speeds (MPH)													
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+	TOTAL	
1	0	0	0	2	3	13	18	15	10	3	0	0	64	
2	0	0	0	0	0	6	14	13	4	6	0	0	43	
3	0	0	1	0	3	3	5	6	1	0	0	0	19	
4	0	0	0	0	0	3	5	2	0	5	1	0	16	
5	0	0	0	0	0	5	2	7	3	0	0	0	17	
6	0	0	0	0	2	4	16	6	3	1	0	0	32	
7	0	0	1	0	1	9	25	11	7	4	0	0	58	
8	0	0	1	0	2	13	29	29	24	11	1	0	110	
9	0	1	0	0	9	33	79	51	17	7	1	0	198	
10	0	0	0	0	7	81	130	62	18	1	0	0	299	
11	0	0	2	7	54	184	153	47	15	4	0	0	466	
12	0	1	0	6	52	262	120	53	7	3	2	0	506	
13	0	1	10	10	92	201	189	51	11	1	0	0	566	
14	0	0	4	34	161	198	87	11	4	4	0	0	503	
15	0	2	0	13	76	205	109	27	5	3	0	0	440	
16	0	2	0	3	39	175	141	58	12	3	0	0	433	
17	0	4	15	5	26	95	205	79	19	3	0	0	451	
18	0	0	0	0	6	61	153	91	19	8	0	0	338	
19	0	0	0	0	1	41	99	84	23	5	0	1	254	
20	0	0	0	0	1	34	43	95	59	21	6	1	260	
21	0	0	0	0	4	32	48	61	26	8	6	1	186	
22	0	0	0	0	3	11	26	28	31	14	5	0	118	
23	0	0	0	0	0	6	10	8	16	9	8	0	57	
24	0	0	1	0	0	6	8	9	6	1	1	0	32	

7-19	0	11	32	78	525	1549	1494	643	174	53	4	1	4564
6-22	0	11	33	86	603	1675	1703	770	224	74	6	1	5186
6-24	0	11	34	86	609	1691	1719	795	239	83	7	1	5275
0-24	0	11	35	88	617	1725	1779	844	260	98	8	1	5466

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

08/09/2025	Vehicle Classes													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	11	2	0	0	0	0	0	0	0	0	0	1	0	14
2	8	4	0	0	0	0	0	0	0	0	3	0	0	15
3	7	2	0	0	1	0	0	0	0	0	2	0	0	12
4	18	4	0	0	2	0	0	0	2	0	3	0	0	29
5	47	6	2	0	1	0	0	1	4	0	0	0	0	61
6	106	14	2	1	4	0	0	0	2	0	6	1	0	136
7	324	44	2	0	2	0	0	1	5	1	7	2	0	388
8	687	70	4	2	6	0	0	1	5	0	7	6	0	788
9	565	64	3	2	2	0	2	0	2	0	7	5	0	652
10	360	75	3	2	4	0	2	0	3	0	5	4	0	458
11	363	64	2	0	0	0	2	5	5	0	5	5	0	451
12	348	55	0	0	6	0	2	3	6	0	3	4	0	427
13	331	54	1	1	3	0	0	1	4	0	3	3	0	401
14	339	65	3	1	6	0	2	3	10	0	11	6	0	446
15	347	59	3	0	8	0	1	3	8	0	5	6	0	440
16	476	85	3	0	4	0	0	0	7	0	1	6	0	582
17	533	69	0	0	2	0	0	0	3	0	4	5	0	616
18	450	39	0	1	3	0	0	2	6	0	3	1	0	505
19	311	37	0	0	1	0	0	0	3	0	3	4	0	359
20	199	21	1	0	1	0	0	0	3	0	2	2	0	229
21	136	12	0	0	3	0	1	0	3	0	1	1	0	157
22	97	8	1	0	1	0	0	0	2	0	1	0	0	110
23	57	8	0	0	0	1	0	0	1	0	1	1	0	69
24	17	2	0	0	1	0	0	0	2	0	2	1	0	25
7-19	5110	736	22	9	45	0	11	18	62	0	57	55	0	6125
6-22	5866	821	26	9	52	0	12	19	75	1	68	60	0	7009
6-24	5840	831	26	9	53	1	12	19	78	1	71	62	0	7103
0-24	6137	863	30	10	61	1	12	20	86	1	85	64	0	7370

Channel 2 - Eastbound

08/09/2025	Vehicle Classes													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	20	1	0	0	0	0	0	0	1	0	0	0	0	22
2	10	4	0	0	0	0	0	0	0	0	0	0	0	14
3	10	0	0	0	0	0	0	0	1	0	0	0	0	11
4	10	2	0	0	0	0	0	0	2	0	0	0	0	14
5	19	5	1	0	4	0	0	0	3	0	1	1	0	34
6	68	11	0	0	3	0	0	0	6	0	5	1	0	94
7	179	46	1	2	3	0	1	2	4	1	7	4	0	250
8	389	81	0	1	10	0	0	0	6	0	5	6	0	498
9	505	127	1	0	4	0	0	1	5	0	6	9	0	658
10	376	70	3	1	7	0	0	4	10	0	7	3	0	481
11	331	75	1	0	5	0	2	0	7	0	6	1	0	428
12	344	72	1	1	5	0	1	3	7	0	8	5	0	447
13	331	77	2	3	5	0	4	0	5	0	3	6	0	436
14	338	60	2	0	2	0	5	3	5	0	8	7	0	430
15	368	53	4	0	10	0	4	0	9	0	12	7	0	467
16	468	63	4	0	3	0	1	1	7	0	0	0	0	547
17	521	73	0	0	1	0	0	0	4	0	6	3	0	608
18	572	68	1	0	4	0	0	1	2	0	6	2	0	656
19	396	31	0	1	2	0	1	0	3	0	3	1	0	438
20	229	23	0	0	4	0	0	0	6	0	0	0	0	262
21	156	14	0	0	0	0	0	0	0	0	2	0	0	172
22	87	12	0	0	0	0	0	0	4	0	1	0	0	104
23	67	7	0	0	1	0	0	0	3	0	0	0	0	78
24	27	9	2	0	1	0	0	0	3	0	4	0	0	46
7-19	4939	850	19	7	58	0	18	13	70	0	70	50	0	6094
6-22	5590	945	20	9	65	0	19	15	84	1	80	54	0	6882
6-24	5684	961	22	9	67	0	19	15	90	1	84	54	0	7006
0-24	5821	984	23	9	74	0	19	15	103	1	90	56	0	7195

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

08/09/2025	Vehicle Speeds (MPH)													TOTAL
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+		
1	0	0	0	0	0	2	6	1	4	1	0	0		14
2	0	0	0	1	2	2	6	1	2	1	0	0		15
3	0	0	0	0	1	0	2	6	1	2	0	0		12
4	0	0	0	0	1	5	11	9	2	1	0	0		29
5	0	0	0	1	5	8	24	9	10	4	0	0		61
6	0	0	0	0	2	23	46	43	16	6	0	0		136
7	0	1	0	0	15	93	166	80	25	6	2	0		388
8	0	2	1	18	139	317	235	62	12	2	0	0		788
9	0	1	0	2	91	275	223	46	9	4	1	0		652
10	0	3	2	3	58	214	130	37	10	1	0	0		458
11	0	1	0	13	84	203	115	27	6	2	0	0		451
12	0	0	0	8	65	207	108	33	6	0	0	0		427
13	1	2	5	5	50	144	147	41	5	1	0	0		401
14	0	1	2	9	85	182	136	27	3	1	0	0		446
15	0	1	2	15	55	180	127	50	8	2	0	0		440
16	0	2	1	12	108	244	163	44	7	1	0	0		582
17	0	0	0	11	87	248	212	48	9	1	0	0		616
18	0	1	0	4	49	151	189	88	18	5	0	0		505
19	0	0	0	0	27	111	142	60	18	1	0	0		359
20	0	3	0	3	34	42	75	52	14	5	1	0		229
21	0	0	0	1	15	50	47	25	15	4	0	0		157
22	0	1	2	2	9	29	30	20	13	4	0	0		110
23	0	0	0	1	10	15	23	10	7	2	1	0		69
24	0	0	0	1	2	3	10	6	2	1	0	0		25
7-19	1	14	13	100	898	2476	1927	563	111	21	1	0		6125
6-22	1	19	15	106	971	2690	2245	740	178	40	4	0		7009
6-24	1	19	15	108	983	2708	2278	756	187	43	5	0		7103
0-24	1	19	15	110	994	2748	2373	825	222	58	5	0		7370

Channel 2 - Eastbound

08/09/2025	Vehicle Speeds (MPH)													TOTAL
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+		
1	0	0	0	0	0	3	4	6	6	2	1	0		22
2	0	0	0	0	0	1	1	7	3	2	0	0		14
3	0	0	0	0	0	0	2	1	5	2	1	0		11
4	0	0	0	0	0	0	5	1	7	1	0	0		14
5	0	0	0	0	0	1	8	17	4	4	0	0		34
6	0	0	0	0	3	16	24	29	17	5	0	0		94
7	0	1	0	6	15	48	83	56	35	5	1	0		250
8	0	0	0	0	40	182	186	73	15	2	0	0		498
9	0	1	1	19	74	249	232	70	8	4	0	0		658
10	0	0	1	9	44	162	171	72	21	1	0	0		481
11	0	1	0	1	42	167	162	47	8	0	0	0		428
12	0	1	0	26	78	150	145	42	4	1	0	0		447
13	0	0	0	1	20	186	179	41	8	1	0	0		436
14	0	1	5	17	98	178	104	21	4	1	1	0		430
15	0	2	0	9	78	173	162	30	9	3	0	1		467
16	0	0	12	4	55	219	192	51	13	1	0	0		547
17	0	1	0	1	38	188	243	118	13	6	0	0		608
18	0	0	0	9	38	196	274	107	28	4	0	0		656
19	0	1	2	2	37	126	174	73	19	4	0	0		438
20	0	1	1	12	24	24	90	70	33	7	0	0		262
21	0	0	0	0	12	38	62	41	13	5	0	1		172
22	0	0	1	8	7	27	25	17	11	7	1	0		104
23	0	0	0	1	5	17	20	12	14	9	0	0		78
24	0	0	0	0	2	2	15	14	9	3	1	0		

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

09/09/2025	Vehicle Classes														TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13		
1	14	1	0	0	0	0	0	0	0	0	3	0	0	18	
2	8	4	0	0	0	0	0	0	5	0	2	0	0	19	
3	14	5	0	0	0	0	0	0	1	0	1	0	0	21	
4	12	2	1	0	3	0	0	0	1	0	0	0	0	19	
5	30	4	1	1	4	0	0	0	1	0	5	0	0	46	
6	93	13	3	0	5	0	0	0	5	0	7	1	0	127	
7	353	49	4	1	4	0	0	1	4	0	10	3	0	429	
8	705	61	6	2	3	0	0	0	5	0	3	4	0	789	
9	583	72	0	2	1	0	1	1	2	0	4	3	0	669	
10	414	82	1	2	3	0	4	1	4	0	10	9	0	530	
11	356	72	3	3	5	0	2	3	4	0	3	9	0	460	
12	337	68	5	2	10	0	1	2	7	0	6	5	0	443	
13	309	48	3	1	4	0	3	2	5	0	7	8	0	390	
14	351	66	4	3	5	0	3	1	11	0	9	11	0	464	
15	361	63	3	3	13	0	0	1	6	0	11	3	0	464	
16	531	94	1	4	7	0	0	1	4	0	5	5	0	652	
17	581	86	1	1	3	0	0	2	3	0	4	6	0	687	
18	522	54	1	1	2	0	1	0	8	0	7	4	0	600	
19	349	25	1	0	5	0	0	1	4	0	1	3	0	389	
20	265	23	0	1	4	0	0	0	1	0	2	2	0	298	
21	167	19	0	0	6	0	0	0	1	0	0	1	0	194	
22	92	7	0	0	3	0	0	1	2	0	1	1	0	107	
23	66	3	0	0	0	1	0	3	2	0	0	0	0	75	
24	27	2	0	0	0	0	0	0	0	0	6	0	0	35	
7-19	5399	791	29	24	61	0	15	15	63	0	70	70	0	6537	
6-22	6276	889	33	26	78	0	15	17	71	0	83	77	0	7565	
6-24	6369	894	33	26	78	1	15	20	73	0	89	77	0	7675	
0-24	6540	923	38	27	90	1	15	20	86	0	107	78	0	7925	

Channel 2 - Eastbound

09/09/2025	Vehicle Classes														
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL	
1	15	2	0	0	0	0	0	0	0	0	5	0	0	22	
2	11	3	0	0	1	0	0	0	0	0	0	1	0	16	
3	8	4	0	0	0	1	0	0	1	0	0	0	0	14	
4	6	3	0	0	0	0	0	0	0	0	2	0	0	11	
5	13	9	0	0	3	0	0	1	6	0	5	0	0	37	
6	63	12	1	0	3	0	0	0	6	0	2	2	0	89	
7	187	49	2	1	2	0	2	0	6	0	6	3	0	258	
8	411	91	1	2	1	0	0	1	5	0	3	4	0	519	
9	497	119	2	1	4	0	2	1	4	0	4	9	0	643	
10	394	84	2	3	6	0	0	3	10	0	7	10	0	519	
11	313	76	5	1	5	0	1	1	9	0	9	7	0	427	
12	344	58	1	2	4	0	0	0	4	0	4	6	0	423	
13	338	43	4	0	11	0	2	2	4	0	5	5	0	414	
14	327	48	1	1	2	0	3	1	6	0	5	6	0	400	
15	371	63	4	0	6	0	0	1	6	0	11	3	0	465	
16	495	74	2	2	7	0	3	1	5	0	8	3	0	600	
17	544	65	0	2	8	0	0	0	5	1	5	1	0	631	
18	602	59	2	0	6	0	0	1	3	0	4	1	0	678	
19	463	51	2	0	3	0	0	2	2	0	7	3	0	533	
20	293	24	1	0	1	0	0	1	0	0	4	1	0	325	
21	192	19	1	0	0	0	0	0	5	0	1	0	0	218	
22	139	9	0	0	0	0	0	4	2	0	1	0	0	155	
23	71	8	0	0	1	0	0	0	4	0	1	2	0	87	
24	26	7	0	0	1	0	0	0	0	0	2	1	0	37	
7-19	5099	831	26	14	63	0	11	14	63	1	72	58	0	6252	
6-22	5910	932	30	15	66	0	13	19	76	1	84	62	0	7208	
6-24	6007	947	30	15	68	0	13	19	80	1	87	65	0	7332	
0-24	6123	980	31	15	75	1	13	20	93	1	101	68	0	7521	

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

09/09/2025	Vehicle Speeds (MPH)												
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+	TOTAL
1	0	0	0	1	1	6	2	6	0	2	0	0	18
2	0	0	0	0	0	1	8	6	4	0	0	0	19
3	0	0	2	5	1	0	3	5	3	2	0	0	21
4	0	0	0	0	1	4	6	5	3	0	0	0	19
5	0	0	0	0	4	13	13	7	3	5	0	1	46
6	0	1	0	0	11	27	41	28	13	6	0	0	127
7	0	2	1	0	38	120	154	71	33	10	0	0	429
8	1	56	14	5	48	276	286	89	14	0	0	0	789
9	0	5	5	4	75	257	241	71	9	2	0	0	669
10	0	5	2	12	98	235	141	30	6	1	0	0	530
11	0	2	6	16	88	211	112	17	6	1	1	0	460
12	0	2	19	27	76	159	122	34	4	0	0	0	443
13	0	0	0	6	71	159	121	24	7	2	0	0	390
14	0	2	0	2	99	204	100	45	10	0	2	0	464
15	0	0	2	3	70	200	148	33	7	1	0	0	464
16	0	3	4	13	103	295	195	34	4	1	0	0	652
17	0	3	13	7	102	295	194	59	10	3	1	0	687
18	0	6	5	16	74	218	206	55	16	3	0	1	600
19	0	4	5	22	58	120	103	61	10	5	1	0	389
20	0	0	0	1	42	89	101	43	14	6	1	1	298
21	0	1	0	8	34	61	43	27	8	8	4	0	194
22	0	1	0	0	14	41	25	18	5	3	0	0	107
23	0	0	1	6	10	17	17	14	7	3	0	0	75
24	0	1	1	0	4	7	7	5	10	1	0	0	35

7-19	1	88	75	133	962	2629	1969	552	103	19	5	1	6537
6-22	1	92	76	142	1090	2940	2292	711	163	46	10	2	7565
6-24	1	93	77	148	1104	2964	2316	730	180	50	10	2	7675
0-24	1	94	79	154	1122	3015	2389	787	206	65	10	3	7925

Channel 2 - Eastbound

09/09/2025	Vehicle Speeds (MPH)													
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+	TOTAL	
1	0	0	0	0	0	5	4	5	7	1	0	0	22	
2	0	0	0	0	1	0	3	4	2	4	1	1	16	
3	0	0	0	0	0	0	2	2	2	8	0	0	14	
4	0	0	0	0	0	2	2	3	4	0	0	0	11	
5	0	0	0	0	0	3	5	15	12	2	0	0	37	
6	0	0	0	0	1	12	30	29	13	4	0	0	89	
7	0	0	0	0	9	3	37	120	60	24	5	0	258	
8	0	2	0	4	54	158	226	54	18	3	0	0	519	
9	0	0	7	17	122	226	189	55	23	4	0	0	643	
10	0	11	9	16	59	181	185	49	8	1	0	0	519	
11	0	3	12	10	57	153	144	37	10	1	0	0	427	
12	0	1	0	2	76	172	133	27	6	5	1	0	423	
13	0	12	8	5	62	175	112	30	7	3	0	0	414	
14	0	2	0	6	41	151	126	51	20	3	0	0	400	
15	0	7	6	3	47	201	161	30	8	2	0	0	465	
16	0	0	5	24	77	258	171	57	6	2	0	0	600	
17	0	3	2	3	48	189	272	90	17	5	1	1	631	
18	0	1	0	1	80	231	265	77	20	3	0	0	678	
19	0	7	6	23	54	163	169	93	13	5	0	0	533	
20	0	1	1	4	59	92	101	43	19	5	0	0	325	
21	0	2	0	0	18	82	76	23	15	2	0	0	218	
22	0	1	0	18	18	29	41	27	11	8	1	1	155	
23	0	0	0	0	9	21	27	15	8	7	0	0	87	
24	0	1	0	2	2	6	11	9	0	5	1	0	37	

7-19	0	49	55	114	777	2258	2153	650	156	37	2	1	6252
6-22	0	53	56	145	875	2498	2491	803	225	57	3	2	7208
6-24	0	54	56	147	886	2525	2529	827	233	69	4	2	7332
0-24	0	54	56	147	888	2547	2575	885	273	88	5	3	7521

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

10/09/2025	Vehicle Classes														TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13		
1	20	2	0	0	0	0	0	0	2	0	0	1	0	25	
2	8	4	0	0	1	0	1	0	2	0	0	1	0	17	
3	6	6	0	0	0	0	0	0	4	0	1	0	0	17	
4	5	2	0	0	2	0	0	0	2	0	0	0	0	11	
5	27	4	2	0	1	0	0	0	1	0	4	0	0	39	
6	86	17	1	1	2	0	0	0	5	0	3	1	0	116	
7	330	46	2	2	1	0	0	1	3	0	7	5	0	397	
8	714	59	6	0	4	0	1	0	3	0	1	6	0	794	
9	596	86	1	1	3	0	0	1	6	0	9	7	0	710	
10	381	68	3	1	2	0	2	0	2	0	7	3	0	469	
11	313	44	1	4	6	0	3	2	2	0	7	8	0	390	
12	284	61	2	0	4	0	0	2	7	0	6	6	0	372	
13	316	56	1	4	4	0	3	1	5	0	3	6	0	399	
14	300	60	5	6	4	0	1	3	4	0	13	6	0	402	
15	338	66	5	0	8	0	2	2	7	0	13	5	0	446	
16	440	60	3	2	8	0	0	1	1	0	2	4	0	521	
17	496	62	1	0	2	0	0	0	2	0	7	7	0	577	
18	471	49	0	0	0	0	0	0	4	0	3	2	0	529	
19	331	40	1	0	0	0	0	0	1	0	2	6	0	381	
20	227	21	0	1	1	0	0	0	1	0	1	4	0	256	
21	158	21	0	0	1	0	0	0	1	0	0	2	0	183	
22	94	9	0	0	0	0	0	0	1	0	2	1	0	107	
23	60	5	0	0	1	1	1	0	2	0	1	1	0	72	
24	21	2	0	0	1	0	0	0	2	0	4	0	0	30	
7-19	4980	711	29	18	45	0	12	12	44	0	73	66	0	5990	
6-22	5789	808	31	21	48	0	12	13	50	0	83	78	0	6933	
6-24	5870	815	31	21	50	1	13	13	54	0	88	79	0	7035	
0-24	6022	850	34	22	56	1	14	13	70	0	96	82	0	7260	

Channel 2 - Eastbound

10/09/2025	Vehicle Classes														TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13		
1	13	1	0	0	1	0	1	0	0	0	1	0	0	17	
2	7	2	0	0	0	0	0	0	0	0	0	0	0	9	
3	6	1	0	0	0	1	0	0	1	0	2	0	0	11	
4	7	4	1	0	0	0	0	0	1	0	0	0	0	13	
5	16	5	0	0	2	0	0	0	5	0	5	1	0	34	
6	57	17	3	3	3	0	0	0	3	0	4	2	0	92	
7	201	38	1	0	5	0	1	0	7	0	7	6	0	266	
8	389	94	0	1	3	0	1	3	4	0	5	6	0	506	
9	528	111	1	0	4	0	1	4	4	0	5	12	0	670	
10	357	60	3	1	5	0	0	6	5	0	8	2	0	447	
11	271	59	2	1	11	0	1	1	7	0	8	4	0	365	
12	309	61	5	4	7	0	2	1	5	0	6	7	0	407	
13	313	61	1	0	6	1	2	0	8	1	3	2	0	398	
14	298	67	1	0	2	0	2	2	17	0	6	6	0	401	
15	393	61	2	3	6	0	1	1	4	0	7	7	0	485	
16	486	63	2	1	2	0	2	2	7	0	3	4	0	572	
17	551	61	0	0	2	0	0	0	3	0	4	5	0	626	
18	599	67	1	0	1	0	1	0	3	0	1	4	0	677	
19	487	46	2	0	2	0	0	0	2	0	1	2	0	542	
20	256	29	0	0	1	0	0	0	2	0	0	0	0	288	
21	155	14	0	0	0	0	0	1	0	1	3	0	0	174	
22	99	6	2	0	0	0	0	1	1	0	3	2	0	114	
23	76	8	0	0	0	0	0	0	2	0	1	0	0	87	
24	44	2	0	0	0	0	0	0	2	0	1	0	0	49	
7-19	4981	811	20	11	51	1	13	20	69	1	57	61	0	6096	
6-22	5692	898	23	11	57	1	14	22	79	2	70	69	0	6938	
6-24	5812	908	23	11	57	1	14	22	83	2	72	69	0	7074	
0-24	5918	938	27	14	63	2	15	22	93	2	84	72	0	7250	

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound

10/09/2025	Vehicle Speeds (MPH)													
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+	TOTAL	
1	0	0	0	0	3	4	5	4	7	2	0	0	25	
2	0	0	1	0	0	7	3	3	0	3	0	0	17	
3	0	0	0	0	0	4	6	4	0	3	0	0	17	
4	0	0	0	0	0	2	4	2	2	0	1	0	11	
5	0	0	0	0	2	5	12	10	5	5	0	0	39	
6	0	0	0	2	3	19	27	38	16	8	3	0	116	
7	0	0	0	5	23	112	147	78	29	3	0	0	397	
8	0	16	3	13	107	307	262	74	8	2	1	1	794	
9	0	4	22	25	99	336	177	39	7	1	0	0	710	
10	0	3	2	3	57	224	137	37	5	1	0	0	469	
11	0	3	5	10	77	174	96	21	4	0	0	0	390	
12	1	0	1	2	60	153	125	23	4	3	0	0	372	
13	0	0	1	3	48	187	120	34	5	1	0	0	399	
14	0	1	3	17	55	152	134	30	8	2	0	0	402	
15	0	0	2	4	73	190	145	25	4	3	0	0	446	
16	0	1	2	12	49	237	163	46	9	2	0	0	521	
17	0	2	0	8	103	236	175	38	13	2	0	0	577	
18	1	0	0	6	43	174	214	75	16	0	0	0	529	
19	0	1	1	4	35	123	144	58	12	1	1	1	381	
20	0	0	1	11	52	77	58	44	11	1	1	0	256	
21	0	0	0	8	30	54	53	26	9	3	0	0	183	
22	0	0	0	3	13	27	41	13	6	4	0	0	107	
23	0	0	1	0	6	12	32	8	12	1	0	0	72	
24	0	0	0	0	0	12	8	6	3	0	1	0	30	

7-19	2	31	42	107	806	2493	1892	500	95	18	2	2	5990
6-22	2	31	43	134	924	2763	2191	661	150	29	3	2	6933
6-24	2	31	44	134	930	2787	2231	675	165	30	4	2	7035
0-24	2	31	45	136	938	2828	2288	736	195	51	8	2	7260

Channel 2 - Eastbound

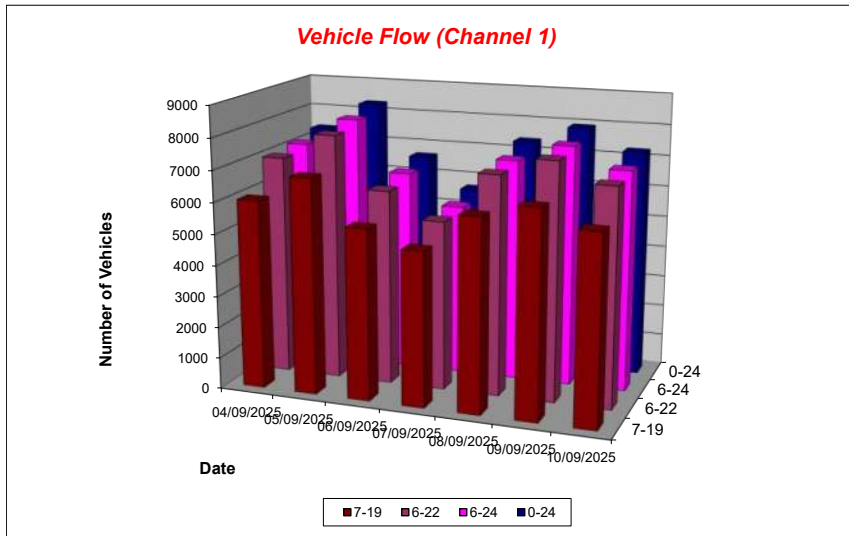
10/09/2025	Vehicle Speeds (MPH)													
Hr Ending	0-10	10-20	20-30	30-35	35-40	40-45	45-50	50-55	55-60	60-70	70-80	80+	TOTAL	
1	0	0	0	3	0	2	4	3	1	4	0	0	17	
2	0	0	0	0	0	2	3	2	1	1	0	0	9	
3	0	0	0	0	0	3	1	4	1	2	0	0	11	
4	0	0	0	0	0	1	4	3	4	1	0	0	13	
5	0	0	0	0	0	1	9	15	6	3	0	0	34	
6	0	0	0	0	3	16	33	27	9	4	0	0	92	
7	0	1	0	7	36	53	96	46	20	7	0	0	266	
8	0	1	29	13	49	164	180	48	18	4	0	0	506	
9	0	3	7	28	103	232	204	70	20	3	0	0	670	
10	0	0	1	5	34	154	165	68	19	1	0	0	447	
11	0	1	5	9	52	140	129	27	2	0	0	0	365	
12	0	0	1	15	48	151	157	32	2	1	0	0	407	
13	0	1	0	0	50	161	131	47	7	1	0	0	398	
14	0	0	1	9	49	142	163	24	11	2	0	0	401	
15	0	1	9	10	28	175	189	62	10	1	0	0	485	
16	0	0	0	3	36	221	212	72	23	5	0	0	572	
17	0	2	0	0	54	212	217	102	24	14	1	0	626	
18	0	2	3	13	55	225	241	112	20	6	0	0	677	
19	0	3	1	6	65	170	195	71	26	4	1	0	542	
20	1	2	0	2	25	62	110	68	12	6	0	0	288	
21	0	0	0	0	10	45	66	30	15	5	2	1	174	
22	0	0	0	0	5	26	39	20	19	5	0	0	114	
23	0	0	0	0	6	18	34	13	12	4	0	0	87	
24	0	0	0	0	3	11	14	12	6	3	0	0	49	

7-19	0	14	57	111	623	2147	2183	735	182	42	2	0	6096
6-22	1	17	57	120	699	2333	2494	899	248	65	4	1	6938
6-24	1	17	57	120	708	2362	2542	924	266	72	4	1	7074
0-24	1	17	57	123	711	2387	2596	978	288	87	4	1	7250

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound										Vehicle Flow		Week 1
Hr Ending	04/09/2025 Thursday	05/09/2025 Friday	06/09/2025 Saturday	07/09/2025 Sunday	08/09/2025 Monday	09/09/2025 Tuesday	10/09/2025 Wednesday	Weekday Average	Average			
1	20	38	49	62	14	18	25	23	32			
2	17	17	17	31	15	19	17	17	19			
3	16	18	17	15	12	21	17	17	17			
4	20	16	16	17	29	19	11	19	18			
5	40	53	31	21	61	46	39	48	42			
6	102	88	70	35	136	127	116	114	96			
7	390	322	117	73	388	429	397	385	302			
8	758	591	219	133	788	789	794	744	582			
9	617	608	280	214	652	669	710	651	536			
10	457	532	384	435	458	530	469	489	466			
11	454	527	531	490	451	460	390	456	472			
12	400	521	558	591	427	443	372	433	473			
13	445	497	561	584	401	390	399	426	468			
14	425	580	554	518	446	464	402	463	484			
15	460	646	510	469	440	464	446	491	491			
16	556	651	542	412	582	652	521	592	559			
17	602	693	517	399	616	687	577	635	584			
18	514	590	403	374	505	600	529	548	502			
19	350	435	398	307	359	389	381	383	374			
20	281	295	286	197	229	298	256	272	263			
21	173	196	213	139	157	194	183	181	179			
22	150	178	161	80	110	107	107	130	128			
23	94	136	108	47	69	75	72	89	86			
24	36	74	99	20	25	35	30	40	46			
7-19	6038	6871	5457	4926	6125	6537	5990	6312	5992			
6-22	7032	7862	6234	5415	7009	7565	6933	7280	6864			
6-24	7162	8072	6441	5482	7103	7675	7036	7409	6996			
0-24	7377	8302	6641	5663	7370	7925	7260	7647	7220			



Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound					Average Speed		Week 1	
Hr Ending	04/09/2025 Thursday	05/09/2025 Friday	06/09/2025 Saturday	07/09/2025 Sunday	08/09/2025 Monday	09/09/2025 Tuesday	10/09/2025 Wednesday	
1	48.4	51.4	47.5	47.6	50.9	47.9	49.8	
2	49.2	50.2	45.7	48.5	48.0	50.7	48.3	
3	53.0	50.4	48.2	52.8	53.3	45.9	50.1	
4	44.0	48.6	48.9	48.8	49.5	49.2	51.2	
5	49.9	47.8	48.7	49.4	49.0	49.4	51.4	
6	48.5	50.2	48.8	49.3	49.9	48.7	50.8	
7	47.3	47.5	49.4	50.0	47.9	47.0	47.2	
8	44.0	45.6	46.3	48.4	43.8	43.0	43.9	
9	44.4	43.7	46.5	46.8	44.5	44.7	42.8	
10	44.0	43.0	45.4	45.5	44.2	43.2	44.0	
11	42.8	42.0	45.0	43.8	43.4	42.8	42.7	
12	44.4	41.5	44.1	43.7	43.9	42.4	44.3	
13	43.2	42.7	44.5	43.4	44.4	44.2	44.4	
14	42.8	44.1	45.0	38.6	43.6	43.8	44.1	
15	43.7	44.6	45.3	40.3	44.3	44.2	44.0	
16	43.3	44.0	45.1	44.0	43.6	43.3	44.5	
17	43.7	44.8	45.5	45.6	44.4	43.8	44.0	
18	46.5	44.9	46.2	46.0	46.2	44.5	45.9	
19	47.1	46.2	46.1	47.7	46.7	44.3	45.9	
20	46.9	46.4	47.7	46.6	46.7	46.3	44.7	
21	47.6	43.9	45.5	46.1	46.9	45.9	45.3	
22	46.7	45.0	46.3	47.0	47.3	45.7	46.4	
23	45.7	45.4	47.7	49.5	47.2	46.0	48.2	
24	50.1	48.4	47.8	51.9	48.0	48.4	48.2	
10-12	43.6	41.8	44.5	43.8	43.6	42.6	43.5	
14-16	43.5	44.3	45.2	42.0	43.9	43.7	44.3	
0-24	44.7	44.4	45.6	44.4	44.9	44.2	44.7	
					Mean (ALL)		44.7	
					Weekday Inter-Peak		43.5	
Channel 1 - Westbound					85th Percentile			

Channel 1 - Westbound					85th Percentile		
Hr Ending	04/09/2025 Thursday	05/09/2025 Friday	06/09/2025 Saturday	07/09/2025 Sunday	08/09/2025 Monday	09/09/2025 Tuesday	10/09/2025 Wednesday
1	55.3	62.1	57.6	55.3	58.2	55.9	57.7
2	58.2	56.3	55.6	55.8	57.2	54.7	59.2
3	60.8	57.0	55.6	60.5	60.9	58.8	58.1
4	56.7	55.6	57.4	57.0	54.8	55.3	59.8
5	57.3	55.9	58.0	58.1	56.0	59.4	59.3
6	55.5	58.1	57.6	56.7	55.9	56.2	59.3
7	53.8	53.7	55.5	58.8	54.0	53.6	53.1
8	49.9	50.6	53.6	55.2	49.4	52.8	50.8
9	50.1	50.7	53.7	52.9	49.9	50.7	49.1
10	49.2	48.7	51.1	51.4	49.8	49.1	49.4
11	48.5	48.0	50.7	50.0	48.9	48.7	48.7
12	49.4	48.9	49.1	49.1	48.9	49.5	50.0
13	49.5	49.1	51.0	49.4	50.8	49.5	49.5
14	48.9	49.7	50.5	46.7	49.1	49.7	50.3
15	49.3	50.1	51.4	49.7	50.2	49.3	49.1
16	50.2	49.0	51.9	49.4	49.2	48.8	50.0
17	51.0	50.0	50.8	51.3	49.6	50.1	49.5
18	51.6	50.9	51.8	52.7	52.1	51.4	51.3
19	53.2	52.0	52.5	54.5	52.1	52.0	52.0
20	53.1	52.7	53.4	53.3	54.6	53.2	52.0
21	55.8	51.8	51.1	52.8	53.4	55.0	52.2
22	53.5	51.4	53.8	53.9	55.9	52.8	53.5
23	52.3	52.3	54.8	57.4	54.8	54.4	55.5
24	59.0	57.3	55.3	59.5	55.3	57.9	56.3
10-12	49.1	48.5	49.9	49.6	48.9	49.1	49.4
14-16	49.9	49.5	51.7	50.0	49.6	49.1	49.6
0-24	51.2	50.8	51.9	51.8	51.0	51.3	51.0
					85th %ile (ALL)		51.3
					Weekday Inter-Peak		49.4

Produced by Road Data Services Ltd.

Vehicle Flow (Channel 2)

Date	7-19	6-22	6-24	0-24
04/09/2025	6300	7400	7800	8000
05/09/2025	6600	7600	8000	8200
06/09/2025	5100	6000	6600	7100
07/09/2025	4200	5200	5600	6000
08/09/2025	5700	6800	7200	7600
09/09/2025	5800	7000	7400	7800
10/09/2025	5500	6600	7000	7400

Produced by Road Data Services Ltd.

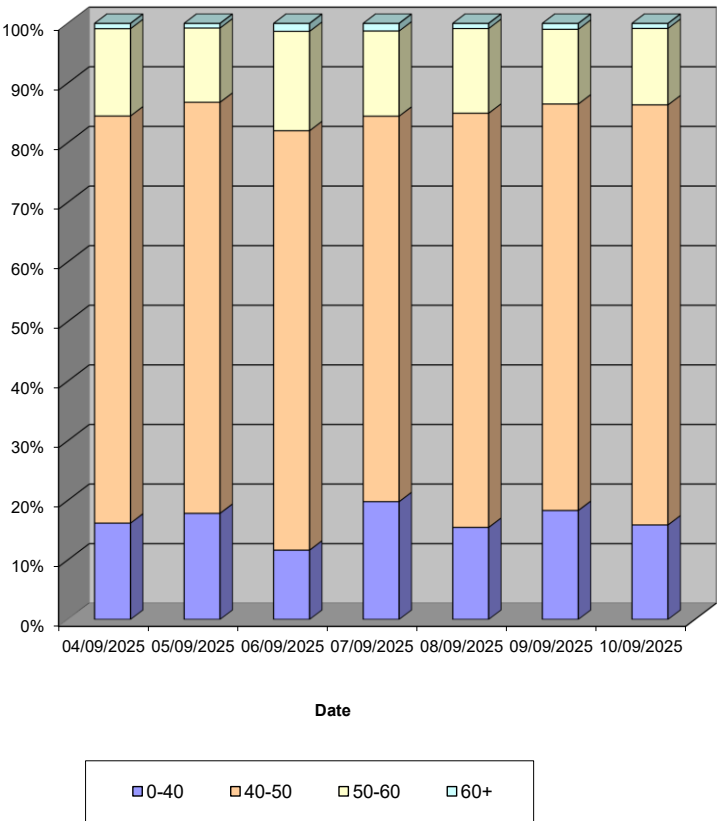
	04/09/2025	05/09/2025	06/09/2025	07/09/2025	08/09/2025	09/09/2025	10/09/2025
Hr Ending	Thursday	Friday	Saturday	Sunday	Monday	Tuesday	Wednesday
1	57.7	64.2	60.4	56.8	63.4	58.4	62.1
2	57.3	62.2	63.3	58.6	59.9	68.5	57.1
3	64.0	67.2	63.5	54.4	65.1	64.2	59.4
4	57.3	56.8	62.3	63.3	60.3	57.6	59.4
5	58.3	59.0	56.5	55.0	59.6	58.9	58.5
6	54.7	57.5	57.4	54.8	57.3	57.2	55.6
7	53.9	57.3	57.8	56.7	55.5	54.7	53.8
8	50.8	52.0	58.1	60.5	51.1	51.4	51.7
9	50.7	50.9	53.0	55.5	50.4	50.3	50.7
10	49.0	50.5	51.9	52.7	51.5	51.2	51.6
11	47.2	49.3	49.5	50.7	50.4	50.7	49.5
12	50.1	49.4	49.9	50.1	49.7	50.1	49.5
13	51.1	49.9	51.2	50.2	50.1	50.7	50.5
14	49.6	50.2	51.1	47.3	48.6	51.8	50.2
15	49.1	49.2	51.3	49.3	50.5	50.6	51.2
16	49.7	51.6	52.0	51.1	50.6	49.7	51.5
17	51.2	50.4	51.2	53.3	52.0	52.3	52.6
18	53.2	52.3	52.7	54.1	52.1	50.8	52.1
19	53.0	52.6	54.4	55.4	52.4	52.5	52.3
20	56.8	52.8	53.8	54.5	56.3	52.4	54.0
21	54.8	52.7	52.1	53.4	55.2	52.4	56.0
22	56.6	54.8	53.8	55.8	56.2	56.3	56.5
23	59.0	55.2	55.7	59.9	59.0	56.5	55.5
24	58.5	58.8	57.8	59.3	59.7	59.9	56.3
10-12	48.7	49.5	49.7	50.4	50.1	50.4	49.5
14-16	49.5	50.5	51.7	50.3	50.5	50.1	51.4
0-24	51.9	51.9	52.8	52.7	52.2	51.9	52.2
85th %ile (ALL)						52.2	
Weekday Inter-Peak						50.2	

Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound		Speed Summary					Week 1
Speed (MPH)	04/09/2025 Thursday	05/09/2025 Friday	06/09/2025 Saturday	07/09/2025 Sunday	08/09/2025 Monday	09/09/2025 Tuesday	10/09/2025 Wednesday
0-40	1193	1479	773	1120	1139	1450	1152
40-50	5039	5725	4673	3662	5121	5404	5116
50-60	1080	1034	1107	809	1047	993	931
60+	65	64	88	72	63	78	61
TOTAL	7377	8302	6641	5663	7370	7925	7260

Speed Summary (MPH)

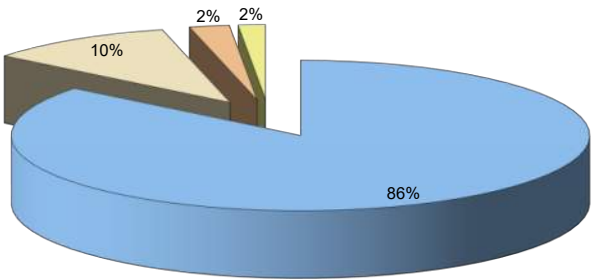


Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 1 - Westbound			Vehicle Class		Week 1
Classes	Car / LGV / Caravan - 1	MGV - 2	OGV1 / Bus - 3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13
Day / Time					
04/09/2025					
7-19	5006	728	149	155	6038
6-22	5876	804	171	181	7032
6-24	5981	821	174	186	7162
0-24	6124	857	181	215	6947
05/09/2025					
7-19	5777	780	165	149	6871
6-22	6640	872	179	171	7862
6-24	6815	896	186	175	8072
0-24	6972	924	198	208	8302
06/09/2025					
7-19	4932	381	84	60	5457
6-22	5635	440	94	65	6234
6-24	5832	447	95	67	6441
0-24	5986	469	104	82	6641
07/09/2025					
7-19	4498	339	56	33	4926
6-22	4943	372	61	39	5415
6-24	5001	378	63	40	5482
0-24	5161	388	66	48	5663
08/09/2025					
7-19	5110	736	133	146	6125
6-22	5866	821	150	172	7009
6-24	5940	831	154	178	7103
0-24	6137	863	168	202	7370
09/09/2025					
7-19	5399	791	175	172	6537
6-22	6276	889	203	197	7565
6-24	6369	894	204	208	7675
0-24	6540	923	222	240	7925
10/09/2025					
7-19	4980	711	152	147	5990
6-22	5789	808	169	167	6933
6-24	5870	815	174	176	7035
0-24	6022	850	187	201	7260
Average					
7-19	5100	638	131	123	5992
6-22	5861	715	147	142	6864
6-24	5973	726	150	147	6996
0-24	6135	753	161	109	7158

Total Vehicle Class Distribution

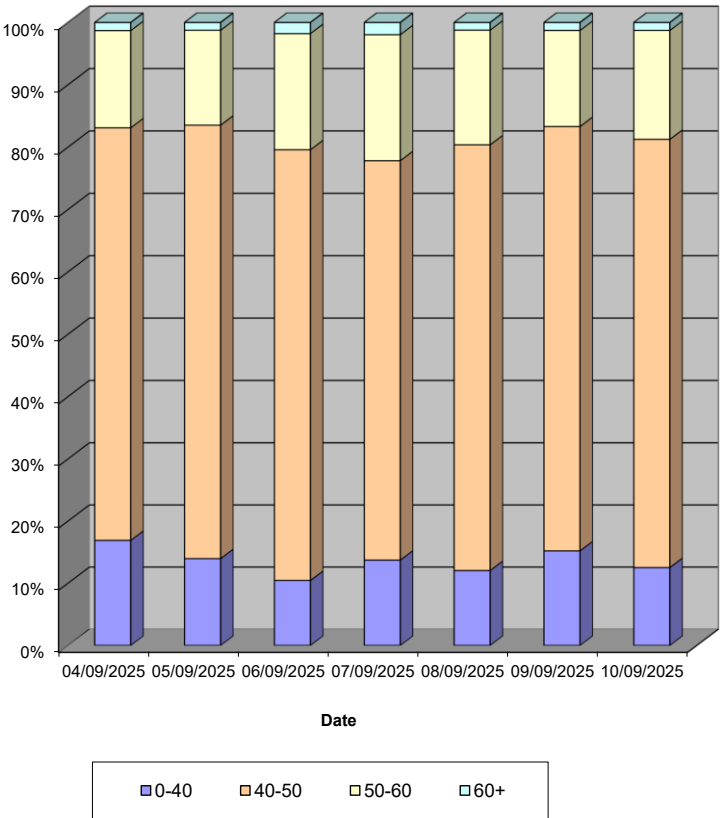


Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 2 - Eastbound		Speed Summary						Week 1
Speed (MPH)	04/09/2025 Thursday	05/09/2025 Friday	06/09/2025 Saturday	07/09/2025 Sunday	08/09/2025 Monday	09/09/2025 Tuesday	10/09/2025 Wednesday	
0-40	1251	1116	669	751	868	1145	909	
40-50	4898	5553	4419	3504	4916	5122	4983	
50-60	1153	1215	1190	1104	1323	1158	1266	
60+	96	99	114	107	88	96	92	
TOTAL	7398	7983	6392	5466	7195	7521	7250	

Speed Summary (MPH)

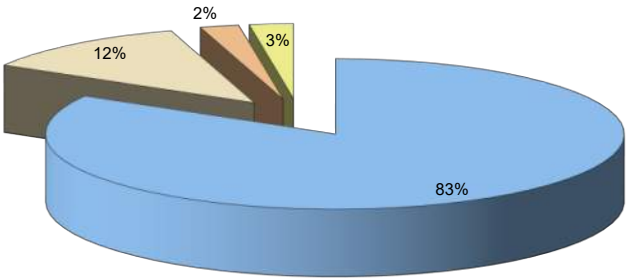


Langho ATC, A59 Longsight Lane

Produced by Road Data Services Ltd.

Channel 2 - Eastbound		Vehicle Class				Week 1
Classes	Car / LGV / Caravan - 1	MGV - 2	OGV1 / Bus - 3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13	
Day / Time						
04/09/2025						
7-19	5068	819	172	151	6210	
6-22	5803	915	188	173	7079	
6-24	5916	923	192	184	7215	
0-24	6021	963	204	210	7398	
05/09/2025						
7-19	5438	866	140	160	6604	
6-22	6310	968	152	177	7607	
6-24	6470	986	154	182	7792	
0-24	6590	1018	170	205	7983	
06/09/2025						
7-19	4650	463	79	63	5255	
6-22	5295	527	87	70	5979	
6-24	5504	550	88	74	6216	
0-24	5633	569	94	96	6392	
07/09/2025						
7-19	4110	375	57	22	4564	
6-22	4672	425	63	26	5186	
6-24	4751	432	63	29	5275	
0-24	4913	451	64	38	5466	
08/09/2025						
7-19	4939	850	145	160	6094	
6-22	5590	945	158	189	6882	
6-24	5734	961	162	199	7006	
0-24	5821	984	172	218	7195	
09/09/2025						
7-19	5099	831	158	164	6252	
6-22	5910	932	171	195	7208	
6-24	6007	947	176	202	7332	
0-24	6123	980	188	230	7521	
10/09/2025						
7-19	4981	811	146	158	6096	
6-22	5692	898	164	184	6938	
6-24	5812	908	164	190	7074	
0-24	5918	938	179	215	7250	
Average						
7-19	4898	716	128	125	5868	
6-22	5610	801	140	145	6697	
6-24	5735	815	143	151	6844	
0-24	5860	843	153	173	7029	

Total Vehicle Class Distribution



HTASoC Appendix 3: September 2025 Pedestrian Survey at the A59

Langho
Thursday 4th September 2025
Pedestrians

06:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	4
C	0	0		0
D	0	3	0	

07:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	2
C	0	0		0
D	0	3	0	

08:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	0
C	0	0		0
D	0	0	0	

09:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	1
C	0	0		0
D	0	0	0	

10:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	2
C	0	0		0
D	0	1	0	

11:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	0
C	0	0		0
D	0	0	0	

12:00				
Origin	Destination			
A	A	B	C	D
A		0	0	2
B	0		0	0
C	0	0		0
D	0	0	0	

13:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	1
C	0	0		0
D	0	0	0	

14:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	3
C	0	0		0
D	0	2	0	

15:00				
Origin	Destination			
A	A	B	C	D
A		0	1	0
B	0		0	3
C	0	0		0
D	0	2	0	

16:00				
Origin	Destination			
A	A	B	C	D
A		0	1	0
B	0		0	1
C	0	0		0
D	0	2	0	

17:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	1
C	0	0		0
D	0	2	0	

18:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	3
C	0	0		0
D	0	1	0	

19:00				
Origin	Destination			
A	A	B	C	D
A		0	0	0
B	0		0	1
C	0	0		0
D	0	1	0	

Langho
Saturday 6th September 2025
Pedestrians

06:00				
Origin	Destination			
A	B	C	D	
A	0	0	0	0
B	0	0	0	1
C	0	0	0	0
D	0	0	0	0

07:00				
Origin	Destination			
A	B	C	D	
A	0	0	0	0
B	0	0	0	0
C	0	0	0	0
D	0	2	0	0

08:00				
Origin	Destination			
A	B	C	D	
A	1	2	0	0
B	0	0	2	0
C	0	0	0	0
D	0	0	0	0

09:00				
Origin	Destination			
A	B	C	D	
A	0	1	0	0
B	0	0	1	0
C	0	0	0	0
D	0	0	0	0

10:00				
Origin	Destination			
A	B	C	D	
A	0	0	0	0
B	0	0	1	0
C	2	0	0	0
D	0	0	0	0

11:00				
Origin	Destination			
A	B	C	D	
A	0	2	0	0
B	0	0	2	0
C	1	0	0	0
D	0	2	0	0

12:00				
Origin	Destination			
A	B	C	D	
A	0	0	0	0
B	0	1	0	0
C	0	0	0	0
D	0	0	0	0

13:00				
Origin	Destination			
A	B	C	D	
A	0	1	0	0
B	0	0	1	0
C	0	0	0	0
D	0	2	1	0

14:00				
Origin	Destination			
A	B	C	D	
A	0	1	0	0
B	0	0	3	0
C	1	0	0	0
D	0	0	0	0

15:00				
Origin	Destination			
A	B	C	D	
A	0	0	0	0
B	0	0	0	0
C	0	1	0	0
D	0	0	0	0

16:00				
Origin	Destination			
A	B	C	D	
A	0	3	0	0
B	0	0	1	0
C	2	0	0	0
D	0	0	0	0

17:00				
Origin	Destination			
A	B	C	D	
A	0	0	0	0
B	0	0	1	0
C	1	0	0	0
D	0	0	0	0

18:00				
Origin	Destination			
A	B	C	D	
A	0	0	0	0
B	0	0	2	0
C	2	0	0	0
D	0	2	0	0

19:00				
Origin	Destination			
A	B	C	D	
A	0	0	0	0
B	0	0	0	0
C	0	0	0	0
D	0	0	0	0

Langho
September 2025
Pedestrians



HTASoC Appendix 4: Railway Car Parks Surveys

Land South of Longsight Road, Langho

Technical Note 10: Railway Car Parks Surveys

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1.0 Introduction

- 1.1 This Technical Note, prepared by Tetra Tech on behalf of Hallam Land Management Limited, supports an outline planning application for a proposed residential development on Land off Longsight Road, north of Langho, Lancashire.
- 1.2 The development proposals include a 40 space car park at Langho. The purpose of the car park is to:
 - a) Allow people who want to use the railway from Langho to park their vehicle;
 - b) Accommodate any demand for rail related parking that might otherwise be parking at other less convenient rail stations (reducing mileage);
 - c) Accommodate any demand for rail journey parking which is currently being suppressed due to lack of parking availability;
 - d) Create a facility which is Vision Led, and which will accommodate future demand for rail journey related parking that may arise over coming years and decades through wider strategies towards promoting sustainable travel i.e. building for the future;
 - e) Provide blue badge parking spaces and Electric Vehicle charging points for present and future needs.
- 1.3 In order to quantify the likely present day demand for parking, surveys were undertaken at nearby railway stations. Those were Clitheroe, Whalley, Ramsgreave and Wilpshire and Langho.
- 1.4 Two surveys were conducted. The first survey was conducted on 29th and 30th of October 2025, during a half term holiday week. The second survey was conducted on the 11th November 2025 by Tetra Tech. Both sets of surveys were conducted on mid-week days, focusing on morning peak hour periods. The purpose was to count whether existing parking provisions at or near the stations were full at that time, to the extent that a lack of parking availability may be deterring commuters who may wish to use rail if parking was available.

- 1.5 The car park occupancy counts for the half term observations and the term time observations are presented in **Appendix A & B** respectively.

2.0 Summary of Surveys and Observations

Clitheroe Rail Station

Parking Availability

- 2.1 In Clitheroe, there is no dedicated station car park provided for rail passengers. There are three car parks within the vicinity of the station. These are Market Car Park, Railway View and Chester Avenue.
- 2.2 Market Car Park provides 62 pay and display car park spaces and has 6 disability parking spaces. The car park charges £11.10 for up to 10 hours of parking, which is the band which would likely be used by a rail passenger commuting to work. The car park is located approximately 150m away from the railway station.
- 2.3 The Railway View car park contains 68 pay and display spaces, 8 disabled bays, 4 EV bays and 2 cycle spaces. This car park also has a parking charge of £11.10 for up to 10 hours of parking. The car park is located approximately 126m from the railway station.
- 2.4 Chester Avenue Car Park has 103 pay and display parking spaces, four disabled bays and 10 Electric Vehicle bays. The car park charges £3.50 for up to 10 hours of parking. The car park is located approximately 115m away from the railway.

Survey Summary

- 2.5 During the school half-term survey, the surveyor observed that at 07:55am, the Market Car Park only had two vehicles parked in standard parking bays. At 10:45am, 23 standard parking bays and two disabled bays were occupied.
- 2.6 At the Railway View Car Park, at 08:00am the surveyor observed that 5 standard parking bays and 1 electric vehicle parking bay were occupied. At 10:45am, 56 standard parking bays, 4 disabled parking bays and two electric vehicle bays were occupied.
- 2.7 At the Chester Avenue Car Park, the surveyor observed that at 08:08am, 30 standard parking bays and one electric vehicle bay were occupied. There were 12 vehicles observed parking on-street. At 10:50am, all 103 standard parking bays were occupied, with 12 vehicles parked on the street.
- 2.8 As the Chester Avenue Car Park was full by late morning, a lack of lower priced parking may be deterring train use for journeys mid-day. For a parking stay of over 3 hours at the Market and at the Railway View car parks, the charge is the full day £11.10 fee.
- 2.9 Given that Chester Avenue became full by 10am and the ample observed parking capacity remaining across the other car parks after 10:00am, the survey was not repeated during school term times.

Conclusions

- 2.10 The results of the survey show that if a rail commuter wanted to park their vehicle near to Clitheroe Railway Station in a standard space, a blue badge space or in an electrical vehicle charging bay, they are able to do so, albeit at the cost of a minimum of £3.50 per day. Lack of parking is not deterring morning commuters using the train from Clitheroe, although the £3.50 charge may be.
- 2.11 Given that the Chester Avenue Car Park was observed to reach capacity for standard vehicle spaces by late morning, and that alternative parking for more than 3 hours costs £11.10, mid-day journeys by rail may be deterred. The proposed car park provides the option for Clitheroe residents to drive a few miles to a free car park at Langho and catch a train, rather than drive for the full journey.

Whalley Rail station

Parking Availability

- 2.12 At Whalley Railway Station, there are 17 standard parking bays provided on the eastern side of the railway line. The car parking spaces are provided for rail passengers only, with no charge associated for parking or time limit restrictions. There are no blue badge parking bays at Whalley station.
- 2.13 **Appendix A** states that there are no cycle parking facilities at Whalley, however there are 2 Sheffield Stands, which provide 4 cycle parking spaces.
- 2.14 On-street parking was also observed by the surveyors along The Sidings Road. The length of the road on The Sidings, where parking is permitted measures approximately 115m, equating to space for 19 vehicles to park on street.

Survey Summary

- 2.15 During the school half term surveys, the surveyor undertook observations at Whalley station at 08:35am and 11:20am.
- 2.16 At 08:35am, the surveyor observed that 10 standard parking bays were occupied, with 10 vehicles parked on the street. There was no observed cycle parking.
- 2.17 At 11:20am, the surveyor observed 14 of the 17 standard parking bays were occupied, also with 10 vehicles parked on street. Again, there was no observed cycle parking.
- 2.18 During the school term time surveys, the survey undertook observations at Whalley Station at 08:01am, 09:42am and 10:44am.
- 2.19 At 08:01am, the surveyor observed 16 standard parking bays occupied, with 13 vehicles parked on street.
- 2.20 At 09:42am, the surveyor observed all 17 of the standard parking bays occupied, with 17 vehicles parked on street.
- 2.21 At 10:44am, all 17 of the standard parking bays were still occupied, with 15 vehicles parked on street.
- 2.22 Within all three observations, there were no cycles observed to be parked at the station.

Conclusions

- 2.23 At Whalley Railway Station, there are 17 formalised, standard parking bays for rail users. There are two Sheffield Stands, which provide parking for four cyclists. There is no provision for blue badge parking or Electric Vehicle parking.
- 2.24 Within the half term survey, there were 7 standard parking bays available at 08:35am, and 3 available at 11:20am.
- 2.25 In contrast, during the school term time surveys, the car park only had 1 available standard parking bay at 08:01am and was observed to be fully occupied in the subsequent two observations at 09:42am and 10:44am. From this, it is clear that the facilities are effectively full. Commuters or mid-day travellers who are familiar with the area, may be deterred from using rail services from Whalley, due to lack of parking availability. The “already full” situation also offers no scope to promote mode shift from car to rail in the future.
- 2.26 Moreover, due to lack of infrastructure, it can be concluded that vehicle drivers who require an accessible parking space, or Electric Vehicle charging cannot use the station.

Ramsgreave and Wilpshire Rail Station

Parking Availability

- 2.27 At Ramsgreave and Wilpshire Railway Station, there are 4 standard parking bays provided in a small car park on the eastern side of the railway line. In addition, there is one blue badge parking space.
- 2.28 The car parking spaces are provided for rail passengers only, with no charge associated for parking or time limit restrictions.
- 2.29 In addition, there are nine Long Stay – Commuter Only parking bays provided in the Co-Op car park, which are free of charge to railway users. These parking spaces are located immediately to the north of the Station Car Park.
- 2.30 The station car park is located to east of the southbound rail platform, with direct access from the car park to the stations via a ramped bridge. The Co-Op commuter car park is approximately a 50 metre walk to the station access.
- 2.31 There is no provision for Electric Vehicle charging at either of these car parks.
- 2.32 There are two Sheffield Stands, which provide cycle parking provision for four cycles.

Survey Summary

- 2.33 During the school half term survey, the surveyor undertook observations at Ramsgreave and Wilpshire Station Car Park and the Co-Op Commuter car park at 07:47am and 10:41am.
- 2.34 At 07:47am, the surveyor observed that 3 standard parking bays were occupied. There was no observed cycle parking. Within the Co-Op Commuter Car Park, 7 standard parking bays were occupied. There were 3 spaces available.

- 2.35 At 10:41am, at the Station car park, the surveyor observed 3 of the standard parking bays were occupied. At this time, all nine of the standard parking bays within the Co-Op commuter car park were occupied. There was 1 available space and again, there was no observed cycle parking.
- 2.36 During the school term time surveys, the surveyor undertook observations at Ramsgreave and Wilpshire Station Car Park and the Co-Op Commuter car park at 06:45am and 09:08am and 10:24am.
- 2.37 At 06:45am, the surveyor observed that 2 standard parking bays were occupied in the Station Car Park. There was no observed cycle parking. Within the Co-Op Commuter Car Park, 3 standard parking bays were occupied.
- 2.38 At 09:08am, the surveyor observed that 3 standard parking bays were occupied within the Station Car Park. There was no observed cycle parking. Within the Co-Op Commuter Car Park, all 9 standard parking bays were occupied. There was one space available.
- 2.39 At 10:24am, the surveyor observed 3 standard parking bays were occupied within the Station Car Park. There was no observed cycle parking. Within the Co-Op Commuter Car Park, all 9 standard parking bays remained occupied.

Conclusions

- 2.40 Between the Station car park and the Co-Op Commuter car parking bays, there are 13 standard parking bays, one blue badge parking bay and two Sheffield Stands, which provide parking for four cyclists.
- 2.41 The survey results show that within all observations, in both the school half term and the school term time surveys, one space within the Station Car Park remained unoccupied. In both the surveys, it can be seen that following typical morning commuter trains departed (i.e. the observations made after 9am) the Co-Op Commuter Long Stay bays were fully occupied.
- 2.42 From this, it is clear that the facilities are effectively full. Commuters or mid-day travellers who are familiar with the area may be deterred from using rail services from Ramsgreave and Wilpshire, due to lack of parking availability. The “effectively already full” situation also offers no scope to promote mode shift from car to rail in the future.
- 2.43 Due to lack of infrastructure, it can be concluded that vehicle drivers who require an accessible parking space, or Electric Vehicle charging may currently be deterred from using the station.

Langho Rail Station

Parking Availability

- 2.44 Lango Railway Station does not provide any dedicated parking facilities for rail passengers. Up until one month before the first survey, parking was available through a temporary lease arrangement which identified car parking spaces in the Pritiraj Bar & Indian Dining restaurant car park off Whalley Road. That car park is located approximately 100m south of the railway station. The first survey had anticipated that would still be in place, but when attending, it was noted that a sign had been erected stating that the car park is no longer a Park and Ride facility and therefore is no longer available to rail users as of 30/09/2025.



- 2.45 That car park had provided 38 standard parking bays and two blue badge parking bays. There was no provision for cyclists or electric vehicles within the car park. As that car park is no longer available, the current situation is that there is no dedicated railway car park, no blue badge parking bays and no Electrical Vehicle charging facilities.
- 2.46 The change in status of the car park resulted in a change in methodology between the two surveys. In the mid-term surveys the survey recorded spot counts of parking, i.e. the same approach taken at the other stations.
- 2.47 For the second survey, when it was known that rail related parking was not permitted in the Restaurant car park, the surveyor still counted parking there, but additionally also counted parking on Whinney Lane and the numbers of persons walking down Olive Bank towards the rail station, (excluding dog walkers). Site observations and survey outcomes are attached in **Appendix C**.

Parking Survey Summary

- 2.48 Initial observations during the half term survey undertaken 30th October 2025 showed that there was ample parking availability within the Restaurant car park, although the agreement for rail travellers to park there had ceased. The surveyor observed just 2 vehicles parked in standard parking bays and 1 occupied blue badge bay at 07:57am, and 3 vehicles parked in standard parking bays and 1 blue badge bay occupied at 10:55am.
- 2.49 The surveyor also observed 7 cars parked on street at 07:51am, and 9 cars parked on street at 10:55am.

- 2.50 The results of the survey are contained in **Appendix A**.
- 2.51 Given that the first survey was a simple car park occupancy spot count, it did not inform the question of whether those parked vehicles were associated with railway travel or other town centre uses.
- 2.52 A second survey was conducted on 11th November 2025 which undertook a count of vehicles parking in the Restaurant car park, on Whinney Lane and near-by on Whalley Road. In addition, the survey counted the number of pedestrians who walked towards the rail station, and separately identifying the number of those who had first parked a vehicle. The results are contained in **Appendix B and C**.
- 2.53 The intention of the survey was to identify likely railway commuters and it was noted that pedestrians observed walking down Olive Bank would either be:
- a) Walking to the railway station;
 - b) Walking to residential properties; and
 - c) Walking on the PRow to the field on the other side of the railway.
- 2.54 Given the times of the observations and the heavy rain on the survey date, it is considered that Options B and C are unlikely. In any event, dog walkers numbers were identified separately.
- 2.55 In order to capture likely demand for rail journeys, the surveyor was present for 30 minutes before the 07:31am train to Rochdale, and remained at the site until 07:50am, 7 minutes after the 07:43am train to Clitheroe.
- 2.56 For the survey period which captured the 07:31am and 07:43am trains, it was observed that 5 vehicles parked up and their occupants walked down Olive Bank towards the railway (4 vehicles parked in the restaurant car park, 1 parked on Whinney Lane). They may not have been aware of the recent change to remove rail related parking from that car park.
- 2.57 Within this period, a vehicle was observed to drive into and immediately then back out of Olive Bank, suggesting a possible drop-off at the station.
- 2.58 The surveyor also observed a further 15 pedestrians – 13 potential commuters and two dog walkers – who were observed to walk down Olive Bank.
- 2.59 Those 13 potential commuters did not park within the Car Park or Whinney Lane, and it was not possible to tell whether they had originated from residential properties, or if they had parked on street, further away from the station.
- 2.60 The survey observations show a clear need for at least 5 vehicle parking spaces, and up to a potential of 18 spaces for the 07:31am and 07:43am trains.
- 2.61 A second visit was undertaken on the same morning, which captured pedestrians and parking between 08:20-08:50am, which cover two trains at 08:32am (to Rochdale) and 08:48am (to Clitheroe).
- 2.62 Within this time period, 1 vehicle was observed to park on Whinney Lane and the occupant walk via Olive Bank towards the station. Another vehicle momentarily parked in the Restaurant car park and dropped off a potential commuter who walked down Olive Bank towards the station.

- 2.63 An additional 6 pedestrians were observed to walk down Olive Bank towards the station, however their origin is unknown, and therefore it is unknown if they had a vehicle parked further afield.
- 2.64 The second set of observations show a clear need for at least two vehicle parking spaces, and potential for up to eight parking spaces.

Conclusions

- 2.65 The Conclusions differ from those at the other rail stations, principally because there is currently no dedicated parking, and so there are no standard or disabled spaces, no electric charging spaces and no cycle spaces at the Langho station. Observations in two periods before train services recorded six cars parking and occupants walking to the station plus a further 19 pedestrians walking towards the station, some of whom may have parked on street.
- 2.66 It is clear that there is a demand for rail travel related parking in Langho. The absence of parking is likely to be deterring rail use. Moreover, the lack of infrastructure must also result in any vehicle drivers who require an accessible parking space, or Electric Vehicle charging, being deterred from using the station.

3.0 Conclusion

- 3.1 The development proposes to provide a 40 space car park dedicated to rail users at Langho. The purpose of the car park is to:
- a) Allow people who want to use the railway from Langho to park their vehicle; (enabling and encouraging rail use)
 - b) Accommodate any demand for rail related parking at Langho which might currently be parking at other less convenient rail stations; (i.e reduce mileage)
 - c) Accommodate any demand for rail journey parking which is currently being suppressed due to lack of parking availability; (enable mode shift to rail use)
 - d) Create a facility which is Vision led and which will accommodate future parking demand for rail journey related parking as may arise over coming years and decades through wider strategies towards promoting sustainable travel. (accommodate future rail travel demand)
 - e) Provide blue badge parking spaces and Electric Vehicle charging points for present and future needs. (provide these currently lacking facilities to enable rail use for the disabled and EV user)
- 3.2 Surveys were undertaken to establish both the demand for, and availability of parking, at and near rail stations (particularly for commuters). The survey results also inform the question of whether rail use by motorists is currently being deterred or restricted by inadequate facilities at the rail stations.
- 3.3 The surveys found that there is demand for parking at or near Langho station where none is available. Parking becomes effectively full at Whalley station and at Ramsgreave and Wilpshire. Parking at a cost of £3.50 per day near Clitheroe station becomes full by mid-morning, resulting in the need to use other car parks which charge £11.10 for more than a 3 hour stay.
- 3.4 Commuters or mid-day travellers who are familiar with the area, are likely to be deterred from using rail services from Whalley, Clitheroe, and Ramsgreave and Wilpshire, due to the likelihood that parking near those stations will not be available.
- 3.5 Rail commuters who do or could drive to Langho Station will be deterred because no parking exists at the station at all. If they drive to one of the other stations, then that likely incurs unnecessary mileage which could be saved if they could have parked at Langho.
- 3.6 Between the combined existing facilities at Ramsgreave and Wilpshire, Whalley and Langho railway stations, there is only one car parking space dedicated to blue badge holders, which is at Ramsgreave and Wilpshire. Additionally, there are no EV charge points within the existing infrastructure at Ramsgreave and Wilpshire, Whalley and Langho.
- 3.7 The absence of infrastructure near the rail stations means that any vehicle drivers who require an accessible parking space, or Electric Vehicle charging, will be deterred from using the existing stations.
- 3.8 The “already full” and lack of infrastructure position, means that there is no scope for future looking, Vision led strategies to promote mode shift from car to rail.

- 3.9 It can be concluded that a new car park at Langho would therefore:
- a) Accommodate the existing demand for people to park their vehicle in Langho and use the railway;
 - b) Accommodate the additional demand which may currently be being displaced to other less convenient railway stations;
 - c) Accommodate the release of any rail journey related parking demand, which is currently suppressed as a result of lack of parking availability;
 - d) Create a Vision Lead facility which will accommodate future parking demand arising from mode shift towards rail as promoted by future initiatives and strategies; and
 - e) Provide facilities for blue badge holders and Electric Vehicle charging, to overcome the lack of those facilities at other stations, which precludes rail travel for those who need those facilities.
- 3.10 The provision of a 40 space car park will not increase the number of journeys which need to be made. It will however serve to encourage the use of rail for part of those journeys. In doing so, it will encourage mode shift and promote sustainable travel. It will achieve that straight away in terms of serving existing and suppressed existing demands. It will also serve as advance provision to support the success of other initiatives and strategies which aspire to increase rail travel.

Appendices

Appendix A - 29th and 30th October 2025 – Survey Results

Date 30/10/2025

Station Name Ramsgrange & Wilsnack		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Baseline data		4	1	0	0	N/A	None		
Observations (Time 1:47)									
Occupied		3	0	0	0				
Observations (Time 10:41)									
Occupied		3	0	0	0				

Parking Near Station		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Area Description Co-op computer long stay									
Baseline data		9	0	0	0	N/A	None		
Observations (Time 7:49)									
Occupied		7	0	0	0				
Observations (Time 10:41)									
Occupied		9	0	0	0				

Parking Near Station		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Area Description									
Baseline data									
Observations (Time)									
Occupied									
Observations (Time)									
Occupied									

Parking Near Station		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Area Description									
Baseline data									
Observations (Time)									
Occupied									
Observations (Time)									
Occupied									

Date 29/10/2025

Station Name <i>Whalley</i>		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Baseline data		17	0	0	0	N/A	N/A		
Observations (Time 8:35)									
Occupied		10	0	0	0			10 cars parked on road	
Observations (Time 11:20)									
Occupied		14	0	0	0				

Parking Near Station		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Area Description <i>Whalley Sports Club</i>									
Baseline data		10 circa	0	0	0	N/A	£2/day	Gravel car park circa 10 spaces	
Observations (Time 8:43)									
Occupied		1	0	0	0				
Observations (Time 11:25)								Majority of the use seems to be tennis players	
Occupied		4	0	0	0				

Parking Near Station		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Area Description									
Baseline data									
Observations (Time)									
Occupied									
Observations (Time)									
Occupied									

Parking Near Station		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Area Description									
Baseline data									
Observations (Time)									
Occupied									
Observations (Time)									
Occupied									

Date 29/10/2025

Station Name : Clitheroe									
Station Car Park	Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs	
Baseline data									
Observations (Time)									
Occupied									
Observations (Time)									
Occupied									

Parking Near Station									
Area Description	Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs	
Market car park	62	6	0	0	up to 10 hrs	\$11.10	2 cars parked	See attached	
Baseline data									
Observations (Time 7:55)	2	0	0	0					
Occupied									
Observations (Time 10:45)	23	2	0	0					
Occupied									

Parking Near Station									
Area Description	Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs	
Railway view	68	8	4	2	up to 10 hrs	\$11.10		See attached	
Baseline data									
Observations (Time 8:00)	5	0	1	0					
Occupied									
Observations (Time 10:45)	56	4	2						
Occupied									

Parking Near Station									
Area Description	Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs	
Chesser Avenue	103	4	10	0	up to 10 hrs	83.50		See attached	
Baseline data									
Observations (Time 3:08)	30	0	1	0			12 cars on the road		
Occupied									
Observations (Time 10:50)	103	0	0	0			12 cars on the road		
Occupied									

Date: 30/10/2025

Station Name <i>Langino</i>									
Station Car Park		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
<i>Restaurant car park</i>									
Baseline data		<i>33</i>	<i>2</i>	<i>0</i>	<i>0</i>	<i>N/A</i>	<i>N/A</i>	<i>See attached images</i>	
Observations (Time <i>7:57</i>)									
Occupied		<i>2</i>	<i>1</i>	<i>0</i>	<i>0</i>			<i>7 cars parked on the road</i>	
Observations (Time <i>10:55</i>)									
Occupied		<i>3</i>	<i>1</i>	<i>0</i>	<i>0</i>			<i>9 cars parked on the road</i>	

Parking Near Station									
Area Description		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Baseline data									
Observations (Time)									
Occupied									
Observations (Time)									
Occupied									

Parking Near Station									
Area Description		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Baseline data									
Observations (Time)									
Occupied									
Observations (Time)									
Occupied									

Parking Near Station									
Area Description		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Baseline data									
Observations (Time)									
Occupied									
Observations (Time)									
Occupied									

Appendix B - 11th November 2025 – Survey Results

Date 11/12/2025

Station Car Park						
Station Name						Date
Langho (restaurant)						11/12/2025
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied	38	2	0	0	
Observations (Time)	Occupied	7	0			
Parking Near Station Whimney Lane		8	0			
Area Description		On Street (onead)	08:20 - 9	08:50 - 11	10:06 - 10:17	Observed rail command
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied	8				
Observations (Time)	Occupied	6				
Observations (Time)	Occupied	5				
Parking Near Station Lurvalley Road		08:20 - 6	08:50 - 7	10:06 - 7	10:57 - 8	
Area Description		On Street (businesses)				
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied	8				
Observations (Time)	Occupied	4				
Observations (Time)	Occupied	4				
Parking Near Station		08:20 - 4	08:50 - 8	10:06 - 8	10:57 - 8	
Area Description						
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations
Observations (Time)	Occupied					
Observations (Time)	Occupied					
Observations (Time)	Occupied					

Print off for each station and surrounding area.

Date 11/12/2025

Station Name									
Station Car Park		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Wvalley									
Baseline data		17	0	0	4	N/A	N/A		
Observations (Time) 08:01									
Occupied		16			0				
Observations (Time) 09:42									
Occupied		17			0				

10:44 17

0

Parking Near Station									
Area Description		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
Tennis Club									
Baseline data		10-15						informal parking	
Observations (Time) 08:00								No bays.	
Occupied		0							
Observations (Time) 09:42									
Occupied		0							

Parking Near Station									
Area Description		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
on-street									
Baseline data		13							
Observations (Time) 08:00		10						on street opposite	
Occupied								the car park & opposite	
Observations (Time) 09:42								properties	
Occupied		14							

10:44 12

Parking Near Station									
Area Description		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs
on-street (potentially restricted)									
Baseline data		6						on street opposite	
Observations (Time) 08:00								England house	
Occupied		3							
Observations (Time) 09:42									
Occupied		3							

10:44 3

Print off for each station and surrounding area.

Station Name										
Station Car Park										
Ramsgrave & Wilpswre										
Date 11/11/2025										
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs	
Observations (Time) 06:45		4	1	0	4	-	-			
Occupied										
Observations (Time) 09:08		2	0		0					
Occupied		3	0		0					
10:24										
Parking Near Station										
3										
Area Description										
Co-op Customer										
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs	
Observations (Time) 10:45		25	2	0	0	0	-			
Occupied										
Observations (Time) 09:08		1								
Occupied		5								
10:24										
7										
Area Description										
Co-op Customer										
Baseline data		Standard Spaces	Disabled Bays	EV Bays	Cycle spaces	Time limitations	Parking charges	Notes/Other Features	Photo Refs	
Observations (Time) 06:45		9	0	0	0	-		None for Commercial		
Occupied										
Observations (Time) 09:08		3								
Occupied		9								
10:24										
9										
Area Description										
Parking Near Station										
Standard Spaces										
Disabled Bays										
EV Bays										
Cycle spaces										
Time limitations										
Parking charges										
Notes/Other Features										
Photo Refs										
Baseline data										
Observations (Time)										
Occupied										
Observations (Time)										
Occupied										

Appendix C - Summary of Observed Potential Commuters During Spot Counts at Langho – 11th November 2025

Summary of Observations at Langho - 11/11/2025

Site visit time: 07:00 - 07:45

View from car park allowed observations to be made within the car park, Whinney Lane, Whalley Road (north of Moorland Road) and the station access (olive park).

- 1) A pedestrian exits a parked vehicle on Whinney Lane and walks to station.
- 2) A vehicle enters the car park, parks up and pedestrian walks to station.
- 3) Pedestrian with suitcase enters a parked vehicle in the car park and drives off.
- 4) A parked van and a parked car in the car park drive off.
- 5) A pedestrian with a dog walks from Whinney Lane to station.
- 6) A pedestrian with a dog walks from Whinney Lane to station.
- 7) A parked vehicle on Whinney Lane leaves.
- 8) A vehicle drove into the station access road.
- 9) A vehicle parks in the car park and driver walks to station.
- 10) A pedestrian walks to station access.
- 11) A vehicle parks in the car park and driver walks to station.
- 12) A pedestrian walks to station access.
- 13) A vehicle parks in the car park and driver walks to station.
- 14) A pedestrian walks to station access.
- 15) A pedestrian walks to station access.
- 16) Two pedestrians walk to station access.
- 17) Two pedestrians walk to station access.
- 18) Two pedestrians walk to station access.
- 19) A vehicle enters station access and exits moments later.
- 20) A pedestrian walks to station access.
- 21) A pedestrian walks to station access.
- 22) A pedestrian walks to station access.

Summary of Observations at Longho - 11/11/2025

Site visit time: 08:20 - 08:50am

Parked in same place as earlier visit.

- 1) A pedestrian walks to station access.
- 2) A pedestrian walks to station ~~access~~ access.
- 3) A vehicle parks on Whinney Lane and driver walks to station.
- 4) A vehicle arrives in car park and drops off a pedestrian who walks to the station.
- 5) A pedestrian walks to station access.
- 6) A pedestrian walks to station access.
- 7) A vehicle arrives in car park and leaves moments later.
- 8) Two pedestrians walk to station access.
- 9) A vehicle exits the station access.
- 10) Two vehicles park in car park, walk towards Whalley Road west

Key:	Pick up / Drop Off

Site Visit Date: 11/11/2025			
Observations at Langho (Restaurant Car Park)			
Observation Period: 07:00-07:45			
(Captures time before two train services, one in each direction - 07:31am to Rochdale, 07:43am to Clitheroe)			
	Potential Commuter	No. of Vehicles	
Parked car on Whinney Lane & walked down Olive Bank	1	1	
Parked car in Car Park and walked down Olive Bank	4	4	
Parking not observed but pedestrain walks down Olive Bank	Potential Commuter	No. of Vehicles	Dog Walker
From:			
Whalley Road	13	Unknown	0
Whinney Lane	0	0	2
Pedestrian emerges from Olive Bank	0	0	0
Vehicle Enters Olive Bank	-	2	-
Vehicle Exits Olive Bank	-	1	-

Site Visit Date: 11/11/2025			
Observations at Langho (Restaurant Car Park)			
Observation Period: 08:20-08:50			
(Captures time before two train services, one in each direction - 08:32am to Rochdale, 08:48am to Clitheroe)			
	Potential Commuter	No. of Vehicles	Dog Walker
Parked car on Whinney Lane & walked down Olive Bank	1	1	0
Parked car in Car Park and walked down Olive Bank	1	1	0
Parking not observed but pedestrain walks down Olive Bank			
From:			
Whalley Road	6	Unknown	0
Whinney Lane	0	0	0
Pedestrian emerges from Olive Bank	0	0	0
Vehicle Enters Olive Bank	0	0	0
Vehicle Exits Olive Bank	0	1	0

HTASoC Appendix 5: Policy Compliance Tables

Policy Review

Ribble Valley Key Statement DMI2: Transport Considerations

Policy Review Table 1: Review of Ribble Valley Key Statement DMI2 against the Proposals and the Planning Decision

Key Statement Wording	Context of the proposals:	Do the proposals comply
New developments should be located to minimise the need for to travel. Also it should incorporate good access by foot and cycle and have convenient links to public transport to reduce the need to travel by private car.	All dwellings at the proposed development will be provided with high speed broadband, which will enable efficient home working and therefore reduce the need to travel.	✓
	The proposals have 4 pedestrian accesses and 2 cycle accesses.	
	The proposals include new bus stops on the A59 and upgraded bus stops on Whalley Road. These bus stops are accessible within a short walk.	
	The proposals are directly adjacent to Langho Railway Station.	
	The proposals include a 40 space car park for the rail station which will accommodate existing and future demand from people to carry out an onward journey by train, which will reduce overall vehicle miles on the road network.	
	Given the above 4 points, the proposals will minimise the need to travel and provide convenient access on foot, by bicycle, and to public transport (both bus and rail)	
In general schemes offering opportunity for more sustainable means of transport and sustainable travel improvements will be supported.	The proposals offer more opportunity for sustainable means of transport and a great number of sustainable travel improvements. (see Sustainable Travel Appendix 6).	✓
	The proposals include 18 sustainable travel improvements (see Sustainable Travel Appendix 6).	
	The proposals include a further 16 sustainable travel measures (see Sustainable Travel Appendix 6).	
	Given the above 3 points, the Key Statement suggests that the proposal should have been supported.	
Major applications should always be accompanied by a comprehensive travel plan.	A comprehensive Framework travel plan was submitted as part of the application	✓

Ribble Valley Policy DMG1: General Considerations

Policy DMG1 comprises 20 items.

Those are under the headings of Design (5 items), Access (3 items), Amenity (4 items), Environment (5 items), Infrastructure (3 items) and Other (1 item).

The items relating to Transport and Highways are set out in Policy Review Table 2.

Policy Review Table 2: Review of Ribble Valley Policy DMG1 against the Proposals and the Planning Decision

Policy Wording	Context of the proposals:	Do the proposals comply
“In determining planning applications, all development must...		
<u>Access</u>		
1. Consider the potential traffic and car parking implications.	Suitably Assessed within the Transport Assessment and confirmed by the Local Highway Authority to be acceptable. Can be delivered to standards.	✓
2. Ensure safe access can be provided which is suitable to accommodate the scale and type of traffic likely to be generated.	The access layout is suitable for residential development of 300 dwellings. 3m wide footway / cycleways are provided to both sides of the site access arm. Visibility splays of 2.4 x 120m are provided for proposed speed limit.available visibility is appropriate for existing prevailing speeds. Vehicle tracking shows that the site access can accommodate service vehicles. 2 new bus stops on the A59 are included on the design. 3 pedestrian crossings on the A59 are provided, including one signalised crossing to provide access to the eastbound bus stops.	✓
3. Consider the protection and enhancement of public rights of way and access.”	There is one existing Public Right of Way which extends through the site. The connection points will be retained and the standard of the route will be improved. For the most part the existing alignment has been retained. In the northern side of the site, the public right of way is diverted slightly, to avoid a drainage pond. Overall, with the enhancements to the public right of way, the new route will be as commodious, if not more commodious than the previous route.	✓
<u>Infrastructure</u>		
1. Have regard to the availability to key infrastructure with capacity. Where key infrastructure with capacity is not available it may be necessary to phase development to allow infrastructure enhancements to take place.	Highway capacity has been assessed and the existing highway network can suitably accommodate the development proposals.	✓

Ribble Valley Policy DMG3: Transport and Mobility

Policy Review Table 3: Review of Ribble Valley Policy DMG3 against the Proposals and the Planning Decision

Policy Wording	Context of the proposals:	Do proposals comply	Evidence of having been given considerable weight
In making decisions on development proposals the local planning authority will, in addition to assessing proposals within the context of the development strategy, attach considerable weight to:			
The availability and adequacy of public transport and associated infrastructure to serve those moving to and from the development -	The site benefits from being located directly adjacent to the railway station, the bus services on the A59 and is close to the bus services on Whalley Road. The proposals provide new bus stops and improve existing bus stops. In this context the proposals comply and significantly exceed the requirements of the NPPF for a rural location.	✓	✗
The relationship of the site to the primary route network and the strategic road network.	The site provides direct access to the primary route network. The SRN is easily accessed from the A59.	✓	✗
The provision made for access to the development by pedestrian, cyclists and those with reduced mobility.	Provision is made for access by pedestrians and cyclists. Including footway improvements and traffic calming.	✓	✗
Proposals which promote development within existing developed areas or extensions to them at locations which are highly accessible by means other than the private car.	Mobility impaired users will be able to access facilities in Whalley, Clitheroe and Blackburn from the site by bus. They will also be able to access facilities in Langho on foot or by wheeling via the A29 and Whalley Road or Whitehalgh Lane.	✓	✗
Proposals which locate major generators of travel demand in existing centres which are highly accessible by means other than the private car.	The proposals are located on the edge of Langho and are accessible by bus, train, cycle and on foot.	✓	✗
Proposals which strengthen existing town and village centres which offer a range of everyday community shopping and employment opportunities by protecting and enhancing their vitality and viability	The residential proposals will enhance the vitality and viability of amenities in Langho through increasing the customer base.	✓	✗
Proposals which locate development in areas which maintain and improve choice for people to walk, cycle or catch public transport rather than drive between homes and facilities which they need to visit regularly.	The proposals are located to provide a choice of travel, see the sustainable travel list. They are located within reasonable journey times of facilities which are visited regularly.	✓	✗
Proposals which limit parking provision for developments and other on or off-street parking provision to discourage reliance on the car for work and other journeys where there are effective alternatives.	Parking to be provided in accordance with parking standards Significant positive weight to be given.	✓	✗
All major proposals should offer opportunities for increased use of, or the improved provision of, bus and rail facilities.	The proposals are delivering and upgrading bus stops and promote the use of bus via the travel plan. The proposals provide a rail station car park to enable and promote rail travel.	✓	✗
All development proposals will be required to provide adequate car parking and servicing space in line with currently approved standards.	This will be assured through the detailed design stage.	✓	✗

The council will protect land currently identified on the proposals map from inappropriate development that may be required for the opening of stations at Gisburn and Chatburn. Any planning application relating to these sites will be assessed having regard to the likelihood of the sites being required and the amount of harm that will be caused to the possible implementation of schemes.	The proposals do not affect opening of stations at Gisburn and Chatburn.	✓	Not applicable
The council will resist development that will result in the loss of opportunities to transport freight by rail.	The proposal will not result in the loss of opportunities to transport freight by train.	✓	Not applicable

NPPF Chapter 6 (Building a strong, competitive economy), Part 1 (Supporting a prosperous rural economy)
Paragraph 89

Policy Review Table 4: Review of NPPF Paragraph 89 against the Proposals and the Planning Decision

Policy Wording	Context of the proposals:	Do the proposals comply?
Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	The proposal will meet local community needs by providing more houses and meet local business needs through providing more local customers.	✓
	The proposals are located adjacent to the existing settlement of Langho.	
	The proposals are located adjacent to to a rail station and bus services.	
	The proposals therefore out-perform this policy.	
In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).	The proposals do not have an unacceptable impact on local roads, as demonstrated by the TA and the Highway Authority consultation response.	✓
	The proposals exploit opportunities to make a location more sustainable, see the list of sustainable travel improvements.	
The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.	The site is physically well-related to the existing settlement of Langho	✓

NPPF Chapter 9 (Promoting Sustainable Travel)
Paragraph 110

Policy Review Table 5: Review of NPPF Paragraph 110 against the Proposals and the Planning Decision

Policy Wording	Context of the proposals:	Do proposals comply
The planning system should actively manage patterns of growth in support of these objectives.	n/a	
Significant development should be focused on locations which are or can be made sustainable, <u>through limiting the need to travel and offering a genuine choice of transport modes</u> . This can help to reduce congestion and emissions, and improve air quality and public health.	All dwellings within the development will be provided with high speed broadband to enable working from home	✓
	A genuine choice of travel is provided, see list of sustainable travel measures in Appendix 6. The location is sustainable and that will be improved further.	✓
However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.	In the context of a rural location, the proposals offer a very high level of sustainable travel choice, even outperforming many urban locations. This should be reflected in decision making	✓
	The proposals seek to maximise opportunities for sustainable travel, see list of sustainable travel measures in Appendix 6	

NPPF Chapter 9 (Promoting Sustainable Travel)
Paragraph 115

Policy Review Table 6: Review of NPPF Paragraph 115 against the Proposals and the Planning Decision

Policy Wording	Context of the proposals:	Do proposals comply
115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:	n/a	
a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;	Sustainable travel is prioritised, see the list of sustainable travel improvements and measures, Appx 6 Considering the dispensations in Para 89 and 110 for rural locations, the proposals comply even more so.	✓
b) safe and suitable access to the site can be achieved for all users;	There are various safe and suitable access choices for all users. Refer to list of site access infrastructure and access enhancements Appx 6	✓
c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code48; and	Will be ensured at detail design stage	✓
d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.	The proposed mitigations address the impacts of the development and promote active and sustainable travel, in line with vision led transport strategy	✓

NPPF Chapter 9 (Promoting Sustainable Travel), Part 1 (Considering development proposals)

Paragraph 116

Policy Review Table 7: Review of NPPF Paragraph 116 against the Proposals and the Planning Decision

Policy Wording	Context of the proposals:	Do the proposals comply
Development should only be prevented or refused on highways grounds if...		
there would be an unacceptable impact on highway safety, or	There is no unacceptable impact on highway safety. Mitigations include signalised and non signalised crossings, traffic calming, speed limit reductions, pedestrian and cyclist infrastructure and an access which complies with design standards	✓
the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.	Even considering impacts and operational conditions in the peak periods there will be no significant impact on the road network following mitigation and certainly no severe impact.	✓

Site Access

- The proposed site access is a priority controlled T-junction, with a ghost island right turn.
- The carriageway of the site access road is 6.5m in width, widening to 9.5m on approach to Longsight Road. The site access road has a left turn lane and a right turn lane on approach.
- The junction has a kerb radius of 12m on both the eastern and western sides of the carriageway.
- There are 2m wide footways proposed on either side of the carriageway, which tie into a proposed 3m shared foot/cycleway.
- Two uncontrolled pedestrian crossings with tactile paving and a pedestrian refuse are provided on either side of the road.
- There is also an uncontrolled pedestrian crossing with tactile paving across the site access arm.
- A new signalised toucan crossing on the A59 Longsight Road is proposed to provide access to proposed bus stops and wider network.
- Visibility splays of 2.4m x 171m and 2.4m x 160m can be accommodated to the east and west of the proposed access junction respectively.
- The visibility splays are accordance with surveyed 85th percentile traffic speeds on Longsight Road of 54.3 and 52.1mph respectively.
 - The site access includes visibility splays which are in accordance with those suggest by DMRB for the recorded approach speeds.
- It is proposed to provide a gateway feature and traffic calming measures on Longsight Road to the east of the junction with Whitehalgh Lane, to facilitate a reduction in the existing speed limit to mph.
- The site access has been tracked using an 11.125m Refuse Vehicle and a 9.57m Pantechicon vehicle which demonstrates that the access is suitable to accommodate these vehicles.
- The Local Highway Authority have reviewed the site access strategy and did not raise an objection with the proposal.

Internal Layout and Parking

- The precise layout of the development will be determined as a reserved matter.
- Based on the Illustrative Masterplan, the intention is for the access road to run through the site on a looped basis to provide access to secondary roads for access to all individual dwellings.
- Turning heads will be provided within the site for safe and efficient entry / egress manoeuvres by refuse vehicles and fire tenders, in accordance with LCC standards.
- Car parking requirements, including EV charging facilities, will be considered and determined through future planning applications for reserved matters, in accordance with LCC standards.
- It is proposed to provide a new car park to the southeast of the site, serving Langho Railway Station on the northern side of the rail line.
- The vehicle access arrangement on Longsight Road would be adequate for accessing a car park.
- Details of ownership, management and layout of the car park will be agreed at a later stage in the planning process.

- The Local Highway Authority have reviewed the internal layout and parking, and did not raise an objection with the proposal.

Traffic Impact Assessment

- Five junctions have been assessed in terms of capacity as part of the Transport Assessment. These include:
 - Proposed access junction on the A59 Longsight Road;
 - A59 Longsight Road / Whalley Road / A666 roundabout junction;
 - A59 Longsight Road / Whitehalgh Lane / Chapel Lane junction;
 - Whalley Road / York Lane / Whitehalgh Lane junction.
 - A59 Longsight Road / Ribchester Road junction;
- The junction capacity assessments show that all of the assessed junctions are expected to perform within capacity in the '2030 With Development' scenario. The maximum RFC's recorded for each junction are outlined below for each junction:
 - Proposed access junction on the A59 Longsight Road. - Max RFC 0.53 on Site access right turn in the morning peak.
 - A59 Longsight Road / Whalley Road / A666 roundabout junction. - Max RFC 0.79 on A59 (east) both the morning and evening peaks.
 - A59 Longsight Road / Whitehalgh Lane / Chapel Lane junction. - Max RFC 0.37 on Chapel Lane in AM, and 0.37 on the A59 (west) in evening peak.
 - Whalley Road / York Lane / Whitehalgh Lane junction. - Max RFC 0.45 on Whalley Road (north east) in the morning peak.
 - A59 Longsight Road / Ribchester Road junction - Max DoS 88% on Ribchester Road (north) in the morning peak.
- The results from the junction capacity assessments show that all of the assessed junctions are expected to operate well within capacity in the 2030 With Development morning and evening peak scenarios.

HTASoC Appendix 6: Matrix of Sustainable Travel Improvements and Measures

			The development proposals provide a positive enhancement under the following key categories:											
				Pedestrian	Cyclist	Bus	Rail	Vehicle Driver Safety	NMU Safety	Reduced Need to Travel	Reduced need to travel by Private Car	Benefit to the Wider Public	Promotion of Sustainable Travel	Improves accessibility
On-Site Site	Connection	Off-Site	Infrastructure / Physical Improvements / Funding											
	✓		1. 2m wide footways will be provided at the proposed vehicular access point onto A59 Longsight Road.	✓					✓		✓		✓	✓
	✓	✓	2. A new section of 3m wide shared cycle/footway will be provided adjacent to the northern side of the development on A59 Longsight Road on either side of the carriageway, connecting the proposed site access junctions to nearby bus stops and existing footways on the northern side of A59 Longsight Road.	✓	✓				✓		✓	✓	✓	✓
	✓	✓	3. A pedestrian access point will also be provided to the southeast of the site, linking with existing PROW and nearby infrastructure leading towards Langho railway station and the railway underpass towards Langho village.	✓			✓				✓	✓	✓	✓
		✓	4. An uncontrolled pedestrian crossing with a 3.2m wide traffic island with tactile paving is proposed on the eastern arm of A59 Longsight Road.	✓					✓		✓	✓	✓	✓
		✓	5. An uncontrolled pedestrian crossing with a 3.2m wide traffic island with tactile paving is proposed on the western arm of A59 Longsight Road.	✓					✓		✓	✓	✓	✓
✓	✓		6. An uncontrolled pedestrian crossing is proposed across the site access arm.	✓					✓		✓		✓	✓
		✓	7. A signalised toucan pedestrian crossing point will be provided on the A59 Longsight Road.	✓	✓				✓		✓	✓	✓	✓
		✓	8. The existing zebra crossing located on Whalley Road to the south the development is to be upgraded with lighting improvements, and the refuge island at the existing crossing on Whalley Road will be upgraded with tactile paving, will support a direct and safe route for pedestrians between the proposed residential development and nearby primary school, bus stops and amenities within the village.	✓					✓		✓	✓	✓	✓
		✓	9. Two new bus stops will be provided on the A59 Longsight Road.				✓				✓	✓	✓	✓
		✓	10. Existing bus stops on the A666 Whalley Road will be upgraded with the provision of shelters.				✓				✓	✓	✓	✓
✓			11. Cycle parking will be provided at each dwelling, in accordance with LCC standards.		✓						✓		✓	✓
		✓	12. Provision of traffic calming measures on Longsight Road to the east of the junction with Whitehalgh Lane.					✓	✓			✓	✓	✓
		✓	13. Improvements to the existing infrastructure on Whitehalgh Lane, including traffic calming measures.					✓	✓			✓	✓	✓
		✓	14. Land to the south of the site will be safeguarded for future improvements to the train station to facilitate step free access.				✓				✓	✓	✓	✓
		✓	15. Provision of a new 40 space car park to the south east of the site, serving Langho rail station.				✓				✓		✓	✓
✓			16. The internal layout of development on the site will be confirmed at the relevant stage of the planning process. However, it is anticipated that footways will be provided along all internal roads, with informal pedestrian crossings (dropped kerbs with tactile paving) provided where necessary to allow the safe movement of pedestrians throughout the site.	✓					✓		✓		✓	✓
✓			17. Pedestrian routes will be provided throughout the development to increase permeability and minimise walking distances to external destinations. Any pedestrian infrastructure provided will be level, safe and well lit.	✓					✓		✓		✓	✓
✓			18. Provision of internet connectivity							✓	✓			✓
Sustainable Transport Measures														
Non-physical Measures			1. Public transport support of £175,000 every year for five years (totalling £875,000)			✓	✓				✓		✓	✓
			2. Appointment of a Travel Plan Coordinator (TPC) - who will answer any travel related queries from residents.				✓						✓	
			3. Fund the provision of discounted bus tickets to residents.				✓				✓		✓	✓
			4. The TPC will investigate the possibility of setting up 'Walking Buses'. It is noted that only schools can set up these groups therefore the approach is to contact relevant schools following findings of first survey, ask if they have a walking bus, and promote it to residents if so/appeal for walk leaders if the school has interest in setting up a walking bus.	✓							✓		✓	✓
			5. Promotion of health and environmental benefits of walking and cycling through Travel Plan communication materials.	✓	✓						✓		✓	
			6. Promotion of local active travel maps to support resident wayfinding through Travel Plan communication materials.	✓	✓						✓		✓	
			7. Promotion of cycle initiatives through Travel Plan communication materials, to help people to cycle.		✓						✓		✓	
			8. Provision of passenger information to residents within the travel guide. Such information would detail all public transport connections to the site, ticketing options, journey planning tools and bus timetable information available.				✓	✓			✓		✓	
			9. Travel Plan communication materials will promote events which encourage walking and cycling, such as National Walking Month, Bike Week, Walk to School Week and Love to Ride's Winter Wheelers.	✓	✓						✓		✓	
			10. Travel Plan communication materials will promote events which encourage public transport use, such as Catch the Bus Month and Travelwise Week				✓	✓			✓		✓	
			11. Promotion of a public car share scheme within the travel guide and wider communication materials.	✓							✓		✓	✓
			12. Information on efficient driving will be included within the travel guide and wider communication materials.					✓			✓		✓	
			13. Information about electric vehicles and charging facility information will be included within the travel guide and wider communication materials.										✓	
			14. Information and guidance on working from home / flexible working will be included within the travel guide and wider communication materials.							✓	✓		✓	
			15. Travel Plan communication materials promote measures to manage / reduce the impact of car travel, including the promotion of national events such as Car Free Day, Clean Air Day and Travelwise Week.								✓		✓	
			16. Travel plan support of £18,000 (circa £250 per dwelling to support a modal shift agreed and linked to the Travel Plan SMART targets)								✓		✓	

HTASoC Appendix 7: Plans Showing Pedestrian Routes from the Site to the Centre of Langho



Source: Google Earth

Land at Longsight Road

Walk routes between the centre of the site to the junction of Whalley Road/ Whinney Lane/ Olive Bank (i.e Centre of Langho)



HTASoC Appendix 8: Public Transport Timetables

Monday to Saturday - 25 - CLITHEROE - BLACKBURN

Interchange Clitheroe Town Centre (Stand 5)	---	---	09:20	11:20	13:20	15:20	16:30	17:35	18:45
Business Village Barrow (by)	---	---	09:28	11:28	13:28	15:28	16:38	17:43	18:52
Bus Station Whalley (Stand A)	---	---	09:35	11:35	13:35	15:35	16:45	17:50	18:59
The Academy Brockhall Village (by)	---	07:38	09:43	11:43	13:43	15:43	16:53	17:58	19:07
The Rydings Langho (W)	---	07:45	09:50	11:50	13:50	15:50	17:00	18:05	19:14
Millstone Mellor (SE)	06:56	07:56	10:01	12:01	14:01	16:01	17:11	18:16	19:24
Hare and Hounds Lammack (S)	07:02	08:03	10:08	12:08	14:08	16:08	17:18	18:23	19:30
St Marys College Blackburn (S)	07:05	08:06	10:11	12:11	14:11	16:11	17:21	18:26	19:33
Arrival Stand Blackburn Town Centre (Stand 0)	07:12	08:14	10:19	12:19	14:19	16:19	17:29	18:34	19:40

Timetable notes

Monday to Saturday - 25 - BLACKBURN - CLITHEROE

Bus Station Blackburn Town Centre (Stand 1)	07:20	09:25	11:25	13:25	15:25	16:25	17:40	18:45	19:45
St Marys College Blackburn (N)	07:28	09:33	11:33	13:33	15:33	16:33	17:48	18:52	19:52
Hare and Hounds Lammack (N)	07:31	09:36	11:36	13:36	15:36	16:36	17:51	18:55	19:55
Millstone Mellor (SE)	07:41	09:46	11:46	13:46	15:46	16:46	18:01	19:04	20:04
Whitehalgh Lane Langho (by)	07:51	09:56	11:56	13:56	15:56	16:56	18:11	19:14	---
The Academy Brockhall Village (by)	07:57	10:02	12:02	14:02	16:02	17:02	18:17	19:20	---
Bus Embayment Whalley (N)	08:03	10:08	12:08	14:08	16:08	17:08	18:23	---	---
Business Village Barrow (by)	08:10	10:15	12:15	14:15	16:15	17:15	18:30	---	---
Interchange Clitheroe Town Centre (Stand 6)	08:18	10:23	12:23	14:23	16:23	17:23	18:38	---	---

Timetable notes

MONDAY TO FRIDAY (excluding Bank Holidays)

▼ Connection guaranteed at Clitheroe Interchange

Preston	Bus Station Stand 39	0650	0723	0815	0915	1015	1115	1215	1315	1415	1515	1615	1715	1815
Preston	Hesketh Arms	0700	0733	0825	0925	1025	1125	1225	1325	1425	1530	1630	1730	1827
Mellor Brook	Feilden Arms	0710	0749	0835	0935	1035	1135	1235	1335	1435	1542	1642	1742	1837
Langho	Petre Arms	0720	0803	0845	0945	1045	1145	1245	1345	1445	1553	1653	1753	1846
Whalley	King Street Stand D	0728	0810	0852	0952	1052	1152	1252	1352	1452	1600	1700	1800	1853
Clitheroe	Interchange Stand 5	0740	0823	0904	1004	1104	1204	1304	1404	1504	1612	1712	1812	1904
		▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Clitheroe	Interchange Stand 5	0743	0823	0909	1009	1109	1209	1309	1409	1509	1615	1715	1815	-
Chatburn	Post Office	0751	-	0916	1016	1116	1216	1316	1416	1516	1622	1722	1821	-
Chatburn	Opp Post Office	-	0836	-	-	-	-	-	-	-	-	-	-	-
Gisburn	Travellers Court	0800	-	0924	1024	1124	1224	1324	1424	1524	1631	1731	1828	-
Barnoldswick	Station Road	0812	-	0935	1035	1135	1235	1335	1435	1535	1642	1742	1838	-
Earby	Bus Station	0825	-	0945	1045	1145	1245	1345	1445	1546	1651	1751	1848	-
Thornton in Craven	Post Office	0829	-	0949	1049	1149	1249	1349	1449	1550	1655	1755	-	-
Skipton	Craven College	0840*	-	-	-	-	-	-	-	-	-	-	-	-
Skipton	Bus Station Stand 4	0846	-	1004	1104	1204	1304	1404	1504	1604	1710	1810	-	-

* College days only

SATURDAY

SUNDAY (including Bank Holidays)

▼ Connection guaranteed at Clitheroe Interchange

Preston	Bus Station Stand 39	0655	0805	0910	1015	1115	1215	1315	1415	1515	1615	1715	1815
Preston	Hesketh Arms	0705	0815	0920	1025	1125	1225	1325	1425	1525	1625	1725	1825
Mellor Brook	Feilden Arms	0715	0825	0930	1035	1135	1235	1335	1435	1535	1635	1735	1835
Langho	Petre Arms	0725	0835	0940	1045	1145	1245	1345	1445	1545	1645	1745	1845
Whalley	King Street Stand D	0732	0842	0947	1052	1152	1252	1352	1452	1552	1652	1752	1852
Clitheroe	Interchange Stand 5	0744	0854	0959	1104	1204	1304	1404	1504	1604	1704	1804	1904
		▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Clitheroe	Interchange Stand 5	0749	0859	1004	1109	1209	1309	1409	1509	1609	1709	1809	-
Chatburn	Post Office	0756	0906	1011	1116	1216	1316	1416	1516	1616	1716	1816	-
Gisburn	Travellers Court	0804	0914	1019	1124	1224	1324	1424	1524	1624	1724	1824	-
Barnoldswick	Station Road	0815	0925	1030	1135	1235	1335	1435	1535	1635	1735	1835	-
Earby	Bus Station	0825	0935	1040	1145	1245	1345	1445	1545	1645	1745	1845	-
Thornton in Craven	Post Office	0829	0939	1044	1149	1249	1349	1449	1549	1649	1749	-	-
Skipton	Bus Station Stand 4	0844	0954	1059	1204	1304	1404	1504	1604	1704	1804	-	-

0840	1040	1240	1440	1640
0849	1049	1249	1449	1649
0858	1058	1258	1458	1658
0908	1108	1308	1508	1708
0915	1115	1315	1515	1715
0926	1126	1326	1526	1726
▼	▼	▼	▼	▼
0930	1130	1330	1530	1730
0937	1137	1337	1537	1737
0945	1145	1345	1545	1745
0956	1156	1356	1556	1756
1005	1205	1405	1605	-
1008	1208	1408	1608	-
1022	1222	1422	1622	-

MONDAY TO FRIDAY (excluding Bank Holidays)

▼ Connection guaranteed at Clitheroe Interchange

Skipton Bus Station Stand 4	—	—	—	0910	1010	1110	1210	1310	1410	1510	1610	1720	1820
Thornton in Craven Post Office	—	—	—	0922	1022	1122	1222	1322	1422	1522	1622	1732	1832
Earby Bus Station	0605	0647	—	0927	1027	1127	1227	1327	1427	1527	1627	1737	1837
Barnoldswick Fernlea Avenue	0615	0657	—	0938	1038	1138	1238	1338	1438	1538	1638	1748	1848
Gisburn Travellers Rest	0624	0706	—	0948	1048	1148	1248	1348	1448	1548	1648	1758	1858
Chatburn Opp Post Office	0632	0714	0837	0956	1056	1156	1256	1356	1456	1556	1656	1806	1906
Clitheroe Interchange Stand 4	0639	0721	0846	1005	1105	1205	1305	1405	1505	1605	1705	1815	1915
	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Clitheroe Interchange Stand 4	0642	0726	0855	1010	1110	1210	1310	1410	1510	1610	1715	1820	1920
Whalley Bus Station Stand A	0654	0739	0910	1025	1125	1225	1325	1425	1525	1625	1730	1832	1932
Langho Petre Arms	0700	0745	0916	1031	1131	1231	1331	1431	1531	1631	1736	1838	1937
Mellor Brook Feilden Arms	0710	0755	0927	1042	1142	1242	1342	1442	1542	1642	1746	1848	1946
Preston Hesketh Arms	0720	0815	0939	1054	1154	1254	1354	1454	1554	1656	1756	1858	1956
Preston Bus Station Stand 39	0730	0830	0951	1106	1206	1306	1406	1506	1606	1706	1808	1908	2005

SATURDAY

Skipton Bus Station Stand 4	-	-	0910	1010	1110	1210	1310	1410	1510	1610	1715	1815
Thornton in Craven Post Office	-	-	0922	1022	1122	1222	1322	1422	1522	1622	1727	1827
Earby Bus Station	-	-	0927	1027	1127	1227	1327	1427	1527	1627	1732	1832
Barnoldswick Fernlea Avenue	-	-	0938	1038	1138	1238	1338	1438	1538	1638	1743	1843
Gisburn Travellers Rest	-	-	0948	1048	1148	1248	1348	1448	1548	1648	1753	1853
Chatburn Opp Post Office	-	0856	0956	1056	1156	1256	1356	1456	1556	1656	1801	1901
Clitheroe Interchange Stand 4	-	0905	1005	1105	1205	1305	1405	1505	1605	1705	1810	1910
	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Clitheroe Interchange Stand 4	0755	0910	1010	1110	1210	1310	1410	1510	1610	1710	1815	1915
Whalley Bus Station Stand A	0810	0925	1025	1125	1225	1325	1425	1525	1625	1725	1827	1927
Langho Petre Arms	0816	0931	1031	1131	1231	1331	1431	1531	1631	1731	1833	1933
Mellor Brook Feilden Arms	0827	0942	1042	1142	1242	1342	1442	1542	1642	1742	1843	1943
Preston Hesketh Arms	0839	0954	1054	1154	1254	1354	1454	1554	1654	1753	1853	1953
Preston Bus Station Stand 39	0851	1006	1106	1206	1306	1406	1506	1606	1706	1803	1903	2003

SUNDAY (including Bank Holidays)

-	1030	1230	1430	1630	-
-	1042	1242	1442	1642	-
-	1047	1247	1447	1647	-
-	1057	1257	1457	1657	1757
-	1105	1305	1505	1705	1805
0913	1113	1313	1513	1713	1813
0921	1121	1321	1521	1721	1821
▼	▼	▼	▼	▼	▼
0925	1125	1325	1525	1725	1825
0937	1137	1337	1537	1737	1837
0943	1143	1343	1543	1743	1843
0953	1153	1353	1553	1753	1853
1003	1203	1403	1603	1803	1903
1013	1213	1413	1613	1813	1913

22 CLITHEROE - SHADSWORTH via Langho, Wilpshire (outbound)

Monday to Friday

Operator	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>
Notes	<i>SCHOL NSCHOL</i>											
Variations												
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	----	06:13	06:43	07:13	07:35	07:55	----	08:23	08:32	08:43	09:13	09:43
CHATBURN ROAD,Grammar School (o/s)	----	----	----	----	----	----	----	----	08:39	----	----	----
WHALLEY,Bus Station (Stand A)	----	06:26	06:58	07:28	07:50	08:10	----	08:38	08:58	08:58	09:28	09:58
LANGHO,Northcote Road (opp)	----	06:32	07:05	07:35	07:57	08:17	----	08:45	09:05	09:05	09:35	10:05
ROE LEE,Roe Lee Park (opp)	----	06:44	07:17	07:48	08:11	08:31	----	08:57	09:17	09:17	09:47	10:17
BLACKBURN TOWN CENTRE,Night Stand (opp)	----	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	06:30	06:55	07:28	08:00	08:25	08:45	09:05	09:08	09:28	09:28	09:58	10:28
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	----	07:00	07:35	08:05	08:35	----	----	----	09:35	09:35	10:05	10:35
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand A)	06:42	07:12	07:47	08:17	08:47	----	09:17	----	09:47	09:47	10:17	10:47
SHADSWORTH,Rothesay Road (opp)	06:46	07:16	07:51	08:21	08:51	----	09:21	----	09:51	09:51	10:21	10:51
Operator	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>
Notes	<i>SCHOL SCHOL</i>											
Variations	<i>W NW</i>											
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	10:13	10:43	11:13	11:43	12:13	12:43	13:13	13:43	14:13	----	14:43	14:53
CHATBURN ROAD,Grammar School (o/s)	----	----	----	----	----	----	----	----	----	----	14:53	----
WHALLEY,Bus Station (Stand A)	10:28	10:58	11:28	11:58	12:28	12:58	13:28	13:58	14:28	----	15:13	15:09
LANGHO,Northcote Road (opp)	10:35	11:05	11:35	12:05	12:35	13:05	13:35	14:05	14:35	----	15:20	15:16
ROE LEE,Roe Lee Park (opp)	10:47	11:17	11:47	12:17	12:47	13:17	13:47	14:17	14:47	----	15:32	15:28
BLACKBURN TOWN CENTRE,Night Stand (opp)	----	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	10:58	11:28	11:58	12:28	12:58	13:28	13:58	14:28	14:58	15:30	15:44	15:40
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	11:05	11:35	12:05	12:35	13:05	13:35	14:05	14:35	15:05	----	15:50	15:50
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand A)	11:17	11:47	12:17	12:47	13:17	13:47	14:18	14:48	15:18	15:43	16:03	16:03

SHADSWORTH,Rothesay Road (opp)	11:21	11:51	12:21	12:51	13:21	13:51	14:22	14:52	15:22	15:47	16:07	16:07
<i>Operator</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>
<i>Notes</i>	<i>NSCHOL</i>		<i>SCHOL</i>	<i>NSCHOL</i>	<i>SCHOL</i>							
<i>Variations</i>			<i>NW</i>		<i>W</i>							
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	14:53	15:23	15:43	15:53	15:53	16:23	16:53	17:13	17:43	18:13	18:43	19:23
CHATBURN ROAD,Grammar School (o/s)	----	----	15:53	----	----	----	----	----	----	----	----	----
WHALLEY,Bus Station (Stand A)	15:09	15:39	16:13	16:09	16:09	16:39	17:09	17:29	17:58	18:27	18:57	19:37
LANGHO,Northcote Road (opp)	15:16	15:46	16:20	16:16	16:16	16:46	17:16	17:36	18:05	18:33	19:03	19:43
ROE LEE,Roe Lee Park (opp)	15:28	15:58	16:32	16:28	16:28	16:58	17:28	17:48	18:17	18:44	19:12	19:52
BLACKBURN TOWN CENTRE,Night Stand (opp)	----	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	15:40	16:10	16:44	16:40	16:40	17:10	17:40	18:00	18:28	18:55	19:21	20:01
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	15:50	16:20	16:50	16:50	16:50	17:20	17:50	18:10	----	19:05	----	20:05
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand A)	16:03	16:33	17:03	17:03	17:03	17:33	18:03	18:22	----	19:15	----	20:14
SHADSWORTH,Rothesay Road (opp)	16:07	16:37	17:07	17:07	17:07	17:37	18:07	18:26	----	19:19	----	20:17
<i>Operator</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>	<i>LNUD</i>								
<i>Notes</i>	<i>\$\$</i>	<i>\$\$</i>	<i>\$\$</i>	<i>\$\$</i>								
<i>Variations</i>												
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	20:23	21:23	22:23	23:23								
CHATBURN ROAD,Grammar School (o/s)	----	----	----	----								
WHALLEY,Bus Station (Stand A)	20:37	21:37	22:37	23:37								
LANGHO,Northcote Road (opp)	20:43	21:43	22:43	23:43								
ROE LEE,Roe Lee Park (opp)	20:52	21:52	22:52	23:52								
BLACKBURN TOWN CENTRE,Night Stand (opp)	----	----	----	00:00								
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	21:01	22:01	23:01	----								
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	21:05	22:05	23:05	----								
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand A)	21:14	22:14	23:14	----								
SHADSWORTH,Rothesay Road (opp)	21:17	22:17	23:17	----								

Saturday

<i>Operator</i>	<u>LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD</u>											
<i>Notes</i>												
<i>Variations</i>												
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	----	----	07:23	----	08:13	08:43	09:13	09:43	10:13	10:43	11:13	11:43
WHALLEY,Bus Station (Stand A)	----	07:07	07:37	07:58	08:28	08:58	09:28	09:58	10:28	10:58	11:28	11:58
LANGHO,Northcote Road (opp)	----	07:13	07:43	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05
ROE LEE,Roe Lee Park (opp)	----	07:22	07:52	08:17	08:47	09:17	09:47	10:17	10:47	11:17	11:47	12:17
BLACKBURN TOWN CENTRE,Night Stand (opp)	----	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	06:35	07:31	08:01	08:28	08:58	09:28	09:58	10:28	10:58	11:28	11:58	12:28
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	----	07:35	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05	12:35
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand A)	06:47	07:47	08:17	08:47	09:17	09:47	10:17	10:47	11:17	11:47	12:17	12:47
SHADSWORTH,Rothesay Road (opp)	06:51	07:51	08:21	08:51	09:21	09:51	10:21	10:51	11:21	11:51	12:21	12:51
<i>Operator</i>	<u>LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD</u>											
<i>Notes</i>												
<i>Variations</i>												
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	12:13	12:43	13:13	13:43	14:13	14:43	15:13	15:43	16:13	16:43	17:13	17:43
WHALLEY,Bus Station (Stand A)	12:28	12:58	13:28	13:58	14:28	14:58	15:28	15:58	16:28	16:58	17:28	17:57
LANGHO,Northcote Road (opp)	12:35	13:05	13:35	14:05	14:35	15:05	15:35	16:05	16:35	17:05	17:35	18:03
ROE LEE,Roe Lee Park (opp)	12:47	13:17	13:47	14:17	14:47	15:17	15:47	16:17	16:47	17:17	17:47	18:14
BLACKBURN TOWN CENTRE,Night Stand (opp)	----	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	12:58	13:28	13:58	14:28	14:58	15:28	15:58	16:28	16:58	17:28	17:58	18:25
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	13:05	13:35	14:05	14:35	15:05	15:35	16:05	16:35	17:05	17:35	18:05	----
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand A)	13:17	13:47	14:17	14:47	15:17	15:47	16:17	16:47	17:17	17:47	18:15	----
SHADSWORTH,Rothesay Road (opp)	13:21	13:51	14:21	14:51	15:21	15:51	16:21	16:51	17:21	17:51	18:19	----
<i>Operator</i>	<u>LNUD LNUD LNUD LNUD LNUD LNUD</u>											
<i>Notes</i>	\$\$ \$\$ \$\$ \$\$											
<i>Variations</i>												
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	18:18	19:23	20:23	21:23	22:23	23:23						
WHALLEY,Bus Station (Stand A)	18:32	19:37	20:37	21:37	22:37	23:37						
LANGHO,Northcote Road (opp)	18:38	19:43	20:43	21:43	22:43	23:43						
ROE LEE,Roe Lee Park (opp)	18:49	19:52	20:52	21:52	22:52	23:52						
BLACKBURN TOWN CENTRE,Night Stand (opp)	----	----	----	----	----	00:00						
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	19:00	20:01	21:01	22:01	23:01	----						
BLACKBURN TOWN CENTRE,Bus Station (Stand 2)	19:05	20:05	21:05	22:05	23:05	----						
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand A)	19:15	20:14	21:14	22:14	23:14	----						
SHADSWORTH,Rothesay Road (opp)	19:19	20:17	21:17	22:17	23:17	----						

Sunday*Operator*LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD*Notes**Variations***CLITHEROE TOWN
CENTRE,Interchange (Stand 6)**

09:18 --- 10:18 --- 11:18 --- 12:18 --- 13:18 --- 14:18 ---

WHALLEY,Bus Station (Stand A)

09:32 --- 10:32 --- 11:32 --- 12:32 --- 13:32 --- 14:32 ---

LANGHO,Northcote Road (opp)

09:38 --- 10:38 --- 11:38 --- 12:38 --- 13:38 --- 14:38 ---

ROE LEE,Roe Lee Park (opp)

09:49 --- 10:49 --- 11:49 --- 12:49 --- 13:49 --- 14:49 ---

BLACKBURN TOWN CENTRE,Bus
Station (Stand 2)

09:58 10:05 10:58 11:05 11:58 12:05 12:58 13:05 13:58 14:05 14:58 15:05

BLACKBURN TOWN CENTRE,Bus
Station (Stand 2)

--- --- --- --- --- --- --- --- --- --- --- ---

ROYAL BLACKBURN

HOSPITAL,Royal Blackburn Hospital
(Stand A)

--- 10:14 --- 11:14 --- 12:14 --- 13:14 --- 14:14 --- 15:14

SHADSWORTH,Rothesay Road (opp)

--- 10:18 --- 11:18 --- 12:18 --- 13:18 --- 14:18 --- 15:18

*Operator*LNUD LNUD LNUD LNUD LNUD LNUD*Notes**Variations***CLITHEROE TOWN
CENTRE,Interchange (Stand 6)**

15:18 --- 16:18 --- 17:18 18:23

WHALLEY,Bus Station (Stand A)

15:32 --- 16:32 --- 17:32 18:37

LANGHO,Northcote Road (opp)

15:38 --- 16:38 --- 17:38 18:43

ROE LEE,Roe Lee Park (opp)

15:49 --- 16:49 --- 17:49 18:52

BLACKBURN TOWN CENTRE,Bus
Station (Stand 2)

15:58 16:05 16:58 17:05 17:58 19:01

BLACKBURN TOWN CENTRE,Bus
Station (Stand 2)

--- --- --- --- 18:05 ---

ROYAL BLACKBURN

HOSPITAL,Royal Blackburn Hospital
(Stand A)

--- 16:14 --- 17:14 18:14 ---

SHADSWORTH,Rothesay Road (opp)

--- 16:18 --- 17:18 18:18 ---

22 CLITHEROE - SHADSWORTH via Langho, Wilpshire (inbound)**Monday to Friday***Operator*LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD*Notes**Variations***SHADSWORTH,Rothesay Road (opp)**

--- 06:07 06:47 --- 07:17 07:52 08:22 08:52 09:22 09:52 10:22 10:52

ROYAL BLACKBURN

HOSPITAL,Royal Blackburn Hospital
(Stand B)

--- 06:16 06:56 --- 07:28 08:03 08:33 09:03 09:33 10:03 10:33 11:03

BLACKBURN TOWN CENTRE,Bus
Station (Stand 10)

05:50 06:26 07:06 07:33 07:42 08:18 08:48 09:16 09:46 10:16 10:46 11:16

BLACKBURN TOWN CENTRE,Bus
Station (Stand 10)

--- 06:30 07:10 --- 07:45 08:25 08:55 09:25 09:55 10:25 10:55 11:25

BLACKBURN TOWN
CENTRE,Alighting Stand (by)

--- --- --- --- --- --- --- --- --- --- --- ---

BLACKBURN TOWN
CENTRE,Alighting Stand (by)

--- --- --- --- --- --- --- --- --- --- --- ---

ROE LEE,Roe Lee Park (adj)

05:58 06:38 07:18 07:43 07:55 08:35 09:05 09:35 10:05 10:35 11:05 11:35

LANGHO,Railway Station (by)

06:06 06:49 07:29 07:56 08:08 08:46 09:16 09:46 10:16 10:46 11:16 11:46

WHALLEY,Bus Embayment (o/s)

06:13 06:58 07:38 08:05 08:17 08:55 09:25 09:55 10:25 10:55 11:25 11:55

CLITHEROE TOWN CENTRE,Interchange (Stand 6)	06:25	07:10	07:50	08:19	08:31	09:07	09:37	10:07	10:37	11:07	11:37	12:07
Operator	LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN											
Notes												
Variations												
SHADSWORTH,Rothesay Road (opp)	11:22	11:52	12:22	12:52	13:22	13:52	----	14:23	14:53	15:23	15:48	16:08
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand B)	11:33	12:03	12:33	13:03	13:33	14:03	----	14:34	15:04	15:34	15:59	16:19
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	11:46	12:16	12:46	13:16	13:46	14:16	14:50	14:48	15:18	15:48	16:13	16:33
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	11:55	12:25	12:55	13:25	13:55	14:25	----	----	15:25	15:55	16:20	16:40
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	----	----
ROE LEE,Roe Lee Park (adj)	12:05	12:35	13:05	13:35	14:05	14:35	15:01	----	15:36	16:06	16:31	16:51
LANGHO,Railway Station (by)	12:16	12:46	13:16	13:46	14:16	14:46	15:14	----	15:49	16:19	16:44	17:04
WHALLEY,Bus Embayment (o/s)	12:25	12:55	13:25	13:55	14:25	14:55	15:23	----	15:58	16:28	16:53	17:13
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	12:37	13:07	13:37	14:07	14:37	15:07	15:35	----	16:10	16:40	17:05	17:25
Operator	LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN LNUN											
Notes												
Variations												
SHADSWORTH,Rothesay Road (opp)	16:38	17:08	17:38	18:08	18:27	19:20	----	20:18	----	21:18	----	22:18
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand B)	16:49	17:19	17:49	18:19	18:35	19:28	----	20:26	----	21:26	----	22:26
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	17:03	17:33	18:02	18:32	18:45	19:38	19:40	20:36	20:40	21:36	21:40	22:36
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	17:10	17:40	18:10	18:40	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	----	----
ROE LEE,Roe Lee Park (adj)	17:21	17:50	18:18	18:48	----	----	19:48	----	20:48	----	21:48	----
LANGHO,Railway Station (by)	17:34	18:01	18:28	18:58	----	----	19:58	----	20:58	----	21:58	----
WHALLEY,Bus Embayment (o/s)	17:43	18:10	18:36	19:06	----	----	20:06	----	21:06	----	22:06	----
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	17:55	18:22	18:48	19:18	----	----	20:18	----	21:18	----	22:18	----
Operator	LNUN LNUN											
Notes	\$\$	\$\$										
Variations												
SHADSWORTH,Rothesay Road (opp)	----	23:18										
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand B)	----	23:26										
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	22:40	----										
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	----	----										
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	23:36										
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	23:40										

ROE LEE,Roe Lee Park (adj)	22:48	23:48
LANGHO,Railway Station (by)	22:58	23:58
WHALLEY,Bus Embayment (o/s)	23:06	00:06
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	23:18	00:18

Saturday

<i>Operator</i>	<i>LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD</i>											
<i>Notes</i>												
<i>Variations</i>												
SHADSWORTH,Rothesay Road (opp)	06:17	06:52	07:22	07:52	08:22	08:52	09:22	09:52	10:22	10:52	11:22	11:52
ROYAL BLACKBURN												
HOSPITAL,Royal Blackburn Hospital (Stand B)	06:25	07:03	07:33	08:03	08:33	09:03	09:33	10:03	10:33	11:03	11:33	12:03
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	06:35	07:16	07:46	08:16	08:46	09:16	09:46	10:16	10:46	11:16	11:46	12:16
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	06:40	07:25	07:55	08:25	08:55	09:25	09:55	10:25	10:55	11:25	11:55	12:25
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	----	----
ROE LEE,Roe Lee Park (adj)	06:48	07:33	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05	12:35
LANGHO,Railway Station (by)	06:58	07:43	08:16	08:46	09:16	09:46	10:16	10:46	11:16	11:46	12:16	12:46
WHALLEY,Bus Embayment (o/s)	07:06	07:51	08:25	08:55	09:25	09:55	10:25	10:55	11:25	11:55	12:25	12:55
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	07:18	08:03	08:37	09:07	09:37	10:07	10:37	11:07	11:37	12:07	12:37	13:07

<i>Operator</i>	<i>LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD</i>											
<i>Notes</i>												
<i>Variations</i>												
SHADSWORTH,Rothesay Road (opp)	12:22	12:52	13:22	13:52	14:22	14:52	15:22	15:52	16:22	16:52	17:22	17:52
ROYAL BLACKBURN												
HOSPITAL,Royal Blackburn Hospital (Stand B)	12:33	13:03	13:33	14:03	14:33	15:03	15:33	16:03	16:33	17:03	17:33	18:03
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	12:46	13:16	13:46	14:16	14:46	15:16	15:46	16:16	16:46	17:16	17:46	18:16
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	12:55	13:25	13:55	14:25	14:55	15:25	15:55	16:25	16:55	17:25	17:55	----
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE,Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	----	----
ROE LEE,Roe Lee Park (adj)	13:05	13:35	14:05	14:35	15:05	15:35	16:05	16:35	17:05	17:33	18:03	----
LANGHO,Railway Station (by)	13:16	13:46	14:16	14:46	15:16	15:46	16:16	16:46	17:16	17:43	18:13	----
WHALLEY,Bus Embayment (o/s)	13:25	13:55	14:25	14:55	15:25	15:55	16:25	16:55	17:25	17:51	18:21	----
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	13:37	14:07	14:37	15:07	15:37	16:07	16:37	17:07	17:37	18:03	18:33	----

<i>Operator</i>	<i>LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD</i>											
<i>Notes</i>												
<i>Variations</i>												
SHADSWORTH,Rothesay Road (opp)	18:20	----	19:20	----	20:18	----	21:18	----	22:18	----	23:18	
ROYAL BLACKBURN												
HOSPITAL,Royal Blackburn Hospital (Stand B)	18:28	----	19:28	----	20:26	----	21:26	----	22:26	----	23:26	
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	18:38	18:40	19:38	19:40	20:36	20:40	21:36	21:40	22:36	22:40	----	

BLACKBURN TOWN CENTRE, Bus Station (Stand 10)	----	----	----	----	----	----	----	----	----	----	----
BLACKBURN TOWN CENTRE, Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	23:36
BLACKBURN TOWN CENTRE, Alighting Stand (by)	----	----	----	----	----	----	----	----	----	----	23:40
ROE LEE, Roe Lee Park (adj)	----	18:48	----	19:48	----	20:48	----	21:48	----	22:48	23:48
LANGHO, Railway Station (by)	----	18:58	----	19:58	----	20:58	----	21:58	----	22:58	23:58
WHALLEY, Bus Embayment (o/s)	----	19:06	----	20:06	----	21:06	----	22:06	----	23:06	00:06
CLITHEROE TOWN CENTRE, Interchange (Stand 6)	----	19:18	----	20:18	----	21:18	----	22:18	----	23:18	00:18

Sunday

<i>Operator</i>	<i>LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD LNUD</i>											
<i>Notes</i>												
<i>Variations</i>												
SHADSWORTH,Rothesay Road (opp)	----	----	10:19	----	11:19	----	12:19	----	13:19	----	14:19	----
ROYAL BLACKBURN HOSPITAL,Royal Blackburn Hospital (Stand B)	----	----	10:27	----	11:27	----	12:27	----	13:27	----	14:27	----
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	09:35	10:35	10:37	11:35	11:37	12:35	12:37	13:35	13:37	14:35	14:37	15:35
BLACKBURN TOWN CENTRE,Bus Station (Stand 10)	----	----	----	----	----	----	----	----	----	----	----	----
ROE LEE,Roe Lee Park (adj)	09:43	10:43	----	11:43	----	12:43	----	13:43	----	14:43	----	15:43
LANGHO,Railway Station (by)	09:54	10:54	----	11:54	----	12:54	----	13:54	----	14:54	----	15:54
WHALLEY,Bus Embayment (o/s)	10:02	11:02	----	12:02	----	13:02	----	14:02	----	15:02	----	16:02
CLITHEROE TOWN CENTRE,Interchange (Stand 6)	10:14	11:14	----	12:14	----	13:14	----	14:14	----	15:14	----	16:14

<i>Operator</i>	<i>LNUD LNUD LNUD LNUD LNUD LNUD</i>					
<i>Notes</i>						
<i>Variations</i>						
SHADSWORTH, Rothesay Road (opp)	15:19	----	16:19	----	17:19	18:19
ROYAL BLACKBURN HOSPITAL, Royal Blackburn Hospital (Stand B)	15:27	----	16:27	----	17:27	18:27
BLACKBURN TOWN CENTRE, Bus Station (Stand 10)	15:37	16:35	16:37	17:40	17:37	18:37
BLACKBURN TOWN CENTRE, Bus Station (Stand 10)	----	----	----	----	----	18:40
ROE LEE, Roe Lee Park (adj)	----	16:43	----	17:48	----	18:48
LANGHO, Railway Station (by)	----	16:54	----	17:58	----	18:58
WHALLEY, Bus Embayment (o/s)	----	17:02	----	18:06	----	19:06
CLITHEROE TOWN CENTRE, Interchange (Stand 6)	----	17:14	----	18:18	----	19:18

Key

- NSCHOL - Not Clitheroe Royal Grammar School
- \$\$ - Operated in partnership with Lancashire County Council.
- \$\$ - Operated in partnership with Lancashire County Council
- SCHOL - Clitheroe Royal Grammar School only
- LNUD - Transdev Lancashire Unit

890 CLITHEROE ROYAL GRAMMAR SCHOOL - BOWLAND HIGH SCHOOL (outbound)

Monday to Friday

<i>Operator</i>	<i>MOV</i>
<i>Notes</i>	<i>SS,SCHOL</i>

Variations

CHATBURN ROAD,Grammar School TC (by)	08:32
CHATBURN,Mount Pleasant (o/s)	08:35
SAWLEY,Bowland County High School (by)	08:48

890 CLITHEROE ROYAL GRAMMAR SCHOOL - BOWLAND HIGH SCHOOL (inbound)

Monday to Friday

<i>Operator</i>	<i>MOV</i>	<i>MOV</i>
<i>Notes</i>	<i>SS,SCHOL</i>	<i>SS,SCHOL</i>

Variations

	<i>NW</i>	<i>W</i>
SAWLEY,Bowland County High School (by)	15:40	15:50
CHATBURN,Post Office (opp)	15:50	16:00
CHATBURN ROAD,Grammar School TC (by)	16:00	----
CHATBURN ROAD,Grammar School (o/s)	----	16:04
LANGHO,Rogersfield (opp)	----	16:22
WILPSHIRE,Somerset Avenue (opp)	----	16:25
WILPSHIRE,Wilpshire Hotel (Stop 2)	----	16:26
BROWNHILL,Holy Souls (opp)	----	16:28

Key

- SS - Operated on behalf of Lancashire County Council - School children only
- SCHOL - Bowland High School only
- MOV - Moving People Ltd

113 Wilpshire - Nelson & Colne College via Whalley, Read, Higham (outbound)

Monday to Friday

<i>Operator</i>	<i><u>BPTR</u></i>
<i>Notes</i>	<i>NELS</i>
<i>Variations</i>	
WILPSHIRE, Wilpshire Hotel (Stop 1)	07:56
WHALLEY, Bus Station (Stand C)	08:10
PADIHAM, Slade Lane (by)	08:25
HIGHAM, Four Alls Inn (o/s)	08:30
FENCE, Bay Horse Inn (opp)	08:33
BARROWFORD, Nelson and Colne College (adj)	08:40

113 Wilpshire - Nelson & Colne College via Whalley, Read, Higham (inbound)

Monday to Friday

<i>Operator</i>	<i><u>BPTR</u></i>	<i><u>BPTR</u></i>
<i>Notes</i>	<i>NELS</i>	<i>NELS</i>
<i>Variations</i>	<i><u>W</u></i>	<i><u>NW</u></i>
BARROWFORD, NELSON and COLNE College (by)	14:50	16:20
FENCE, Fence Gate Inn (opp)	14:57	16:27
HIGHAM, Four Alls Inn (opp)	15:00	16:30
PADIHAM, Slade Lane (adj)	15:04	16:34
WHALLEY, Bus Station (Stand A)	15:16	16:46
WILPSHIRE, Wilpshire Hotel (Stop 2)	15:27	16:57

Key

- NELS - Nelson and Colne College only
- BPTR - Transdev Burnley & Pendl

522 RIBCHESTER - KNOWLE GREEN - HURST GREEN - BILLINGTON ST AUGUSTINES - LANGHO RCPS (outbound)

Monday to Friday

<i>Operator</i>	<i>LCAC</i>
<i>Notes</i>	<i>\$\$,SCHOL</i>
<i>Variations</i>	
LONGRIDGE,St Cecillas RCHS (by)	07:40
LONGRIDGE,Health Centre (by)	07:42
RIBCHESTER,Black Bull (opp)	07:52
KNOWLE GREEN,Halls Arms (o/s)	08:00
CALDERSTONE,Kingsmill Avenue (opp)	08:13
CALDERSTONE,Cemetery (by)	08:15
WHALLEY,Bus Station (Stand C)	08:21
BILLINGTON,Elker Lane (opp)	08:31
BROCKHALL VILLAGE,The Academy (by)	08:35
BILLINGTON,St Augustines RCHS (by)	08:39
LANGHO,Longsight Road (opp)	08:44
LANGHO,Railway Station (opp)	08:47

522 RIBCHESTER - KNOWLE GREEN - HURST GREEN - BILLINGTON ST AUGUSTINES - LANGHO RCPS (inbound)

Monday to Friday

<i>Operator</i>	<i>LCAC</i>	<i>LCAC</i>	<i>LCAC</i>
<i>Notes</i>	<i>\$\$,SCHOL</i>	<i>\$\$,SCHOL</i>	<i>\$\$,SCHOL</i>
<i>Variations</i>	<i>NE</i>	<i>E</i>	<i>E</i>
BILLINGTON,St Augustines RCHS (by)	15:30	14:30	----
BROCKHALL VILLAGE,The Academy (by)	15:35	14:34	----
LANGHO,York Lane (opp)	15:40	----	15:35
LANGHO,St Leonards CEPS (adj)	15:44	----	15:37
BROCKHALL VILLAGE,The Academy (by)	15:50	----	15:45
BILLINGTON,St Augustines RCHS (by)	15:55	----	----
WHALLEY,Bus Embayment (o/s)	16:00	14:45	----
CALDERSTONE,Hospital (o/s)	16:05	14:50	----
CALDERSTONE,Kingsmill Avenue (by)	16:08	14:52	----
KNOWLE GREEN,Halls Arms (opp)	16:21	15:05	----
RIBCHESTER,Black Bull (by)	16:29	15:13	----
LONGRIDGE,Health Centre (opp)	16:33	15:17	----
LONGRIDGE,St Cecillas RCHS (by)	16:35	15:19	----

Key

- \$\$ - Operated on behalf of Lancashire County Council - School children only
- SCHOL - Billington St Augustines RCHS only

- LCAC - Lakeland Coaches

856 BLACKBURN - BILLINGTON ST AUGUSTINES (outbound)

Monday to Friday

Operator	ETNW
Notes	\$S,SCHOL
Variations	
BLACKBURN TOWN CENTRE,School Stand (Stop C1)	08:09
WILPSHIRE,Bulls Head (o/s)	08:25
LANGHO,Rogersfield (by)	08:33
BILLINGTON,Elker Lane (by)	08:40

856 BLACKBURN - BILLINGTON ST AUGUSTINES (inbound)

Monday to Friday

Operator	ETNW	ETNW
Notes	\$S,SCHOL	\$S,SCHOL
Variations	NE	E
BILLINGTON,St Augustines RCHS (by)	15:20	14:30
LANGHO,Rogersfield (opp)	15:27	14:37
WILPSHIRE,Bulls Head (opp)	15:35	14:45
BLACKBURN TOWN CENTRE,Arrival Stand (Stand 0)	15:52	15:02

Key

- \$S - Operated on behalf of Lancashire County Council - School children only
- SCHOL - Billington St Augustines RCHS only
- ETNW - Express Travel Services

860 BLACKBURN ROE LEE - CLITHEROE ROYAL GRAMMAR SCHOOL (outbound)

Monday to Friday

<i>Operator</i>	<i>MOV</i>
<i>Notes</i>	<i>SS,SCHOL</i>
<i>Variations</i>	
ROE LEE,Pearl Street (opp)	08:03
BROWNHILL,Holy Souls (opp)	08:07
WILPSHIRE,Wilpshire Hotel (Stop 1)	08:10
WILPSHIRE,Somerset Avenue (by)	08:11
LANGHO,Rogersfield (by)	08:14
CHATBURN ROAD,Grammar School TC (by)	08:32

860 BLACKBURN ROE LEE - CLITHEROE ROYAL GRAMMAR SCHOOL (inbound)

Monday to Friday

<i>Operator</i>	<i>MOV</i>	<i>MOV</i>
<i>Notes</i>	<i>SS,SCHOL</i>	<i>SS,SCHOL</i>
<i>Variations</i>	<i>W</i>	<i>NW</i>
CHATBURN ROAD,Grammar School TC (by)	14:40	16:00
LANGHO,Rogersfield (opp)	14:59	16:19
WILPSHIRE,Somerset Avenue (opp)	15:04	16:24
WILPSHIRE,Wilpshire Hotel (Stop 2)	15:04	16:24
BROWNHILL,Holy Souls (opp)	15:08	16:28
ROE LEE,Pearl Street (by)	15:11	16:31

Key

- SS - Operated on behalf of Lancashire County Council - School children only
- SCHOL - Clitheroe Royal Grammar School only
- MOV - Moving People Ltd

862 WILPSHIRE - CLITHEROE RIBBLESDALE H.S. (outbound)

Monday to Friday

Operator	~~ETNW~~
Notes	~~SS,SCHOL~~
Variations	
ROE LEE,Pearl Street (opp)	07:50
WILPSHIRE,Bulls Head (o/s)	07:55
WILPSHIRE,Wilpshire Hotel (Stop 1)	07:58
WILPSHIRE,Carr Hall (opp)	08:10
CLITHEROE TOWN CENTRE,Ribblesdale CHS (by)	08:30

862 WILPSHIRE - CLITHEROE RIBBLESDALE H.S. (inbound)

Monday to Friday

Operator	~~ETNW~~	~~ETNW~~	~~ETNW~~
Notes	~~SS,SCHOL~~	~~SS,SCHOL~~	~~SS,SCHOL~~
Variations	~~E~~	~~NWNE~~	~~W~~
CLITHEROE TOWN CENTRE,Ribblesdale CHS (by)	14:10	15:10	15:35
WILPSHIRE,Carr Hall (by)	14:33	15:33	15:58
WILPSHIRE,Bulls Head (opp)	14:35	15:35	16:00
ROE LEE,Pearl Street (by)	14:38	15:39	16:03

Key

- SS - Operated on behalf of Lancashire County Council - School children only
- SCHOL - Clitheroe Ribblesdale CHS only
- ETNW - Express Travel Services

458 BROWNHILL THE LATE SHOP - CLITHEROE RIBBLESDALE CHS via SALESBURY (outbound)

Monday to Friday

<i>Operator</i>	<i>MARI</i>
<i>Notes</i>	<i>\$\$,SCHOL</i>
<i>Variations</i>	
BROWNHILL,Brownhill Road (by)	07:53
SALESBURY,Somerset Avenue (opp)	07:58
SALESBURY,Bonny Inn (opp)	08:00
CLAYTON-LE-DALE,Lovely Hall Lane (opp)	08:02
WHALLEY,Bus Station (Stand A)	08:15
CLITHEROE TOWN CENTRE,Ribblesdale CHS (by)	08:35

458 BROWNHILL THE LATE SHOP - CLITHEROE RIBBLESDALE CHS via SALESBURY (inbound)

Monday to Friday

<i>Operator</i>	<i>MARI</i>	<i>MARI</i>	<i>MARI</i>
<i>Notes</i>	<i>\$\$,SCHOL</i>	<i>\$\$,SCHOL</i>	<i>\$\$,SCHOL</i>
<i>Variations</i>	<i>E</i>	<i>NWNE</i>	<i>W</i>
CLITHEROE TOWN CENTRE,Ribblesdale CHS (by)	14:15	15:15	15:35
WHALLEY,Bus Station (Stand A)	14:22	15:22	15:42
CLAYTON-LE-DALE,Oaks Bar (opp)	14:35	15:35	15:55
SALESBURY,Bonny Inn (o/s)	14:36	15:36	15:56
SALESBURY,Somerset Avenue (by)	14:37	15:37	15:57
BROWNHILL,Holy Souls (opp)	14:42	15:42	16:02

Key

- \$\$ - Operated on behalf of Lancashire County Council - School children only
- SCHOL - Clitheroe Ribblesdale CHS only
- MARI - Mario Coach Travel Ltd

623 Mellor - Clitheroe Royal Grammar School via Ramsgreave, Pleckgate, Wilpshire (outbound)

Monday to Friday

<i>Operator</i>	<i>NWBT</i>
<i>Notes</i>	<i>SCHOL</i>
<i>Variations</i>	
LAMMACK,Hare and Hounds (opp)	07:37
BROWNHILL,Brownhill Road (by)	07:42
WILPSHIRE,Bulls Head (o/s)	07:47
SALESBURY,Bonny Inn (opp)	07:51
COPSTER GREEN,Dewhurst Farm (opp)	08:00
BROCKHALL VILLAGE,The Academy (by)	08:06
LANGHO,Longsight Road (by)	08:14
BILLINGTON,Billington Gardens (opp)	08:17
WHALLEY,Toby Jug (opp)	08:21
CHATBURN ROAD,Grammar School TC (by)	08:38

623 Mellor - Clitheroe Royal Grammar School via Ramsgreave, Pleckgate, Wilpshire (inbound)

Monday to Friday

<i>Operator</i>	<i>NWBT</i>	<i>NWBT</i>
<i>Notes</i>	<i>SCHOL</i>	<i>SCHOL</i>
<i>Variations</i>	<i>NW</i>	<i>W</i>
CHATBURN ROAD,Grammar School TC (by)	15:50	14:35
CHATBURN ROAD,Well Terrace (Stop D)	15:55	14:40
WHALLEY,Toby Jug (by)	16:10	14:55
BILLINGTON,Billington Gardens (by)	16:13	14:58
LANGHO,Longsight Road (opp)	16:16	15:01
BROCKHALL VILLAGE,The Academy (by)	16:26	15:11
LANGHO,The Rydings (adj)	16:31	15:16
SALESBURY,Bonny Inn (o/s)	16:36	15:21
WILPSHIRE,Bulls Head (opp)	16:41	15:26
BROWNHILL,Holy Souls (opp)	16:46	15:31
LAMMACK,Hare and Hounds (adj)	16:51	15:36

Key

- SCHOL - Clitheroe Royal Grammar School only
- NWBT - Boomerang Travel Ltd T/A

638 Pendleton Village - Billington St Augustines RCHS (outbound)

Monday to Friday

Operator	<u>CRAN</u>
Notes	<u>\$S,SCHOL</u>
Variations	
PENDLETON,Village (adj)	08:10
SABDEN,Four Lane Ends (adj)	08:20
WHALLEY,Portfield Road (opp)	08:25
BILLINGTON,St Augustines RCHS (by)	08:35

638 Pendleton Village - Billington St Augustines RCHS (inbound)

Monday to Friday

Operator	<u>CRAN</u>	<u>CRAN</u>
Notes	<u>\$S,SCHOL</u>	<u>\$S,SCHOL</u>
Variations	<u>NE</u>	<u>E</u>
BILLINGTON,St Augustines RCHS (by)	15:20	14:30
WHALLEY,Portfield Road (by)	15:30	14:40
SABDEN,Four Lane Ends (by)	15:35	14:45
PENDLETON,Pendleton Road (by)	15:45	14:55

Key

- \$S - Operated on behalf of Lancashire County Council - School children only
- SCHOL - Billington St Augustines RCHS only
- CRAN - Cranberry Coachways Ltd

121 Clitheroe - Burnley College via Whalley, Wilpshire (outbound)

Monday to Friday

<i>Operator</i>	<i>BPTR</i>
<i>Notes</i>	<i>BURN</i>
<i>Variations</i>	
CLITHEROE TOWN CENTRE, Interchange (Stand 6)	07:36
PRIMROSE, Littlemoor Road (by)	07:41
WHALLEY, Bus Station (Stand A)	07:50
LANGHO, Longsight Road (opp)	07:55
WILPSHIRE, Turning Circle (opp)	08:04
RISHTON, War Memorial (opp)	08:13
RISHTON, Station Road (opp)	08:14
CLAYTON-LE-MOORS, Hare and Hounds (by)	08:19
STONEYHOLME, Burnley College (opp)	08:44

121 Clitheroe - Burnley College via Whalley, Wilpshire (inbound)

Monday to Friday

<i>Operator</i>	<i>BPTR</i>
<i>Notes</i>	<i>BURN</i>
<i>Variations</i>	
STONEYHOLME, Burnley College (opp)	16:45
CLAYTON-LE-MOORS, Hare and Hounds (by)	17:03
RISHTON, Station Road (by)	17:08
RISHTON, War Memorial (by)	17:09
WILPSHIRE, Turning Circle (by)	17:19
LANGHO, Longsight Road (by)	17:29
WHALLEY, Bus Embayment (o/s)	17:34
PRIMROSE, Littlemoor Road (opp)	17:41
CLITHEROE TOWN CENTRE, Interchange (Stand 6)	17:46

Key

- BURN - Burnley College only
- BPTR - Transdev Burnley & Pendl

464 Brockhall - Ribblesdale CHS via Langho (outbound)

Monday to Friday

<i>Operator</i>	<i>MARI</i>
<i>Notes</i>	<i>\$S,SCHol</i>
<i>Variations</i>	
BROCKHALL VILLAGE,The Academy (by)	08:05
LANGHO,Longsight Road (by)	08:10
WHALLEY,Bus Embayment (o/s)	08:20
CLITHEROE TOWN CENTRE,Ribblesdale CHS (by)	08:30

464 Brockhall - Ribblesdale CHS via Langho (inbound)

Monday to Friday

<i>Operator</i>	<i>MARI</i>	<i>MARI</i>	<i>MARI</i>
<i>Notes</i>	<i>\$S,SCHol</i>	<i>\$S,SCHol</i>	<i>\$S,SCHol</i>
<i>Variations</i>	<i>E.</i>	<i>NWNE.</i>	<i>W.</i>
CLITHEROE TOWN CENTRE,Ribblesdale CHS (by)	14:15	15:15	15:35
WHALLEY,Bus Station (Stand A)	14:25	15:25	15:45
LANGHO,Longsight Road (opp)	14:40	15:40	16:00
BROCKHALL VILLAGE,The Academy (by)	14:45	15:45	16:05

Key

- \$S - Operated on behalf of Lancashire County Council - School children only
- SCHol - Clitheroe Ribblesdale CHS only
- MARI - Mario Coach Travel Ltd

616 LAMMACK - RAMSGREAVE SPREAD EAGLE - CLITHEROE RIBBLESDALE CHS (outbound)

Monday to Friday

<i>Operator</i>	<i>MARI</i>
<i>Notes</i>	<i>\$\$,SCHOL</i>
<i>Variations</i>	
BLACKBURN,Barker Lane (opp)	07:39
RAMSGREAVE,Spread Eagle (opp)	07:44
MELLOR,Millstone (by)	07:47
MELLOR BROOK,Branch Road (by)	07:51
MELLOR BROOK,Feilden Arms (opp)	07:53
OSBALDESTON,Bay Horse (o/s)	07:57
COPSTER GREEN,Wheatley Farm (adj)	08:01
LANGHO,Whitehalgh Lane (by)	08:04
BILLINGTON,Elker Lane (by)	08:15
WHALLEY,Bus Embayment (o/s)	08:20
LAMB ROE,The Eagle (by)	08:24
CLITHEROE TOWN CENTRE,Ribblesdale CHS (by)	08:30

616 LAMMACK - RAMSGREAVE SPREAD EAGLE - CLITHEROE RIBBLESDALE CHS (inbound)

Monday to Friday

<i>Operator</i>	<i>MARI</i>	<i>MARI</i>	<i>MARI</i>
<i>Notes</i>	<i>\$\$,SCHOL</i>	<i>\$\$,SCHOL</i>	<i>\$\$,SCHOL</i>
<i>Variations</i>	<i>NWNE</i>	<i>W</i>	<i>E</i>
CLITHEROE TOWN CENTRE,Ribblesdale CHS (by)	15:15	15:35	14:15
LAMB ROE,The Eagle (opp)	15:23	15:43	14:23
WHALLEY,Bus Station (Stand C)	15:27	15:47	14:27
BILLINGTON,Elker Lane (opp)	15:30	15:50	14:30
BILLINGTON,St Augustines RCHS (by)	15:35	15:55	14:35
COPSTER GREEN,Park Gate Road (o/s)	15:40	15:58	14:40
CLAYTON-LE-DALE,Lovely Hall Lane (by)	15:41	15:59	14:41
OSBALDESTON,Bay Horse (opp)	15:45	16:05	14:45
MELLOR BROOK,Feilden Arms (o/s)	15:50	16:09	14:50
MELLOR BROOK,The Windmill (by)	15:52	16:16	14:52
MELLOR,Millstone (opp)	15:56	16:20	14:56
RAMSGREAVE,Spread Eagle (by)	15:59	16:23	14:59
PLECKGATE,Lammack Road (by)	16:04	16:27	15:04

Key

- \$\$ - Operated on behalf of Lancashire County Council - School children only
- SCHOL - Clitheroe Ribblesdale CHS only

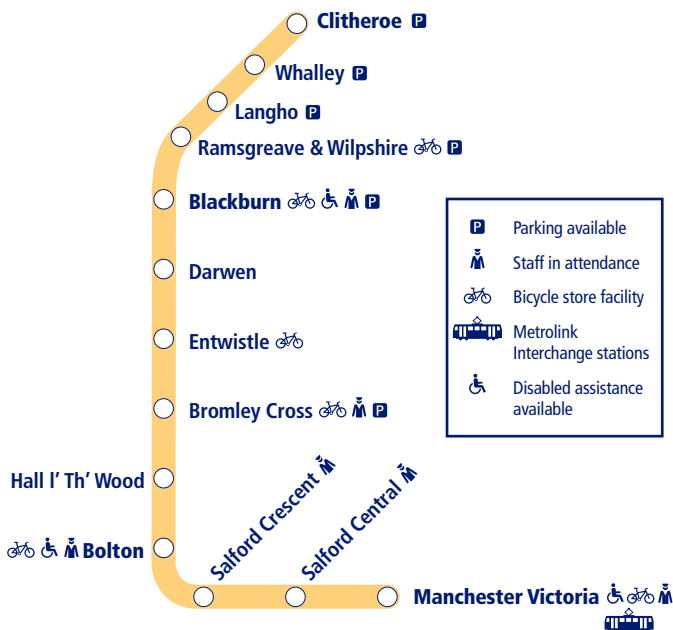
- MARI - Mario Coach Travel Ltd

Train times

18 May – 5 October 2025

12

Manchester to Blackburn and Clitheroe



NORTHERN

Go do your thing

This timetable shows all train services between **Clitheroe/Blackburn and Manchester**. Other trains run between **Bolton and Manchester** (Timetable 11).

How to read this timetable



Look down the left hand column for your departure station. Read across until you find a suitable departure time. Read down the column to find the arrival time at your destination. Through services are shown in bold type (this means you won't have to change trains). Connecting services are shown in light type. If you travel on a connecting service, change at the next station shown in bold or if you arrive on a connecting service, change at the last station shown in bold, unless a footnote advises otherwise.

Minimum connection times



All stations have a minimum connection time of 5 minutes unless stated.

Community Rail Partnerships and community groups



We support a number of active community rail partnerships (CRPs) across our network. CRPs bring together local communities and the rail industry to deliver benefits to both, and encourage use of the lines they represent.

Clitheroe Line Community Rail Partnership
www.communityraillancashire.co.uk

Some stations on this route are adopted by local community groups. For more information visit **northernrailway.co.uk/community**

Planning your journey



National Rail Enquiries

For full details of all train times, fares and rail travel information anywhere on the national rail network, call **03457 48 49 50**, or visit **nationalrail.co.uk**

TrainTracker™

For up to date travel information and live departures direct to your mobile, text your station **name** or **location code** to **8 49 50**.

Customers with disabilities or restricted mobility are encouraged to contact our **Customer Experience Centre** who will book assistance for you.

Call: **0800 138 5560**

Textphone: **0800 138 5561**

Email: **assistance@northernrailway.co.uk**

Improving our railway



Engineering work to help improve our services sometimes affects trains, particularly at weekends and bank holidays.

Visit: **northernrailway.co.uk/improvements** or call National Rail Enquiries: **03457 48 49 50** to check before you travel.

Delay Repay



You can claim Delay Repay if one of our trains is late or cancelled and as a result you get to your destination station later than scheduled, whether it is our fault or not.

Visit **northernrailway.co.uk/delayrepay** for more information.

Whilst every care has been taken to ensure the accuracy of the information contained in this timetable, we can accept no liability for any inaccuracies, and reserve the right to change information without further notice. Visit our website for the most up to date timetables and check before you travel.

Manchester - Blackburn - Clitheroe

Mondays to Saturdays

								SO	SX		
	Rochdale	d	-	-	-	0551	0652	0721	0752	0752	0822 0852
	Manchester Victoria	d	-	-	0543	0614	0715	0743	0815	0815	0845 0915
	Salford Central	-	-	-	0546	0617	0718	0746	0818	0818	0848 0918
	Salford Crescent	-	-	-	0551	0621	0722	0752	0822	0822	0851 0922
	Bolton	-	-	-	0604	0634	0735	0804	0835	0835	0904 0935
	Hall I' Th' Wood	-	-	-	0609	0639	0740	0809	0840	0840	0909 0940
	Bromley Cross	-	-	-	0613	0643	0744	0813	0844	0844	0913 0944
	Entwistle	-	-	-	0619	-	-	0819	-	-	0919 -
	Darwen	-	-	-	0626	0655	0756	0826	0856	0856	0926 0956
	Blackburn	a	-	-	0634	0703	0804	0834	0903	0904	0934 1004
	Blackburn	d	0611	0732	0635	-	-	0835	0908	-	0935 -
	Ramsgreave & Wilpshire		0617	0738	0644	-	-	0844	0914	-	0944 -
	Langho		0622	0743	0649	-	-	0848	0919	-	0948 -
	Whalley		0626	0748	0653	-	-	0853	0924	-	0953 -
	Clitheroe	a	0634	0756	0701	-	-	0901	0930	-	1001 -
	Hellifield	-	-	-	-	-	-	-	0954	-	- -
	Settle	-	-	-	-	-	-	-	1003	-	- -
	Horton In Ribblesdale	-	-	-	-	-	-	-	1012	-	- -
	Ribblehead	a	-	-	-	-	-	-	1019	-	- -

Mondays to Saturdays

									SX	SO	
	Rochdale	d	0921	0952	1021	1052	1121	1152	1222	1252	1252 1321
	Manchester Victoria	d	0943	1015	1043	1115	1143	1215	1244	1315	1314 1343
	Salford Central		0946	1018	1046	1118	1146	1218	1247	1318	1317 1346
	Salford Crescent		0951	1022	1051	1122	1151	1222	1251	1322	1321 1351
	Bolton		1004	1035	1104	1135	1204	1235	1304	1335	1335 1404
	Hall I' Th' Wood		1009	1040	1109	1140	1209	1240	1309	1340	1340 1409
	Bromley Cross		1012	1044	1113	1144	1213	1244	1313	1344	1344 1413
	Entwistle		1019	-	1119	-	1219	-	1319	-	- 1419
	Darwen		1025	1056	1126	1156	1226	1256	1326	1356	1356 1426
	Blackburn	a	1033	1104	1134	1204	1234	1304	1334	1404	1404 1434
	Blackburn	d	1034	-	1135	-	1235	-	1335	-	- 1435
	Ramsgreave & Wilpshire		1042	-	1144	-	1244	-	1344	-	- 1444
	Langho		1047	-	1148	-	1248	-	1348	-	- 1448
	Whalley		1051	-	1153	-	1253	-	1353	-	- 1453
	Clitheroe	a	1059	-	1201	-	1301	-	1401	-	- 1501
	Hellifield	-	-	-	-	-	-	-	-	-	- -
	Settle	-	-	-	-	-	-	-	-	-	- -
	Horton In Ribblesdale	-	-	-	-	-	-	-	-	-	- -
	Ribblehead	a	-	-	-	-	-	-	-	-	- -

Notes

SO Saturdays only.

SX Mondays to Fridays only.

Manchester - Blackburn - Clitheroe

Mondays to Saturdays

					SX	SO						
	Rochdale	d	1352	1421	1452	1452	1521	1552	1619	1653	1721	1752
Manchester	Victoria	d	1415	1443	1515	1515	1543	1615	1644	1715	1743	1815
	Salford Central		1418	1446	1518	1518	1546	1618	1647	1718	1746	1818
	Salford Crescent		1422	1451	1522	1522	1551	1622	1651	1722	1751	1822
	Bolton		1435	1504	1535	1535	1604	1635	1704	1735	1805	1836
	Hall I' Th' Wood		1440	1509	1540	1540	1609	1640	1709	1740	1810	1841
	Bromley Cross		1444	1513	1544	1544	1613	1644	1713	1744	1814	1845
	Entwistle		-	1519	-	-	1619	-	1719	1751	1821	-
	Darwen		1456	1526	1556	1556	1626	1656	1726	1758	1827	1857
	Blackburn	a	1504	1534	1604	1604	1634	1704	1734	1807	1835	1905
Ramsgreave & Wilpshire	Blackburn	d	-	1535	-	1615	1635	-	1735	-	1836	-
			-	1544	-	1621	1644	-	1744	-	1845	-
	Langho		-	1548	-	1626	1648	-	1748	-	1849	-
	Whalley		-	1553	-	1631	1653	-	1753	-	1854	-
	Clitheroe	a	-	1601	-	1637	1701	-	1801	-	1902	-
	Hellifield		-	-	-	1701	-	-	-	-	-	-
	Settle		-	-	-	1710	-	-	-	-	-	-
	Horton In Ribblesdale		-	-	-	1719	-	-	-	-	-	-
	Ribblehead	a	-	-	-	1726	-	-	-	-	-	-

Mondays to Saturdays

									SX	SO		
	Rochdale	d	1822	1852	1921	1952	2021	2121	2152	2252	2252	-
	Manchester Victoria	d	1843	1915	1943	2015	2043	2143	2215	2314	2314	-
	Salford Central		1846	1918	1946	2018	2046	2146	2218	2317	2317	-
	Salford Crescent		1851	1922	1951	2022	2051	2151	2222	2321	2320	-
	Bolton		1904	1935	2004	2035	2104	2204	2234	2333	2333	-
	Hall I' Th' Wood		1909	1940	2009	2040	2109	2209	2239	2338	2338	-
	Bromley Cross		1913	1944	2013	2044	2113	2213	2242	2341	2341	-
	Entwistle		1919	-	2019	-	2120	2220	2249	2348	2348	-
	Darwen		1926	1956	2026	2056	2127	2227	2256	2355	2355	-
	Blackburn	a	1934	2004	2034	2104	2134	2234	2303	0003	0003	-
	Blackburn	d	1935	-	2035	-	2136	2236	2304	-	-	-
	Ramsgreave & Wilpshire		1944	-	2044	-	2144	2244	2312	-	-	-
	Langho		1949	-	2048	-	2149	2249	2317	-	-	-
	Whalley		1953	-	2053	-	2153	2253	2322	-	-	-
	Clitheroe	a	2001	-	2101	-	2201	2301	2330	-	-	-
	Hellifield		-	-	-	-	-	-	-	-	-	-
	Settle		-	-	-	-	-	-	-	-	-	-
	Horton In Ribblesdale		-	-	-	-	-	-	-	-	-	-
	Ribblehead	a	-	-	-	-	-	-	-	-	-	-

Notes

SO Saturdays only.

SX Mondays to Fridays only.

Manchester - Blackburn - Clitheroe

Sundays

Manchester Victoria	d	0755	0839	0945	1048	1145	1245	1345	1445	1545	1645
Salford Central		-	0842	0948	1051	1148	1248	1348	1448	1548	1648
Salford Crescent		0802	0846	0952	1054	1152	1252	1352	1452	1552	1652
Bolton		0815	0900	1004	1107	1204	1304	1404	1504	1604	1704
Hall I' Th' Wood		0820	0906	1009	1112	1209	1309	1409	1509	1609	1709
Bromley Cross		0823	0910	1013	1115	1213	1313	1413	1513	1613	1713
Entwistle		0830	0917	1019	1122	1219	1319	1419	1519	1619	1719
Darwen		0836	0924	1026	1129	1226	1326	1426	1526	1626	1726
Blackburn	a	0844	0933	1033	1136	1233	1333	1433	1533	1633	1733
Blackburn	d	0845	0938	1035	1138	1235	1335	1435	1535	1635	1735
Ramsgreave & Wilpshire		0853	0947	1043	1146	1243	1343	1443	1543	1643	1743
Langho		0858	0952	1048	1151	1248	1348	1448	1548	1648	1748
Whalley		0902	0956	1052	1155	1252	1352	1452	1552	1652	1752
Clitheroe	a	0910	1004	1100	1203	1300	1400	1500	1600	1700	1800

Sundays

Manchester Victoria	d	1756	1845	1945	2112	2208	2314	-	-	-	-
Salford Central		1759	1848	1948	2116	2211	2317	-	-	-	-
Salford Crescent		1803	1852	1952	2119	2215	2321	-	-	-	-
Bolton		1819	1904	2004	2132	2227	2336	-	-	-	-
Hall I' Th' Wood		1824	1909	2009	2137	2232	2341	-	-	-	-
Bromley Cross		1827	1913	2013	2141	2235	2344	-	-	-	-
Entwistle		1834	1919	2019	2148	-	2351	-	-	-	-
Darwen		1841	1926	2026	2156	2247	2357	-	-	-	-
Blackburn	a	1848	1933	2033	2203	2254	0006	-	-	-	-
Blackburn	d	1850	1935	2035	2205	2255	-	-	-	-	-
Ramsgreave & Wilpshire		1858	1943	2043	2213	2303	-	-	-	-	-
Langho		1903	1948	2048	2218	2308	-	-	-	-	-
Whalley		1907	1952	2052	2222	2312	-	-	-	-	-
Clitheroe	a	1915	2000	2100	2230	2320	-	-	-	-	-

Clitheroe - Blackburn - Manchester

Mondays to Saturdays

Ribblehead	d	-	-	-	-	-	-	-	-	-	-
Horton In Ribblesdale		-	-	-	-	-	-	-	-	-	-
Settle		-	-	-	-	-	-	-	-	-	-
Hellifield		-	-	-	-	-	-	-	-	-	-
Clitheroe		-	0620	0651	0721	-	0822	-	0922	-	1022
Whalley		-	0626	0657	0727	-	0828	-	0928	-	1028
Langho		-	0631	0702	0732	-	0833	-	0933	-	1033
Ramsgreave & Wilpshire		-	0638	0709	0739	-	0840	-	0940	-	1040
Blackburn	a	-	0644	0715	0745	-	0846	-	0946	-	1046
Blackburn	d	0618	0646	0717	0747	0818	0848	0918	0948	1018	1048
Darwen		0626	0655	0726	0755	0828	0856	0928	0956	1028	1056
Entwistle		0633	0702	0733	0802	-	0903	-	1003	-	1103
Bromley Cross		0639	0708	0739	0808	0839	0909	0939	1009	1039	1109
Hall I' Th' Wood		0642	0710	0741	0810	0842	0912	0942	1012	1042	1112
Bolton	a	0647	0715	0746	0815	0847	0917	0947	1017	1047	1117
Salford Crescent	a	0700	0730	0801	0830	0900	0930	1000	1030	1100	1130
Salford Central	a	0703	0733	0804	0833	0903	0933	1003	1033	1103	1133
Manchester Victoria	a	0707	0739	0807	0839	0907	0939	1007	1039	1107	1138
Rochdale	a	0729	0801	0829	0902	0929	1001	1029	1102	1129	1200

Mondays to Saturdays

				SX	SO			SX	SO		
Ribblehead	d	-	-	-	1108	-	-	-	-	-	-
Horton In Ribblesdale		-	-	-	1114	-	-	-	-	-	-
Settle		-	-	-	1122	-	-	-	-	-	-
Hellifield		-	-	-	1130	-	-	-	-	-	-
Clitheroe		-	1122	-	1154	1222	-	1322	1322	-	1422
Whalley		-	1128	-	1200	1228	-	1328	1328	-	1428
Langho		-	1133	-	1204	1233	-	1333	1333	-	1433
Ramsgreave & Wilpshire		-	1140	-	1209	1240	-	1340	1340	-	1440
Blackburn	a	-	1146	-	1216	1246	-	1346	1346	-	1446
Blackburn	d	1118	1148	1218	1218	1248	1318	1348	1348	1418	1448
Darwen		1128	1156	1228	1228	1256	1328	1356	1356	1428	1456
Entwistle		-	1203	-	-	1303	-	1403	1403	-	1503
Bromley Cross		1139	1209	1239	1239	1309	1339	1409	1409	1439	1509
Hall I' Th' Wood		1142	1212	1242	1242	1312	1342	1412	1412	1442	1512
Bolton	a	1147	1217	1247	1247	1317	1347	1417	1417	1447	1517
Salford Crescent	a	1200	1230	1300	1300	1330	1400	1430	1430	1500	1530
Salford Central	a	1203	1233	1303	1303	1333	1403	1433	1433	1503	1533
Manchester Victoria	a	1207	1239	1307	1307	1339	1407	1439	1439	1507	1539
Rochdale	a	1229	1301	1329	1329	1401	1429	1501	1508	1529	1601

Notes

SO Saturdays only.

SX Mondays to Fridays only.

Clitheroe - Blackburn - Manchester

Mondays to Saturdays

									SX	SO
	Ribblehead	d	-	-	-	-	-	-	-	1805
Horton In Ribblesdale	Settle		-	-	-	-	-	-	-	1812
	Hellifield		-	-	-	-	-	-	-	1821
	Clitheroe		-	1522	-	1625	-	1721	-	1822
	Whalley		-	1528	-	1631	-	1727	-	1828
	Langho		-	1533	-	1636	-	1732	-	1833
Ramsgreave & Wilpshire	Blackburn	a	-	1540	-	1642	-	1740	-	1840
	Blackburn	a	-	1546	-	1648	-	1746	-	1846
	Blackburn	d	1518	1548	1618	1649	1718	1748	1818	1848
	Darwen		1528	1556	1628	1657	1728	1756	1828	1856
	Entwistle		-	1603	-	1704	-	1803	-	1903
	Bromley Cross		1539	1609	1639	1710	1739	1809	1839	1909
	Hall I' Th' Wood		1542	1612	1642	1713	1742	1812	1843	1912
	Bolton	a	1547	1617	1647	1718	1747	1817	1848	1917
	Salford Crescent	a	1600	1630	1700	1730	1800	1830	1901	1930
	Salford Central	a	1603	1633	1703	1733	1803	1833	1904	1933
Manchester Victoria		a	1607	1639	1707	1739	1807	1839	1908	1939
Rochdale		a	1629	1701	1729	1801	1829	1901	1930	2001

Mondays to Saturdays

					SX	SO	SX	SO	SX	SO
	Ribblehead	d	-	-	-	-	-	-	-	-
Horton In Ribblesdale	Settle		-	-	-	-	-	-	-	-
	Hellifield		-	-	-	-	-	-	-	-
	Clitheroe		1922	-	2022	2122	2239	2239	2342	2342
	Whalley		1928	-	2028	2128	2245	2245	2348	2348
	Langho		1933	-	2033	2133	2250	2250	2353	2353
Ramsgreave & Wilpshire	Blackburn	a	1940	-	2039	2140	2257	2257	2357	2358
	Blackburn	a	1946	-	2046	2146	2263	2263	0004	0004
	Blackburn	d	1948	2018	2048	2148	2264	2264	-	-
	Darwen		1956	2028	2056	2156	2272	2272	-	-
	Entwistle		2003	-	2103	2203	2319	2319	-	-
	Bromley Cross		2009	2039	2109	2209	2324	2324	-	-
	Hall I' Th' Wood		2012	2042	2112	2212	2327	2327	-	-
	Bolton	a	2017	2047	2117	2217	2332	2332	-	-
	Salford Crescent	a	2030	2102	2130	2230	2347	2347	-	-
	Salford Central	a	2033	2105	2133	2233	-	-	-	-
Manchester Victoria		a	2039	2108	2139	2238	2352	2354	-	-
Rochdale		a	2101	-	2201	2302	-	-	-	-

Notes

SO Saturdays only.

SX Mondays to Fridays only.

Clitheroe - Blackburn - Manchester

Sundays

Clitheroe	d	-	0923	1022	1122	1223	1323	1423	1523	1623	1719
Whalley	-	0929	1028	1128	1229	1329	1429	1529	1629	1725	
Langho	-	0934	1033	1133	1234	1334	1434	1534	1634	1730	
Ramsgreave & Wilpshire	-	0941	1040	1140	1241	1341	1441	1541	1641	1737	
Blackburn	a	-	0947	1046	1146	1247	1347	1447	1547	1647	1743
Blackburn	d	0848	0949	1048	1148	1249	1349	1449	1549	1649	1745
Darwen		0856	0956	1056	1156	1257	1357	1457	1557	1657	1753
Entwistle		0903	1003	1103	1203	1304	1404	1504	1604	1704	1800
Bromley Cross		0909	1009	1109	1209	1310	1410	1510	1610	1710	1806
Hall I' Th' Wood		0913	1012	1113	1212	1313	1413	1513	1613	1713	1809
Bolton	a	0918	1017	1118	1217	1318	1418	1518	1618	1718	1814
Salford Crescent	a	0932	1033	1132	1233	1332	1433	1533	1633	1733	1833
Salford Central	a	0935	1036	1135	1236	1335	1436	1536	1636	1736	1836
Manchester Victoria	a	0938	1039	1138	1239	1338	1439	1539	1639	1739	1839

Sundays

Clitheroe	d	1823	1947	2023	2123	2243	-	-	-	-	-
Whalley		1829	1953	2029	2129	2249	-	-	-	-	-
Langho		1834	1958	2034	2134	2253	-	-	-	-	-
Ramsgreave & Wilpshire		1841	2007	2041	2141	2300	-	-	-	-	-
Blackburn	a	1847	2014	2047	2147	2307	-	-	-	-	-
Blackburn	d	1850	2017	2049	2149	2307	-	-	-	-	-
Darwen		1858	2027	2057	2157	2315	-	-	-	-	-
Entwistle		1905	2034	2104	2204	2322	-	-	-	-	-
Bromley Cross		1911	2040	2110	2210	2328	-	-	-	-	-
Hall I' Th' Wood		1914	2043	2113	2213	2330	-	-	-	-	-
Bolton	a	1919	2048	2118	2218	2335	-	-	-	-	-
Salford Crescent	a	1933	2100	2133	2233	2348	-	-	-	-	-
Salford Central	a	1936	2103	2136	2236	2351	-	-	-	-	-
Manchester Victoria	a	1939	2108	2139	2239	2354	-	-	-	-	-

Useful contact details



Fares and service information

National Rail Enquiries
visit nationalrail.co.uk
call **03457 48 49 50**
textphone **0345 60 50 600**



Customer helpline

For comments and enquiries
visit northernrailway.co.uk/comments
call **0800 200 6060**



facebook /[northernassist](https://www.facebook.com/northernassist)



@[northernassist](https://twitter.com/northernassist)



Access or disabled information and assistance

call **0800 138 5560**
email assistance@northernrailway.co.uk



Lost property

email lostproperty@northernrailway.co.uk
call **0800 200 6060**

Correspondence

Customer Experience Centre
Freepost NORTHERN RAILWAY



British Transport Police

call **0800 40 50 40** text **61016**

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All our policy documents can be found at
northernrailway.co.uk/legal

HTASoC Appendix 9: Changes in Travel Behaviour - Reduced Trip Making

Trends Showing a Reduced Need to Travel

The Ribble Valley Core Strategy was adopted in 2014, after submission to the Secretary of State in 2012.

Since the adoption of the Core Strategy, travel trends have shown to evolve, with less reliance on physical journeys to access facilities, services and amenities. This coincides with the development of technology, and in particular the range of online services which can be used to access services without the need for physically travelling.

Working From Home

The proportion of people who undertake Hybrid Working patterns are reported to be:

- In 2019: 12%¹
- In 2022: 22%.¹
- In 2025: 28%.²

The proportion of people Full Time Working from Home are reported to be:

- In 2019: 5.1% (mainly from home).³
- In 2025: 13% (exclusively from home)⁴

¹ [The impact of remote and hybrid working on workers and organisations - POST](#)

² [UK Remote & Hybrid Working Trends And Statistics In 2025 – Forbes Advisor UK](#)

³ [Coronavirus and homeworking in the UK labour market - Office for National Statistics](#)

⁴ [Working from home statistics: How many people work from home?](#)

On-line Retail

Percentage of retail sales carried out online⁵:

- 2019 Q4: 21%
- 2021 Q4: 28%
- This represents an increase of 7% or 3.5% per annum.
- Prior to 2019, on-line retail was growing consistently at around 1.3% per annum.

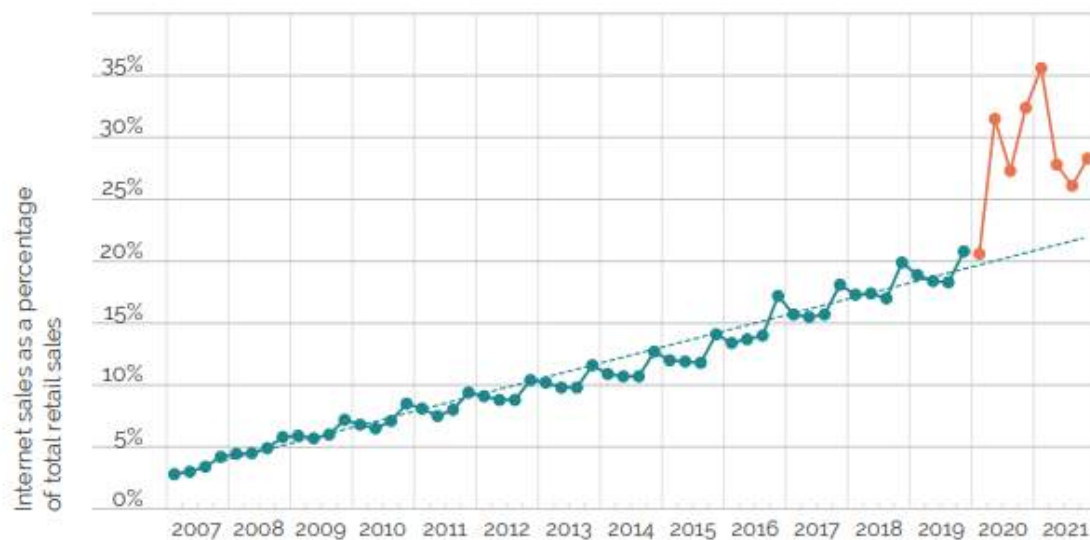
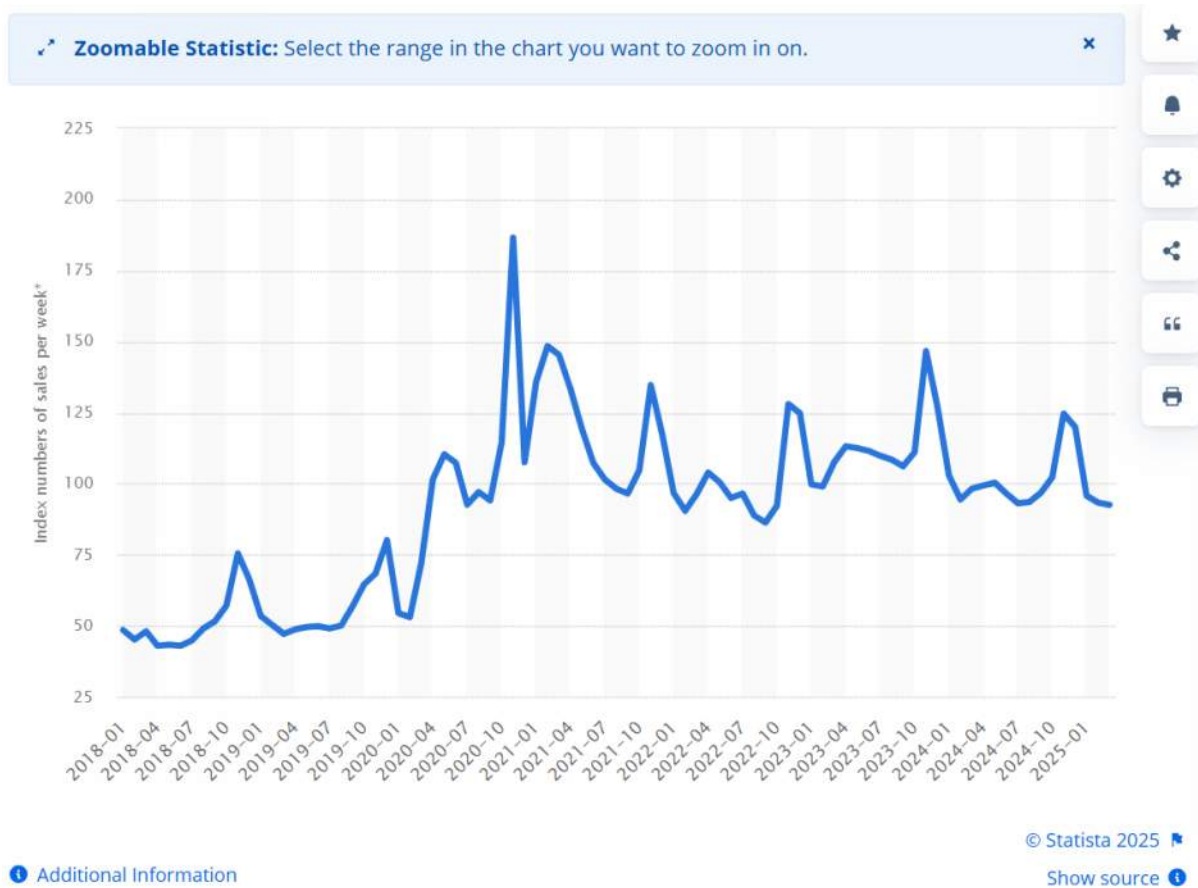


Figure 11: On-line retail sales as a percentage of all retail sales (ONS, 2022).¹²

⁵ Anable, J., Brown, L., Docherty, I. and Marsden, G. 2022. Less is more: Changing travel in a post-pandemic society. Centre for Research into Energy Demand Solutions. Oxford, UK. ISBN: 978-1-913299-15-6).

- The graph below produced by Statista (using original data from the Office for National Statistics) shows in the increasing monthly internet household good retails sales in Great Britain from 2018 – 2025.⁶
- January 2018: Approx. 50m sales per week carried out online.
- January 2025: Approx. 95m sales per week carried out online.



Online Medical Appointments

- A third of GP Appointments in England were carried out remotely in June 2025, according to Analysis of NHS Data.⁷
- Of these, 8% of appointments were carried out online and 25% over the phone. The proportion of remote consultations has risen from 30.9% in June 2024 and 28.3% in June 2023.⁸
- The proportion of GP appointments delivered by video or online has been rising, passing 1% in May 2023, 2% in August and 3% in December 2023.⁸

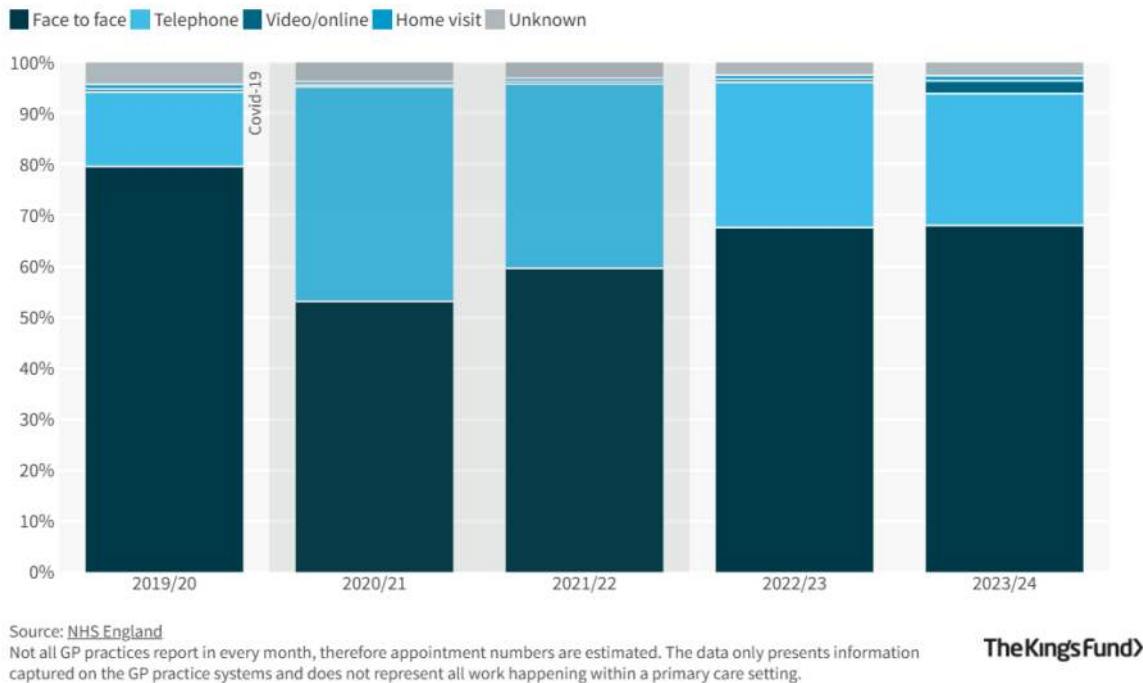
⁶ (<https://www.statista.com/statistics/286351/internet-household-goods-retail-sales-value-monthly-index-in-the-uk/>)

⁷ (Tammy Lovell (2025) A third of GP Appointments in England carried out Remotely, Digital Health) [A third of GP appointments in England carried out remotely](#)

⁸ [Rise of 'virtual doctors' as one in 20 GP appointments performed online or by video - Manchester Evening News](#)

- It rose to 4% in March 2024 and stood at 5.2% in August 2024: the first time it has been above 5%.⁹

The majority of appointments with GP practices are still face to face



- The Graph above produced by The Kings Fund¹⁰ shows a reduction in face-to-face appoints from approximately 79% in 2019/20 to approximately 68% in 2023/24.

Journalism Circulation

The following trends regarding journalism and news show a decline in physical material for news in 2019¹¹:

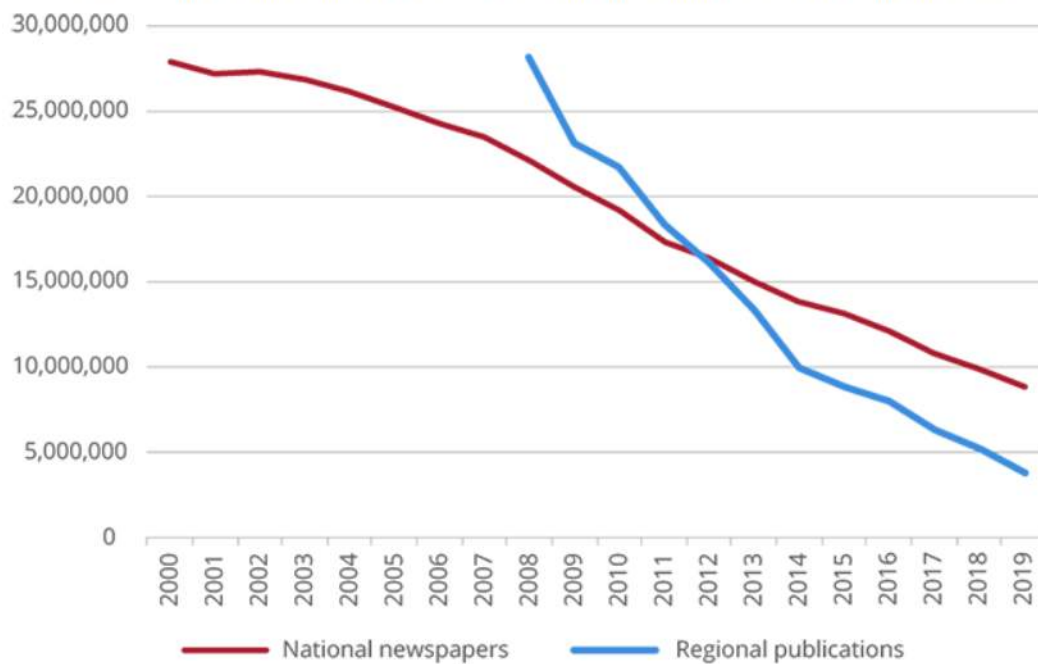
- Only 38 percent of UK adults accessed news via print newspapers;
- Only 11 percent accessed news via print magazines;
- 75 percent via accessed news via television
- 66 percent accessed news via the internet
- 43 percent accessed news via radio.

⁹ [Rise of 'virtual doctors' as one in 20 GP appointments performed online or by video - Manchester Evening News](#)

¹⁰ [Activity In The NHS | The King's Fund](#)

¹¹ [House of Lords - Breaking News? The Future of UK Journalism - Communications and Digital Committee \(www.parliament.uk\)](#)

Figure 1: Average circulation per issue, UK national newspapers and regional publications



Source: Audit Bureau of Circulations (ABC), 'ABC Data Hub', available at: <https://www.abc.org.uk/data>

Figure 2: Average circulation per issue, UK consumer magazines



Source: Audit Bureau of Circulations, 'Consumer Magazine Data', available at: <https://www.abc.org.uk/data/consumer-magazines>

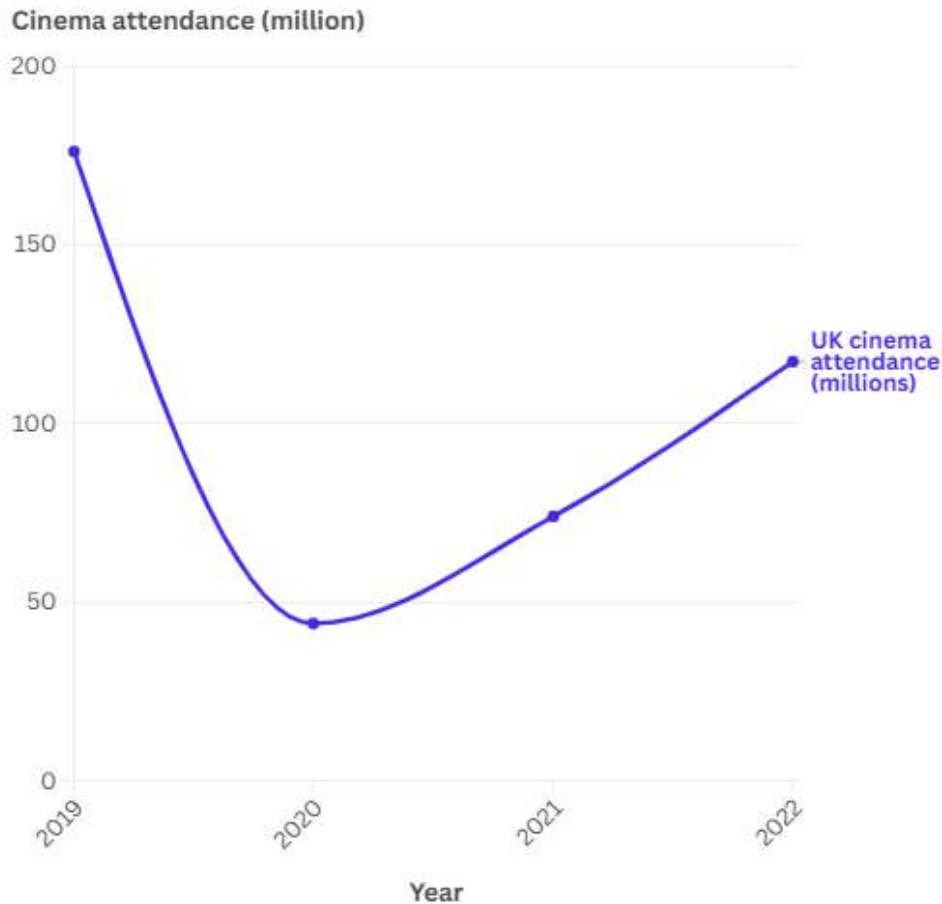
Cinema Attendance

- In 2019, cinema attendance was reported to be 176.1m annually.¹²

¹² [UK Cinemas face rapid closure and industry decline data shows](#)

- In 2022, cinema attendance was reported to be 117.3 annually.¹²
- This shows a 33.4% reduction in cinema attendance.¹²

UK annual cinema attendance



Source: [UK Cinema Association](#)

Source: UK Cinema Association as per NW Londoner¹²

TRICS Guidance Note on Changes in Travel Behaviour (August 2019)¹³

The TRICS guidance note supports the above trends in travel patterns, and outlines that these trends are not all a direct result of the COVID-19 pandemic. The report is based on travel trends up to 2018, which predates the pandemic by one year.

The following extracts from the report outline similar travel trends pre-pandemic.

The TRICS Guidance note sets out the following travel trends as of 2018:

- 16% fewer trips are made than in 1996;
- 10% fewer miles are travelled than in 2002;

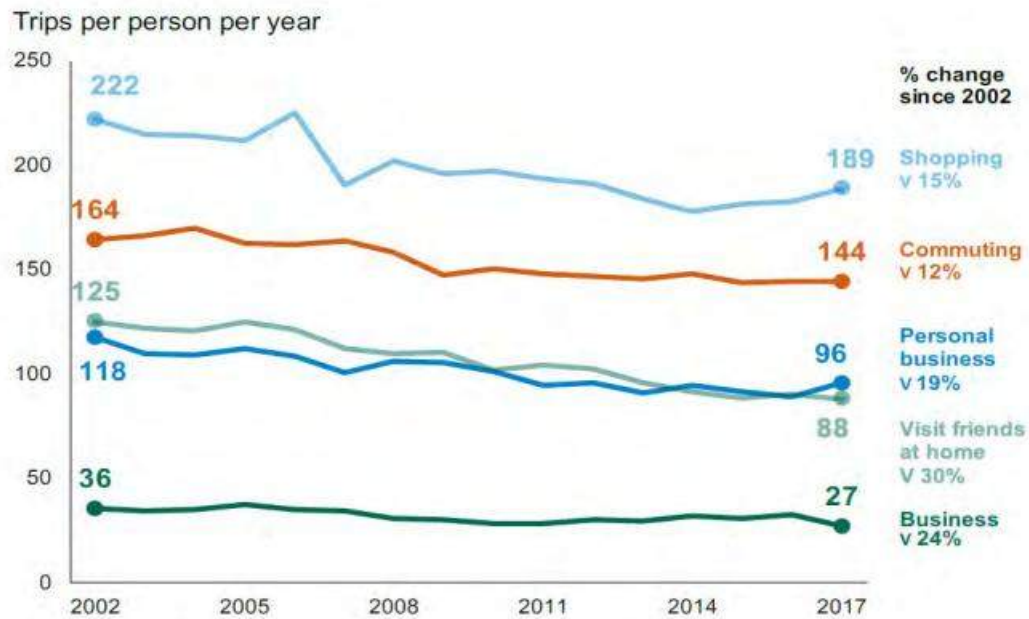
¹³ [TRICS Guidance Note on Changes in Travel Behaviour August 2019](#) (TRICS, 2019)

- 22 fewer hours spent travelling annually than in 2008.

National Travel Survey Report (2016)

- Total distance travelled per person per year fell by 9% between 2007 and 2016.
- Distance travelled by all private transport fell by about 13% since 2003.
- Distance travelled by car drivers fell by 10% since 2007.

TRICS trend analysis (2019)



The graph above shows a reduction in trips per person per year between 2002 and 2017 for the following purposes:

- Shopping: -15%
- Commuting: -12%
- Personal Business: -19%
- Visit friends at home: -30%
- Business: -24%

APPENDIX 3:

LANDSCAPE APPENDIX TO STATEMENT OF CASE

Statement of Case: Landscape Appendix.

In Respect of Outline Planning Application for up to 300 Residential Dwellings, Associated Access, Rail Station Car Park, Green Infrastructure and Sustainable Drainage Systems (all matters reserved except for access)

At Land off Longsight Road, Langho

On behalf of Hallam Land Management Limited

Date: 03 December 2025 | Pegasus Ref: P24-2318

PINS Ref: XX | LPA Ref: 3/2025/O196

Author: Andrew Cook BA (Hons) MLD CMLI MISEP Env





Document Management.

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1. Witness Particulars

- 1.1. My name is Andrew Cook and I hold a Bachelor of Arts degree in Geography (BA Hons) and a Masters Degree in Landscape Design (MLD). I am a Chartered Landscape Architect, Chartered Member of the Landscape Institute (CMLI), Chartered Environmentalist (C Env) and Member of the Institute of Sustainability & Environmental Professionals (MISEP) (formerly known as IEMA). I am one of the founding Executive Directors of Pegasus Group which was established in 2003. Since then, the company has grown, establishing sixteen offices across the UK, employing approximately 500 planning and environmental planning professionals and staff. I am the national head of the environmental planning service line. The company is a corporate member of the Institute of Sustainability & Environmental Professionals (MISEP) (formerly known as IEMA) and was a founding member of IEMA's Quality Mark scheme, under my direction.
- 1.2. I have gained over 35 years of landscape planning consultancy experience. Prior to Pegasus, I was an Environmental Director at RPS (formerly Chapman Warren Planning Consultants) where I specialised in addressing landscape planning issues which related to a wide range of projects. I have had considerable experience of and involvement in a wide range of residential projects throughout the UK, many of which have involved appeal sites in Green Belts as well as statutory protected landscapes including National Parks (NP), National landscapes as well as non- statutory landscape designations such as a Special Landscape Areas (SLAs), as 'valued landscapes'. I have presented evidence at public inquiries on many occasions to address various landscape planning, design and visual issues, and how these relate to landscape character and appearance.
- 1.3. I am based in the Cirencester office of Pegasus where I manage a team of 32 environmental planners and landscape architects. I and the landscape architects within my team at Pegasus undertake their work in compliance with the Landscape Institute's Code of Standards of Conduct and Practice for Landscape Professionals.
- 1.4. This landscape statement of evidence is based on my own professional judgement and is presented in accordance with the guidance of my professional institution, the content of which is true to the best of my knowledge and belief and is presented irrespective of by whom I am instructed.

2. Introduction and Scope of Evidence

Introduction

- 2.1. I am instructed on behalf of Hallam Land Management Limited, thereafter referred to as the Appellant, to present evidence relating to Landscape and Visual matters in respect of the appeal, submitted pursuant to Section 78 of the Town and Country Planning Act 1990, concerning development of Land off Longsight Road, Langho ("the appeal site"). This evidence should be read in conjunction with the Planning Statement prepared by Mark Saunders and other statements prepared by the Appellant.
- 2.2. I was not instructed to consider this matter until after the application was refused. I was specifically asked to advise whether I could professionally support the proposed scheme, and if so whether I would be willing to provide evidence to the inquiry. I can confirm that before accepting the instructions I considered the papers, visited the site, and specifically considered the work prepared by Mark Saunders – I thereafter confirmed that I was willing to act, and accepted instructions in this matter.

Background to the Appeal

- 2.3. A full summary of the background to the appeal is set out within the appellant's Planning Statement of Case.
- 2.4. The site consists of one large agricultural field at land off Longsight Road, Langho. The whole of the residential scheme is located within the administrative boundary of Ribble Valley Borough Council.
- 2.5. A comprehensive suite of technical reports and plans were submitted with the application in line with Ribble Valley Borough Council's validation requirements. The documents submitted during the course of the application are in the Core Documents List.
- 2.6. The full planning application for the site was received and validated and given the planning application reference 3/2025/0196. The Planning Case Officer prepared a report for the Planning Committee and recommended that the application should be refused.
- 2.7. This appeal follows the refusal by Ribble Valley Borough Council with regard to the application for planning permission for the following Proposed Development ("the appeal scheme"):

"In respect of outline planning application for up to 300 residential dwellings, associated access, rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access)"

- 2.8. The Decision Notice was issued on 27th June 2025 and included five Reasons for Refusal:

"1. ...

2. ...

3. The proposed development, by virtue of its overall scale and footprint, would result in the introduction of an incongruous, unsympathetic, and discordant form of

development, particularly when viewed from public vantage points along Longsight Road (A59) approaching the site from both the western and eastern directions, Public Footpath FP0606a which crosses the site and residential properties to the north of Langho village afforded direct views of the site. This would result in adverse, long term and permanent visual and landscape harm. The resultant impact fails to respond positively to the inherent visual and landscape character of the area contrary to Policies DMG1, DMG2, DME1 and DME2 of the Ribble Valley Core Strategy and the National Planning Policy Framework including paragraph 135.”

4. ...

5. ...

2.9. In light of the third Reason for Refusal, this statement addresses specific points raised as follows:

- Views from Longsight Road;
- Views from public footpath which crosses the site;
- Views from residential properties on the north side of Langho village;
- Effect on visual amenity;
- Effect on landscape character; and
- The effectiveness of the proposed mitigation.

Scope of Evidence

2.10. My Statement of Evidence addresses Reason 3 in the Decision Notice with regard to alleged harm to the landscape and the recreational value of the site. My Statement describes how I consider the proposed development would have a bearing upon the landscape character and appearance of the locality, as well as recreational value of the site. My conclusions of analysis in this Statement also form the basis of my separate Summary Statement of Evidence.

2.11. I rely upon the Statement of Common Ground/s (SoCG) where the parties have reached agreement. In preparing my evidence, I have additionally reviewed the following documents to inform my professional judgement:

- Decision Notice;
- Case Officer’s Committee Report;
- Application LVIA;
- Application Drawings;
- Relevant published landscape reports;
- Design and Access Statement;
- Planning Statement;
- Relevant planning policies; and

- Other Relevant Published Documents.

- 2.12. Where appropriate, I draw upon relevant information from these documents. However, in presenting my evidence and in the interests of brevity, I do not unnecessarily state detailed amounts of information where this has been previously documented. I have reviewed the application LVIA. I have also reviewed the scheme with reference to the application LVIA viewpoints surrounding the appeal site. I have set out my own analysis with regard to the scheme in this statement of case. Whilst I note that an LVIA was prepared for the application, in preparing for this Inquiry I have undertaken my own analysis which has assisted me in forming my professional judgements.
- 2.13. I note that there were no methodological concerns expressed in relation to the submitted LVIA – the differences between the authors of the LVIA and of the officer's report lay in respect of matters of judgment. I also note that at the time of determination there were no outstanding requests for additional information.

Representative Viewpoints and Visualisations

- 2.14. I consider the LVIA photographs to be representative viewpoints in the landscape surrounding the appeal site. It is anticipated that the Inspector would visit these representative viewpoints and use all the visuals including photomontages that have been provided as an aide memoire. As part of the appeal process I have taken the opportunity to provide further context photographs, in particular to illustrate the visual amenity associated with the public access across the site.
- 2.15. It should be recognised that it is not practical to include viewpoints from every possible location. I consider that the viewpoints which have been selected illustrate an appropriate range of visual receptors at different distances and directions from the appeal site. I also note that the viewpoints are largely representative of moving through the landscape and should not be considered to amount to static viewpoints. I consider that the locations of the viewpoints have obviously been carefully considered, and the photography was undertaken when atmospheric conditions and visibility were acceptable. I also consider that the photography is appropriate given the type and scale of development. The representative viewpoints and visualisations have been prepared mindful of the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) and its Clarification Note, however, it is recognised that there is no substitute for visiting the viewpoints in the field to gain a first-hand appreciation of the viewing context which will be appreciated by the Inspector.

Professional Judgement

- 2.16. Mindful of the recently published Landscape Institute Technical Guidance Note (LITGN) 2024-01 (August 2024) "Notes and Clarifications on Aspects" and the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). I have reviewed the scheme and visited the viewpoints as part of my field work and site visits. This has allowed me to ascertain both the landscape and visual effects and make informed professional judgements concerning these matters and establish the level and nature of change from a landscape and visual perspective. My assessment was based on summer views given the Inquiry timetable, however, I am mindful of winter views representing the worst-case scenario in terms of visibility which I have taken into account in my analysis and following my recent site visit.

- 2.17. The degree of landscape or visual effect is identified by means of a descriptive scale as per the GLVIA3 guidance. However, it is also necessary to consider the nature of the landscape and visual effects. GLVIA3, assists with regard to landscape effects, and paragraph 5.37 states that:

“One of the more challenging issues is deciding whether the landscape effects should be categorised as positive or negative. It is also possible for effects to be neutral in their consequences for the landscape. An informed professional judgement should be made about this and the criteria used in reaching the judgement should be clearly stated. They might include, but should not be restricted to:

The degree to which the proposal fits with existing character.

The contribution to the landscape that the development may make in its own right, usually by virtue of good design, even if it is in contrast to existing character.

The importance of perceptions of landscape is emphasised by the European Landscape Convention, and others may of course hold different opinions on whether the effects are positive or negative, but this is not a reason to avoid making this judgement, which will ultimately be weighed against the opinions of others in the decision-making process.”

- 2.18. With regard to visual effects, paragraph 6.29 states that:

“As with landscape effects an informed professional judgement should be made as to whether the visual effects can be described as positive or negative (or in some cases neutral) in their consequences for views and visual amenity. This will need to be based on a judgement about whether the changes will affect the quality of the visual experience for those groups of people who will see the changes, given the nature of the existing views.”

- 2.19. The effects upon the landscape are specifically considered in terms of effect upon landscape elements which helps inform landscape character and reflects the combinations of landscape elements. The statement also sets out how the proposal would have a bearing upon the visual amenity associated with the area. The proposed design includes green infrastructure which would be in character and in-keeping with the rural area. I am aware that people on the whole generally adopt an adverse reaction to change, particularly with regard to their local environments with which they are very familiar, irrespective of whether harmful or indeed beneficial (in whole or part). I have therefore adopted a precautionary approach here and as such, I consider that the proposed scheme would be adverse in terms of nature of effect in landscape character and visual terms unless otherwise stated. However, I note that there would be beneficial effects for some landscape elements.

- 2.20. I have reviewed the LVIA that was prepared for the application and note the effects that were identified with regard to landscape character and visual amenity. Notwithstanding this, I have undertaken my own professional assessment as to how the scheme would have an effect upon landscape elements, landscape character, visual amenity, and recreational value of the site. My assessment is based on a methodology.

- 2.21. In undertaking this exercise, there are some differences between my analysis and that of the original author (assessor) of the LVIA. However, both overall conclusions are not dissimilar.



Rule 6 Parties

- 2.22. I am not aware there is a Rule 6 Party with regard to this inquiry.
- 2.23. I am however aware of third-party objections made regarding the appeal scheme from members of the public, and therefore matters raised, where relevant, are addressed in evidence.

3. Description of the Proposal

Introduction

- 3.1. A detailed description of the proposals is set out in the application documentation including the Planning Statement and the Design and Access Statement (DAS). It is also set out at the start of the Officer's Report to Committee and addresses landscape in particular. I rely upon these detailed descriptions rather than repeating this information. Fully conversant with the proposals, I have set out my analysis and professional judgement. In this section of my statement, I proceed to comment upon some aspects of the proposal that are particularly pertinent to landscape character and appearance.

Proposed Residential Scheme & Green Infrastructure

- 3.2. The proposed development is for 300 dwellings together with green infrastructure forming an integral element of the overall scheme. The intention is to create a new residential neighbourhood set within a high-quality green infrastructure framework. The north-eastern corner of the site is characterised by a small woodland known as Green Nook Wood which would be retained. The scheme would include a small area of parkland in the south-eastern corner of the site which would be punctuated with a number of existing trees that would be retained and augmented with additional standard tree planting. The area would also accommodate a car park area for the adjacent railway station. Much of the southern boundary of the site would be framed by a landscape corridor, again punctuated with tree cover. Internally within the site running through its centre would be a north-south orientated landscape corridor which would accommodate existing tree cover complemented with additional tree planting.
- 3.3. The western most part of the site adjacent to Whitehalgh Lane would form a parkland setting between this lane and the proposed residential area. A second north-south orientated landscape corridor would weave through a residential area and accommodate a line of mature trees. The northern part of the site adjacent to Longsight Road would accommodate tree belts adjacent to the highway and areas of open grassland which would be seasonally wet forming surface water attenuation areas during the winter months.

Design Iteration at Appeal Stage

- 3.4. Subsequent to the scheme being determined, the appellant has proposed some minor modifications to the green infrastructure proposed as follows:
- The existing public footpath that runs through the site would pass through a proposed residential area. The configuration of the hard landscaping of this area, including access road and driveways, has been slightly adjusted to create a wider landscape corridor in order to accommodate the existing footpath alignment.
 - The northern boundary of the site would accommodate a tree belt running along its northern boundaries so as to provide a greater degree of physical and visual containment leaving the balancing pond areas in broadly the same locations.

Proposed Green Infrastructure

- 3.5. The design for the residential scheme includes green infrastructure that would provide a network of green spaces to reinforce the character of the local farmed landscape.
- 3.6. At a macro level, the proposed green infrastructure would ensure that the development would:
- Conserve and reinforce local landscape character;
 - Protect and enhance existing green infrastructure assets, namely the trees and hedgerows, so that they can be appreciated and valued by everyone for future generations;
 - Protect and create habitats to enable biodiversity habitats and flora and fauna species to thrive;
 - Provide a resilient and adaptive environment in the face of climate change; and
 - Protecting and enhancing landscape character and biodiversity by using land improvements and management to deliver biodiversity gain and overall landscape enhancement.

Northern Boundary Treatment

- 3.7. It is proposed that the northern boundary of the site adjacent to Longsight Road would accommodate a tree belt running continuously along the boundary, except for the vehicular access point and public footpath connecting onto Longsight Road. This woodland would connect into Green Nook Wood to the north-east and wrap around the north-western corner of the site which excludes a number of small field compartments.

Eastern Boundary Treatment

- 3.8. The northern part of the eastern boundary would retain the existing Green Nook woodland whilst the southern half of the eastern boundary would form a small parkland area designed to accommodate existing trees and complemented with additional tree planting, and as such would be able to accommodate and retain the existing footpath that runs diagonally through the site. For reasons of ecology, addressed by Mr Goodman, an appropriate means of enclosure in order to limit public access to it is proposed.

Southern Boundary Treatment

- 3.9. The majority of the southern boundary would form a landscape framework of grassland, shrubs, and trees to provide separation between existing houses on the south side of the railway line.



Western Boundary Treatment

- 3.10. The western-most part of the site framed on two sides by Whitehalgh Lane would accommodate existing trees and form naturalistic parkland punctuated with additional tree planting.

Central Open Spaces

- 3.11. Within the site itself there would be a principal landscape corridor orientated north-south running through the entire width of the site, connecting the northern boundary with the southern boundary and would accommodate existing tree cover which would be reinforced with further tree planting and would provide new pedestrian north-south routes through the site. A secondary north-south orientated landscape corridor would lie further to the west which is designed to accommodate a row of mature trees within green space.

4. Effect on Landscape Elements

Introduction

- 4.1. This section of my statement assesses the effects on those landscape elements (features) that currently characterise the site itself. It particularly considers the introduction of the new elements that make up the scheme and how these will physically affect the existing features present within the site. It also explains why the scheme would in overall terms result in a beneficial effect as far as some landscape elements are concerned.

Topography

- 4.2. The proposed development is residential in nature with green infrastructure. The footprints of the houses would be modest in size. Given the gentle, undulating nature of the site, the degree of cut and fill would be modest to accommodate the proposed layout together with the surface water balancing areas proposed. I consider that the overall magnitude of change to the ground profile of the site would be low. With a medium sensitivity combined with a low magnitude of change, the overall degree of effect on the topography would be minor (adverse).

Trees/Tree Cover

- 4.3. As illustrated in the Landscape Masterplan, there is significant tree cover in and around the site, a number of hedgerow trees within the internal hedgerows and small tree groups which would be retained as part of the green infrastructure. This would, however, be reinforced with new tree planting primarily comprised of standard trees located within hedgerows. A Detailed Planting Plan can be secured by means of a suitably worded condition. Overall, the magnitude of change is assessed as low, which, when combined with a high sensitivity, results in a moderate (beneficial) effect on the tree resource of the site.

Hedgerows

- 4.4. The scheme would involve minimal loss of hedgerows. The Landscape Masterplan shows the scheme would deliver a clear 'net gain' of hedgerows within the landscape areas, landscape corridors, and areas of public open space.
- 4.5. To accommodate the proposed site access, there would be as a result, a loss of a short section of the hedgerow along Longsight Road. It is anticipated that the existing hedgerow would be translocated, strengthened and relocated behind the visibility splays.
- 4.6. Additional hedgerow planting across the proposal presents the opportunity to introduce new native hedgerows throughout the development both within areas of public open space and associated with individual residential curtilages. The Landscape Masterplan prepared by Pegasus illustrates how new hedgerows could be accommodated within the site resulting in an overall net gain in the hedgerow resource and beneficial effects with regard to the hedgerow resource on the site, with a medium level of susceptibility, value and sensitivity combined with a high magnitude of change which would result in a major beneficial effect.

Land Use/Land Cover

- 4.7. The site currently comprises permanent pastureland. Whilst the proposed development would result in the loss of this pasture to accommodate the development area, the proposed scheme would create areas of naturalistic grassland including species rich grassland, wetland wet meadow associated with the surface water attenuation areas, native rich grasslands which are proposed across the areas of open space. The scheme would inevitably result in the loss of some permanent pasture. Given a low susceptibility, value and sensitivity, combined with a medium magnitude of change, the proposal would result in a moderate (adverse) degree of effect to the site itself. However, this needs to be balanced against the fact that a significant proportion of the proposal would introduce wildflower meadow areas with a condition to ensure their retention.

Public Rights of Way

- 4.8. There are a number of Public Rights of Way (PRoW) and footpaths in the locality and all those beyond the site would be physically unaffected with the scheme in place.
- 4.9. With regards to the on-site footpath (ref 606), no diversions of any footpaths are required to facilitate the proposed scheme with the existing route retained on its current alignment. PRoWs are considered to be high susceptibility, value, and sensitivity which when combined with negligible magnitude of change result in no physical degree of effect on the public routes as a resource and facility. Effects upon uses of these routes are considered elsewhere in this statement of evidence which deals with visual amenity and recreational amenity. The existing footpath across the site would be retained as part of the scheme to connect to existing PRoWs and in order to extend the PRoW network. With a high susceptibility, value, and sensitivity which when combined with a negligible magnitude of change, would result in a negligible (beneficial) degree of effect with regard to this resource.

Water Features

- 4.10. The proposed scheme would include two surface water attenuation areas within the northern part of the site which would form shallow scrapes and be managed as seasonally wet grassland designed to be naturalistic in character and would provide sustainable blue infrastructure for the proposal. Based on a medium susceptibility, value, sensitivity, and a medium magnitude of change, this would result in a moderate beneficial degree of effect.

Summary of Effects upon Landscape Elements

- 4.11. In overall terms, whilst significant parts of the site would change from undeveloped to developed, it is important to note that the scheme would result in some beneficial effects with regard to the landscape elements that currently define the landscape character of the site. The site would change from pastoral fields to a high-quality design residential neighbourhood set within an attractive substantial landscape framework. The elements that currently contribute to defining the character of the site, namely trees, shrubbery and hedgerows would all be strengthened and form more prominent elements in the medium and longer term, but I recognise this would be in the context of a new residential neighbourhood.

Landscape Character of the Site

- 4.12. Collectively, if one draws the different elements of the site together, it defines the overall character of the site itself. In summary, the site is characterised by field boundaries but is significantly influenced visually by the adjacent dwellings and Longsight Road. The site is framed to the south and east by residential areas and by the busy highway, Longsight Road, to the north and is currently significantly affected by the substantial urbanising influences of other adjacent development. I also note that this includes the adjacent railway line which accommodates both passenger and freight rail. The site, in terms of its character, appears as an urban fringe edge of Langho settlement environment.
- 4.13. The scheme would introduce a high-quality residential built environment which would be in keeping with the local settlement and character area and therefore, is not at odds or out of character or appearance with its context. However, adopting a precautionary approach the proposals would result in an overall adverse effect in landscape character terms. The proposal would accommodate significant new green infrastructure which would replace several pastoral fields and again change this character of the site to be more representative of the local landscape character area and therefore would result in some beneficial effects at the site level.
- 4.14. The boundaries of the site are on the whole, framed by a combination of built form and mature vegetation, which provide a sense of visual containment and enclosure associated with the site. Indeed, the extent of enclosure is notable.
- 4.15. The existing residential curtilages are close to the site's southern boundary which creates a strong sense of physical and visual connection between the current settlement edge and the adjacent parts of the site. The settlement boundary is currently defined by an ad-hoc arrangement of vegetation and fencing along the site boundary and railway line and as such this forms a harsh urban edge. The proposals would provide a much more robust landscape framework to a new northern settlement boundary.
- 4.16. At the site level, with a low susceptibility (given its urban fringe character), value and sensitivity combined with a high magnitude of change would result in an overall moderate (adverse) effect in landscape character terms.

5. Effect on Landscape Character

Introduction

- 5.1. This section of my statement explains how the scheme would have a bearing upon the landscape character of the surrounding area. As defined in the GLVIA glossary landscape character is defined as “A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different to another...”.
- 5.2. To further clarify a distinction in the use of terms, Landscape Character Areas (LCAs) are discrete geographical areas of a particular landscape, as opposed to Landscape Character Types (LCTs), which are defined in GLVIA, page 157 as follows:

“These are distinct types of landscape that are relatively homogeneous in character. They are generic in nature in that they may occur in different areas in different parts of the country, but wherever they occur they share broadly similar combinations of geology, topography, drainage patterns, vegetation and historical lands use and settlement pattern, and perceptual and aesthetic attributes.”

- 5.3. A number of landscape character assessments have been undertaken in recent years to identify both **Landscape Character Types (LCTs) and Areas (LCAs)** as defined above and have been published to assist professionals in understanding how decisions can affect landscape character.
- 5.4. I have provided some narrative here in this section to explain how the proposed scheme would have a bearing upon the wider landscape character of the area beyond the site.

National Level – National Character Area 35–Lancashire Valleys

- 5.5. The site and the surrounding area of Langho are located within the National Character Area 35–Lancashire Valleys. This NCA forms part of an assessment of the character of England’s landscape, first undertaken by the Countryside Agency but now the responsibility of Natural England.
- 5.6. The document provides a summary of the NCA and identifies the key defining characteristics of the landscape as follows:
- ***“Broad valleys of the rivers Calder and Ribble and their tributaries run northeast to south–west between the uplands of Pendle Hill and the Southern Pennines.;***
 - ***A Millstone Grit ridge extends between the Ribble and Calder catchments (including the Mellor Ridge and part of Pendle Hill).;***
 - ***A broad trough underlain by Carboniferous Coal Measures provided the basis for early industrialisation;***
 - ***Field boundaries are regular to the west and more irregular to the east. They are formed by hedges with few hedgerow trees and by stone walls and post and–wire fences at higher elevations.;***

- *Agricultural land is fragmented by towns, villages and hamlets, industry and scattered development, with pockets of farmed land limited to along the Ribble Valley, the fringes of Pendle Hill, the area to the west of Blackburn, and in the north around Skipton.;*
- *Farmed land is predominantly pasture for grazing livestock, with areas of acid and neutral grassland, flushes and mires. There is some upland heath and rough pasture on Pendle Hill and the higher land to the south;*
- *Small, often ancient, broadleaved woodlands of oak, alder and sycamore extend along narrow, steep-sided cloughs on the valley sides – for example, at Priestley Clough, Spurn Clough and south of Blackburn. Traditional stone-built weavers' cottages;*
- *There are numerous large country houses with associated parklands, particularly on the northern valley sides away from major urban area*
- *The many towns, including Blackburn, Accrington and Burnley, which developed as a result of the Industrial Revolution give the area a strong urban character.*
- *Robust Victorian architecture of municipal buildings contrasts with the vernacular sandstone grit buildings of the quiet rural settlements on the valley sides.*
- *Numerous communication routes run along the valley bottoms, including the Leeds and Liverpool Canal, the Preston–Colne railway and the M65 motorway.”*

5.7. All of these key defining characteristics would continue to remain and prevail beyond the immediate visual environs of the site where effects would effectively be negligible.

5.8. With regards to Statements of Environmental Opportunity, SEO2 and 4, have guided the strategic landscape and visual advice with regard to the design of the development layout and state the following:

- **“SEO 2: Increase the resilience and significance of woodland and trees and manage and expand existing tree cover to provide a range of benefits, including helping to assimilate new infrastructure; reconnecting fragmented habitats and landscape features; storing carbon; and providing fuel, wood products, shelter and recreational opportunities.**
- **SEO 4: Conserve and manage the distinction between small rural settlements and the densely urban areas and ensure that new development is sensitively designed to contribute to settlement character, reduce the impact of the urban fringe and provide well-designed green infrastructure to enhance recreation, biodiversity and water flow regulation.”**

5.9. In addition, a number of landscape opportunities are also set out within the NCA. These include the following which have guided the masterplan and are reflected in the landscape strategy:

- *‘Protecting, conserving and enhancing the mosaic and diversity of existing woodlands, especially ancient semi-natural woodland, and improve their connectivity*

- *Managing and restoring hedges and field boundary trees and connecting to existing fragmented and degraded habitats.*
- *Bringing the area's small broadleaved woodlands, particularly on farms, into management, focusing on the visually important clough and ridgeside woodlands on the lower hillsides and the wet woodlands in the valley bottoms, and focusing on farm shelter plantings and copses that are distinctive to the industrial foothills and valleys.*
- *Ensuring that new woodland strengthens the local landscape and enhances biodiversity, providing recreational opportunities where possible.*
- *'Designing in' green infrastructure principles with housing expansion*
- *Improving the urban-rural fringe through careful design and integration of green infrastructure with housing and industry, through linking new developments with the wider countryside and sustainably manage urban activities within agricultural areas.'*

- 5.10. The evidence base provided within the NCA description provides a useful contextual overview of the wider landscape character and the SEOs provide a framework for design considerations for the Site. This scale of assessment, however, is of limited assistance in considering landscape impacts due to its broad coverage.
- 5.11. Although the document has been reviewed as part of the baseline study, it is not necessary to assess the effects of the proposed development on landscape character at this national scale. The development (contiguous with the urban edge) is of such a relatively small scale that it is not considered to have the potential to result in any noteworthy effects to the host national landscape character area.
- 5.12. The scheme would accord with these broad strategies. With regard to this, the proposal would protect and maintain general views of the village seen from the surrounding countryside as well as general panoramic vistas across the NCA. The proposal would also retain and enhance the strong hedgerow field pattern. It would maintain the character and views from and into the village in general terms and the design has ensured that the locally distinctive vernacular is respected and reflected in the proposed scheme as set out in the DAS.
- 5.13. The overall key characteristics reveal a settled and farmed landscape with many specific references to built infrastructure and individual settlements. This NE document is inevitably a high-level character assessment, which provides a useful overview by which to understand the character of the local landscape and its surroundings. At this higher level, it is considered that the scheme would bring about negligible change to the key characteristics of this NCA beyond the site. At the character area level, this landscape would have a medium susceptibility and a medium value resulting in a medium sensitivity, which combined with a negligible change of magnitude would result in a negligible degree of effect as a consequence of the scheme being in place. The proposal would be in keeping with the character of the adjacent settlement and would be in accordance with this NE landscape strategy.

Landscape Strategy for Lancashire Landscape Character Assessment

- 5.14. The Landscape Strategy for Lancashire Landscape Character Assessment (LCC, 2000) identifies 21 Landscape Character Types (LCT) which are then identified as geographically

specific Landscape Character Areas (LCA) which share similar characteristics within the county. The Site falls within Character Area 5C: **Lower Ribble** and the **Undulating Lowland Farmland Landscape Type 5C**.

5.15. The Undulating Lowland Farmland Landscape LCT is described as follows:

“Generally below 150m, the Undulating Lowland Farmland lies between the major valleys and the moorland fringes. The underlying geology is largely masked by heavy boulder clays and hedgerows predominate over stone walls. This lowland landscape is traversed by deeply incised, wooded cloughs and gorges. There are also many mixed farm woodlands, copses and hedgerow trees, creating an impression of a well wooded landscape from ground level and a patchwork of wood and pasture from raised viewpoints on the fells. Some of the most picturesque stone villages of the county occur within this well settled landscape type. The towns of Longridge and Clitheroe also occur within this type but are not typical of the settlement pattern. The area also has many country houses whose boundary walls and designed landscapes add to the species diversity and visual appeal. There is a high density of farms and scattered cottages outside the clustered settlements, linked by a network of minor roads.”

5.16. The Site falls within LCA 5C: Lower Ribble which is then described as follows

“The Lower Ribble is an area of lowland gritstone farmland between Longridge Fell to the north and Mellor Ridge to the south. It has a distinctive broad valley landform; the north and south valley sides are separated by a flood plain which contains the meandering course of the River Ribble. There is a particularly distinctive pattern of wooded cloughs which descend the valley sides, their streams emptying into the Ribble. A complex pattern of hedges and woodland form links to these wooded cloughs, giving an overall impression of a well wooded landscape. Although a rural valley, the area is well settled; a dense network of winding country lanes and tracks link the large number of stone farm buildings. Other features of this area are the country houses and designed landscapes, for example Stonyhurst College, Huntingdon Hall and Showley Hall. The Roman settlement of Ribchester is sited at an historic crossing point of the Ribble, a tranquil village in the centre of the valley. ”

5C Undulating Lowland Farmland: Lower Ribble

5.17. The Lower Ribble is described as having a broad valley landform separated by the valley floodplain of the River Ribble and its meandering course. There is a particularly distinctive pattern of wooded cloughs which continues to the north of the Site traversing the wider broad valley. When combined with the complex hedge lined medium scale field pattern this varies the levels of enclosure and overall provides a well wooded landscape pattern.

5.18. Despite being a rural valley, the area is well settled with a dense network of winding lanes linking the many dwellings and farmsteads dispersed throughout the area. The presence of settlements and nearby suburban character of clustered settlements lining the A59 transport corridor also exert a strong influence over this character area. Langho as a settlement extends north-eastwards to the Whalley Road roundabout and includes a residential neighbourhood which is accessed by means of a residential road called Northcote Park. This extends as far north as Longsight Road. To the east of this is a further area of residential development east of Northcote Road. The proposed development would not extend the settlement any further north than what currently exists extending up to Longsight

Road. Road users travelling along Longsight Road (the A59) are aware of Langho as they travel past Northcote Park residential area. Furthermore, the general disposition of settlements across the area would not change with the proposed scheme in place. Salesbury lies to the west of Langho, separated by countryside, and similarly, Billington, Whalley and Nethertown all lie some distance to the east of Langho separated by countryside. These spatial relationships between these settlements would remain with the proposed development in place.

- 5.19. The River Ribble forms the northern extents of this character area (Valley Floodplain LCA) and the study area. The course of the river is largely well enclosed by woodland and so forms the backdrop to views looking north from adjoining character areas which limits its presence in the wider landscape in particular to the south of the A59.
- 5.20. The same undulating farmland character continues to the east and west of the Site's immediate context which is interrupted by the suburban character of Wilpshire to the south-west and to a lesser extent, the village of Billington to the north-east.
- 5.21. The farmed ridges of the south side of the Ribble Valley overlook the character area which appears as a patchwork of wood and pasture from raised viewpoints on the fells above Langho.
- 5.22. The A59 divides the more settled south side of the character area from the predominantly rural farmed areas to the north. Most built infrastructure in the district is located within or set close to this corridor which forms a break in character and zone which is considered to be of lower overall sensitivity. Whilst both the landscape either side of the Site and in the farmland to the north have some notable landscape features these are largely commonplace structural landscape elements, namely field boundary hedgerows and woodland blocks. These elements that provide the wider context for the Site will be fully retained so as not to be physically affected by the change in character experienced at the Site and its immediate context.
- 5.23. The largely undesignated landscape of the character area is comprised of commonplace elements but does present some locally distinctive features of scenic value which together provides an overall medium value.
- 5.24. Looking at in the round, the susceptibility of Character Area 5C: Lower Ribble, is assessed as medium. A combination of medium value and medium susceptibility results in a sensitivity of Medium.
- 5.25. Within the wider character area, the proposed development would be perceived as a northern extension to the settlement edge of Langho, and in particular a western expansion of the recently constructed Pringle development. Due to the nature of the landscape and the size and scale of the proposed development, it would be visible from areas within the character area, including the adjacent rural landscape to the north, west, southeast and south-west, along a short section of Longsight Road (A59) in both directions, from the adjacent residential development to the east, and for a few north facing properties at the edge of existing built form of the settlement. The development proposals, however, would not be out of character with the locality, with similar built elements surrounding the Site and located throughout the character area. Therefore, the proposals would not constitute an especially notable adverse element within the wider landscape. In this regard it is noted that the geographical extent of the landscape which would experience the identified long-term effects of the development is generally already partly influenced by development.

- 5.26. The proposed development would represent a Moderate alteration to baseline character introducing built elements that may be prominent in some localised situations but not necessarily substantially uncharacteristic with the attributes of the receiving landscape where similar development is seen in close proximity, but which could nevertheless co-characterise parts of the landscape. The magnitude of change is assessed as high resulting in a **major adverse** level of effect with regard to the site itself. However, as existing and proposed vegetation matures, this effect upon landscape character would reduce in the medium and long term.

Site Landscape Character

- 5.27. As previously described, the character of the Site is formed by gently sloping pastures, central wooded watercourse, scattered mature trees and field boundary hedgerows. The Site is semi-enclosed by woodland blocks to the south-east and north-west and native hedgerows on the northern, eastern, and western boundaries which provide some visual separation between the Site and agricultural land to the north and immediate west. The southern boundary is slightly more open, where some existing residences at the edge of Langho are afforded views over the Site and to the far side of the valley.
- 5.28. The character of the Site is influenced by adjacent residential development to the east and lower lying agricultural land to the north, as well as equivalent farmland to the immediate west. It is also affected by the wider surrounding rural landscape set beyond the village settlements. The boundary hedgerows are dense with the exception of parts of the southern boundary, which includes open sections with little vegetation. The field boundary hedgerows present on three sides of the Site are a common feature in the wider landscape which is mainly well enclosed in contrast to the Sites open internal boundaries following hedgerow removals and their replacement with post and wire fence lines.
- 5.29. The Site is not covered by any designation that recognises a specific landscape or scenic importance. However, it does have some recreational value as it provides a public footpath route (FP6) which links Langho to the wider PRoW network within the Ribble Valley. The Site contains some elements of value, namely the boundary hedgerows and individual trees which provide some visual connectivity to the wider landscape beyond its boundaries. It is considered therefore, that the landscape value of the Site is **medium**.
- 5.30. Overall, as an area of settlement fringe agricultural pastureland type with a medium value and medium susceptibility, the character of the Site is therefore considered to be of **medium** sensitivity.
- 5.31. The character of the Site is influenced by both built form and agricultural uses. The proposed development would result in an inevitable change to the character of the Site, along with localised effects. Effects relate to a change in the current land use from undeveloped fields for the majority of the Site area, to residential development with associated infrastructure. It is acknowledged, however, that the proposed layout means that the site would retain most of its valuable features in the form of boundary woodland and hedgerows and individually important trees.

Farmed Ridges: 7A Mellor Ridge

- 5.32. To the south and set above Langho is the Mellor Ridge of the Farmed Ridges Landscape Type. This is a distinct area with a ridge profile and steep side slopes which separates them from the adjacent lowland landscapes. The wooded sides form distinctive points of orientation from the lowland landscape. The landscape is a mosaic of mixed farmland and woodland which provides a vegetative backdrop to the surrounding lowlands inclusive of the Site. Langho is one of several clustered stone villages with scattered outlying stone cottages and farmsteads dispersed along local roads, along with more recent development following main roads often less in keeping with wider character. The ridges also host local reservoirs such as those above Langho and communication masts and occasional wind turbines.
- 5.33. The SZTV demonstrates the constrained visibility towards the Site from higher ground within the ridge due to the enclosure of the settlement of Langho directly to the south. Oblique views are likely possible either side of settlement from the PRow network. However, woodland at the west side of Langho and the recent development to the east alongside existing woodland screening does preclude most viewing opportunities to the east and west of Langho until reaching higher vantage points where the Site reveals itself, set within wide panoramic views looking north over the Ribble Valley. The development would only slightly increase the perception of built form within Langho from higher ground as it would be interspersed by vegetation breaking up its visible elements and there would be limited opportunities to experience the changes such that it appears as a natural extension bound by the road corridor (A59). Langho, as a settlement, sits on the southern slopes of a wide valley formed by the river Ribble across the vale of which, further to the north, the land rises again. With the proposed scheme in place, the character of the surrounding valley landscape associated with the river Ribble would be negligible in terms of overall degree of effect.
- 5.34. Although this agricultural landscape is predominantly rural in nature, the surrounding residential uses influence its value (medium) and susceptibility (medium) to change and therefore, on balance, these areas have been assessed as having a medium sensitivity.
- 5.35. With the proposed scheme in place there would be a negligible magnitude of change to this landscape type resulting in a negligible adverse degree of effect.

Summary

- 5.36. As far as landscape character is concerned, I acknowledge that the site itself would see some considerable change from several pastoral fields. However, the baseline that needs to be taken into account here is that the proposed scheme is framed by housing, a rail line and roads. No significant off-site works are proposed and as such the character of the local landscape beyond the site in both physical and experiential terms would remain materially unchanged with the scheme in place.
- 5.37. I recognise that the scheme would bring about an inevitable change to the character of the application site itself, however, such a change would, in physical terms, be predominantly confined within the application site boundaries. Off site, the pattern of the land cover, tree and hedge cover and agricultural mix, undulating topography, the variety of building materials, Langho's settlement pattern as identified in the various published reports, would all continue and prevail with the scheme in place. Consequently, it is considered that those key characteristics of the wider landscape and settlement beyond the application site boundary as identified above would be physically unaffected with the scheme in place. It is only the

experiential factors of character, both visual and audible elements that would be influenced to some limited degree locally. Any noise associated with the habitation and use of this scheme would be negligible in the wider landscape and settlement context particularly given the nearby roads. The scheme would not change the broad character of the wider area as the 'settled agricultural scene', which would continue to prevail with the scheme in place. The sensitive design of the proposed scheme would reflect the local settlement character of Langho. Any such effects would be highly localised, therefore.

- 5.38. I proceed to consider the character of the landscape at the site level i.e. with regard to the site itself. The site is currently pastoral land. The boundary of the site is in the main, framed by a combination of mature hedgerows and standard trees, which provides a strong sense of visual containment and enclosure associated with the site. There are significant urbanising influences associated with the site including housing. There are a number of residential areas which are close to the site's southern and eastern boundaries which reveals a strong sense of physical and visual connection between the settlement of Langho and the adjacent areas of the site. The site does accommodate some features such as trees and hedgerows, which contribute to the defining characteristics of the locality, but all of these elements would be retained, and their presence reinforced with the green of structure proposals as an integral part of the scheme.

6. Effect on General Visual Amenity

- 6.1. To reiterate, character and appearance are two different aspects. The physical character of the surrounding landscape would remain unaltered with the scheme in place.
- 6.2. In order to gain a better understanding of the extent and nature of the change brought about by the scheme on the appearance of the local landscape, I examine the effect of the proposed scheme on the general visual amenity of the landscape and the perception of those visual receptors (people) using the landscape.
- 6.3. My assessment relates to the representative LVIA viewpoints and additional context viewpoints.
- 6.4. Visual amenity is defined on page 158 in the Glossary of Guidelines for Landscape and Visual Impact Assessment – Third Edition (April 2013) as:

“The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.”

- 6.5. The LVIA analysis demonstrated that much of the landscape within the locality would be visually unaffected by the proposed scheme. In reality, the actual visual envelope from where the proposed scheme would be seen would be very limited and highly localised owing to the layering effect of vegetation, principally the extensive woodlands in the intervening landscape between the visual receptor (person) and the site boundary. Detailed analysis is set out in the LVIA and visualisations which I do not repeat in my statement. Notwithstanding this analysis, I have undertaken my own analysis to provide further context to this LVIA analysis.
- 6.6. The appreciation of views from the countryside is mainly gained from vantage points accessible to the public. The two main ways in which members of the public can gain an appreciation of views when in the countryside are primarily from public highways and by using the various rights of way that pass through the landscape.
- 6.7. Within the local area, beyond the A59 corridor, the network of public highways is limited. It includes a number of unclassified roads that connect the various settlements in the landscape. The typical character of these minor roads tends to be narrow with hedgerows, hedgerow trees and built form situated immediately beyond the metalled surface of the carriageway. Consequently, within the local landscape the presence of such roadside vegetation and built form means that a road user using these highways often has only a restricted opportunity to gain views of the countryside. The view of the user is most often channelled along the lane itself in the direction of travel. The user's appreciation of the wider countryside is very much limited to the direction of travel and to a narrow landscape corridor associated with the highway in front of the vehicle. Thus, the opportunity to gain a panoramic appreciation of the landscape and of the proposed residential scheme within the site would be very restricted.
- 6.8. The detailed analysis is set out within the LVIA. I comment here to provide a further narrative to that analysis. There are a number of public highways and public access routes in the vicinity of the site which I proceed to address with regard to the cardinal points of the compass.

Views from the Countryside to the North

- 6.9. Forming the northern boundary of the site is Longsight Road. From this major highway, the A59, there would be views of the proposed scheme where the road is adjacent to the site which forms a short section of this highway which runs north-eastward to Skipton to Preston in the south-west and accommodates a high volume of traffic. Immediately east of the site in the vicinity of Green Nook wood the proposed scheme would fall from view and not be visible due to the presence of this woodland and adjacent residential area to the east of the site. A public footpath passes across the site which enables people to gain access between the Longsight Road to the north and Langho south of the railway line.
- 6.10. Similarly, west of the site, the proposed scheme would not be visible from this highway due to the presence of a complex of buildings and tree cover and vegetation adjacent to the south side of this highway. Initially there would be open views from the A59 where it runs alongside the site as it is currently flanked by a low continuous hedgerow. However, it is proposed that a tree belt would be planted along the northern boundary except for the vehicular access point into the site and the existing public footpath. With the establishment and maturity of the tree belt, the proposed scheme would not be visible from this highway except fleetingly through these 2 access points. I regard the roadside pavement as a road user category given the focus is to walk along this footway in the context of a busy highway.
- 6.11. To the north-west of the site lies a country lane known as Chapel Lane which is broadly orientated north-south running northwards to Old Langho. This highway is flanked by mature hedgerows and trees with occasional gaps as field access points and as such, there would be very limited opportunity to observe the proposed scheme from this highway.
- 6.12. With regard to PRowS, there is one public footpath extending across the countryside to the north of the site which extends from Monks Barton to the south, with Lower Fold Farm to the north. Given its orientation together with its low elevation and tree cover in the intervening landscape, there would be little opportunity to observe the proposed scheme from this public footpath, and it is notable it is not referenced in the specific reason for refusal.

Views from the Countryside to the East

- 6.13. There is a network of roads to the east of the site converging on a major roundabout on the A59. Northcote Road lies to the north of this junction. The A59 straddles eastward and westward of the junction. The A666 extends southward from this junction to run through Langho whilst a further country lane, Whalley Road extends from the roundabout north-eastwards to connect into the village of Whalley. Given topography, built form with residential properties and vegetation, there would be no opportunity to observe the proposed scheme from the highways to the east of the site.
- 6.14. There is a network of PRowS to the east of the site which form local public footpaths. The majority of these routes would be visually unaffected due to topography, built form and vegetation screening the proposal on this routes. Where observed, the scheme would have a negligible degree of effect upon views given the existing viewing context of these footpaths locally, and particularly in the context of observing the village of Langho.

Views from the Countryside to the South

- 6.15. There are a number of residential roads a short distance to the south of the site, within the settlement where there would be little opportunity to observe the proposed scheme. There is also a network of main roads through the village and across the countryside to the south of the settlement, however due to topography, built form and vegetation these routes would be generally visually unaffected by the proposals.
- 6.16. There is a network of public footpaths to the south of Langho on the site with a long-distance waymarked route known as the Ribble Valley Jubilee trail which passes over a local ridgeline to the south of the site but sits on a broad ridge of local high ground such that it would be generally visually unaffected by the proposed scheme.
- 6.17. Immediately to the south of the site is a railway line linking Blackburn (and thence Manchester) to the south with Clitheroe to the north and indeed there is a station immediately to the south-east of the site with associated platforms. From this station and a short section of railway line adjacent to the site, the proposed scheme would be visible but would be observed in the context of the adjacent existing Langho settlement. For train passengers along this route, visual effects would be restricted to a very short length of the rail route, and the change would be very limited.

Views from the Countryside to the West

- 6.18. Immediately to the west of the site lies Chapel Lane which effectively forms the boundary of the site. This is framed by topography in a local cutting which passes under the railway line, tree cover and hedgerows, roadside banks which would limit the opportunity to observe the proposed scheme, though there would be a few locations where there would be fleeting, framed views from field access points.
- 6.19. There are a few public footpaths west of the site, though due to topography, tree cover and built form, these routes would be generally visually unaffected with few locations where the proposed scheme would be visible and form a small element in the local viewing context.

PRoW Across the Site

- 6.20. The indicative layout plan shows that is proposed to retain the footpath, referenced 606, across the site, albeit with a diversion towards the northern section. This diversion would require a legal order and a suitable diversion route to be divided around the balancing pond areas. I note that the layout is a reserved matter such that the indicative layout may change, at that stage. The majority of the current alignment of this route would be retained and accommodated by the proposed design of the neighbourhood and green infrastructure.
- 6.21. The footpath is reasonably well used by the local community. Use of this route provides open views across the site. I note from the work undertaken by Mr Blair that most of those using the footpath travel to and from the direction of the railway station towards the A59. Only a handful of users cross the A59 to the wider footpath network to the South, and no-one was noted to be travelling to and from the A59 (i.e. with an origin to the South of the road). The same survey noted that a small minority of users did not stick to the public right of way – and indeed some even travelled into the area of woodland. Since this latter activity comprises acts of trespass I afford this limited weight in assessing the effect upon such receptors, however, it does evidence that there is a desire on the part of some parts of the public to

use a wider area of land close to the existing settlement, which will, in part be addressed by the proposals for a generous area of open space located to the immediate north of the railway station.

- 6.22. With the proposed scheme in place, the public right of way would in future pass along a generous landscape corridor through part of the residential scheme whilst the southern section of the path would pass through naturalistic parkland landscape, with the opportunity to wander beyond the path and into the area of open space. Clearly the visual context of that experience would change. The current context comprises an open field with a backdrop of existing houses both to the east and south of the site. With the scheme in place, there would be views of the housing across the site. A high-quality design with regard to the residential neighbourhood and green infrastructure would ensure that the landscape would be attractive and the housing sympathetic in design terms reflective of the local area. With a high susceptibility, medium value, high sensitivity, and a medium magnitude of change there would be a major adverse visual effect with regard to users of this route through the site.

Summary of Visual Effects

- 6.23. It is evident from the LVIA and the visual analysis I have undertaken for this statement that the proposed development would be visually well contained due to surrounding woodland, tree cover and the settlement of Langho, and in due course, the proposed mitigation. The proposed development would be set within a series of existing fields within a wider field pattern where field boundaries are demarcated by established hedges and tree cover. Substantial tree cover frames much of the site. Based on the Viewpoint Assessment, it is evident that the proposed scheme would be well contained as a result of topographical variation in the local landscape, vegetation screening including hedgerows, woodland and tree cover, roadside vegetation, as well as existing residential areas. The majority of the visual receptors would be highly localised, i.e. those who are generally within or close to the site and its perimeters. More distant views across the landscape towards the site would see the proposed scheme in a wider valley context associated with Langho village and viewed as a minor addition to the settlement. The majority of the identified and assessed viewpoints and receptors would not be subject to a major degree of visual effect. Indeed, the majority of the visual effects would be negligible to minor in terms of scale of effect.
- 6.24. It is anticipated that the tree belts would frame the screen once established as would the green infrastructure generally which would increase the degree of visual containment of the scheme from the surrounding countryside and settlement in the medium and longer term.

7. Effect on Residential Visual Amenity

- 7.1. I note that residential visual amenity as a specific concern is raised in the decision notice. However, the officer's report to committee did not consider this matter to be of sufficient concern to be raised as a reason for refusal. However, I am aware that some local residents have made representations with regards to the application raising residential amenity as a matter from their prospective. In light of this and the reason for refusal, I have therefore considered the matter of residential visual amenity and set out my analysis in this section.
- 7.2. It is right to make a distinction between residential and general visual amenity. The latter term from a planning policy perspective usually relates to the public realm and the wider landscape whilst the former is concerned with the private visual amenity of an individual residential property.
- 7.3. Planning decisions proceed on the basis that no individual has the right to a particular view and that an unwelcome change in that view is not of itself a concern of the planning system. Nonetheless, past decisions make it clear that there does come a point where, by virtue of the proximity, size and scale of a given development, a residential property or properties would be rendered so unattractive as a place in which to live that planning permission should justifiably be refused. The test relates to the position which would pertain with the proposed scheme in situ, irrespective of the position beforehand. In other words, the test is not whether, in relative terms, a property would become a substantially less attractive place to live, the test is whether viewed objectively and in the public interest, a property would become an unattractive place in which to live. Such a situation, if left unchecked, would lead clearly to undesirable consequences. It is useful to pose the question:
- “Would the proposal affect the outlook of these residences to such an extent, i.e., be so unpleasant, overwhelming and oppressive that this would become an unattractive place to live?”***
- 7.4. The test of what change would be unacceptably impactful to residential amenity to become a matter of land use concern to a decision maker should be an objective test, albeit that professional judgement is required in its application to the circumstances of each particular case. There needs to be a degree of harm over and above an identified substantial adverse effect on a private interest to take a case into the category of refusal in the public interest. It follows that such a change, to amount to a determinative issue in a planning decision would be a rare eventuality. Mere change in the outlook from within a property is patently not sufficient; indeed, even a fundamental change in outlook is not necessarily unacceptable.
- 7.5. It is worthy of note that the visual component of residential amenity should be addressed “in the round” taking into account factors such as distance, the direction of the view, the size of the residential scheme and its layout, the layout of particular dwellings in terms of their floor plans, their garden environment, and the lines of sight towards the scheme.
- 7.6. I have visited the site and noted that there are some residential properties relatively close to the proposed scheme.
- 7.7. Given the arrangement of the residential scheme and the distances between the proposed dwellings and the existing residential properties, mindful that there are substantial existing mature trees and hedgerows along the boundary between the properties and the residential scheme, and mindful of the proposed additional planting, any effect on the outlook for the

elevations of these properties and their garden spaces would not breach the public interest test here. To the contrary, the proposed relationship to new development, evidenced by the illustrative masterplan, seems to me to be well thought out and appropriate.

Officer's Report (OR)

- 7.8. The Officer's Report specifically addresses residential visual amenity and notes the following observations:

"Whilst the details of the layout of the proposed dwellings are reserved for a later date, the relationship with a number of nearby residential dwellings must be considered in respect of the potential for the proposal to result in undue impact upon existing or future residential amenities.

In this respect, the nearest residential properties are Wildmans Farm, Wildman Barn, 1 and 2 Wildmans Barn located approximately 23– 36m from the closest part of the site, Wade Platt Farm is located 140m, Foxghyl, Redwoods and Redwoods Barn are located between 300 – 380m all to the west of the site. Properties on Bushburn Drive and Moorland Road are located on the southern boundary of the site with the railway line adjacent to the boundary providing a separation distance of around 20m. Northcote Park development is located immediately adjacent to the eastern boundary of the site. To the north of the site is Longsight Road (A59) with properties on this side located some distance away.

In respect of the existing properties to the south of the site, taking into account that the land levels slope downwards from south to north, these properties would have uninterrupted views of the proposed site from their rear (south) aspects. The majority of these properties are two storey or have rear dormers which overlook the site and therefore careful consideration of the proposed house types and proximity of these to the railway line boundary would need to be considered at the Reserved Matters stage to avoid the existing residential units experiencing significant direct overlooking from elevated positions that would significantly compromise and undermine the sense of privacy afforded to the private garden areas.

The existing properties to the east of the site on Northcote Park would be separated to some degree by the brook and existing woodland trees. With the proposed site plan indicating no built form within close proximity to the eastern boundary. As such those properties are not considered to be unduly affected.

The existing properties to the west consist of detached farm properties the nearest of which is Wildman's Farm and Barn which is located within its own grounds which abut the site to the east and south and therefore offer some protection in terms of impacts. Foxghyl and Redwoods are separated from the site by Whitehalgh Lane and therefore would not be unduly impacted by the development in term of amenity."

Summary

- 7.9. The Case Officer considered that the proposed development could be accommodated on the site without undue impacts on the existing neighbours' properties subject to appropriate house types, appropriate land levels and scale, appropriate design, and distances to the eastern and southern boundaries and to the individual residential units to the west. I have



undertaken a site visit and looked at the properties adjacent to the site and reviewed these in the context of the proposed scheme and consider that the proposed scheme would not breach the public interest test with regard to this scheme and is common ground with the Case Officer's report.

8. Comment on Reason for Refusal No 3

Introduction

- 8.1. This section of my statement addresses the second Reason for Refusal where the Council allege that the development would result in significant deterioration on the recreational value of the site. I interpret that as relating specifically to recreation enjoyed by members of the public, and as such, members of the public having access to the landscape that forms the site itself. I therefore proceed to consider how the proposal would have a bearing upon the public access route across the site and its associated amenity which primarily relates to visual senses and therefore, visual amenity (recognising 'hearing' sound is an experience too).

Public Footpath Across the Site (FP0606)

- 8.2. The indicative layout plan shows that is proposed to retain the footpath largely along its present alignment, referenced 606. A minor diversion towards the northern section. This diversion would require a legal order and a suitable diversion route to be divided around the balancing pond areas. I note that the layout is a reserved matter such that the indicative layout may change. The majority of the current alignment of this route would be retained and accommodated by the proposed design of the neighbourhood and green infrastructure.
- 8.3. The footpath is used by the local community. Use of this route provides open views across the site. With the proposed scheme in place, this route would pass along a narrow landscape corridor through part of the residential scheme whilst the southern section of the path would pass through naturalistic parkland landscape. Clearly the viewing context would change. The current viewing context reveals an open field with a backdrop of existing houses both to the east and south of the site. With the scheme in place, there would be views of the housing across the site. A high-quality design with regard to the residential neighbourhood and green infrastructure would ensure that the landscape would be attractive and the housing sympathetic in design terms reflective of the local area. With a high susceptibility, medium value, high sensitivity, and a medium magnitude of change there would be a major adverse visual effect with regard to users of this route through the site.
- 8.4. I would note the following with regard to useability of the PRow; the footpath currently cuts across grassland and therefore during the winter months, is muddy and difficult to cross, particularly for some members of the community, such as those that may require a better surface. The intention is that a bound gravel surface would be constructed 2m in width across the public open space and a sealed tarmac surface through the residential area which would ensure consistent useability throughout the seasons of the year, thereby increasing its useability.
- 8.5. Currently, the only formal legal public access to the site is along the PRow with any other use of the land regarded as tolerated trespass. If the land were grazed and required fencing, the landowner could run a fence line on the higher the side of the path to keep stock in and the public out on the rest of the land without any requirement for planning.
- 8.6. The proposal provides extensive open space which would allow unrestricted public access to all of the green space within the site area which would be a substantial benefit in terms of recreation space and opportunity within the site itself.
- 8.7. As part of the proposal, it is intended that the scheme would facilitate a Footpath Improvement Strategy Plan. There is one footpath across the site. There are a number of measures that could be introduced as part of the proposals that could be delivered through a suitably worded condition. These measures would include the following:

- Repair of existing gates and stiles.
- Signposting at each junction of routes.
- Interpretation boards at specific key locations.
- new security barriers could be introduced to discourage anti-social behaviours such as motorcycling.
- the area is popular for dog walking and so waste bins could be located at specific points.
- local circular routes could be promoted with coloured way markings to encourage use and navigation through the local landscape both within the site and immediate surroundings.
- seats and benches provided at key locations to offer rest points where views are available.
- public art installations engaging local artists and reflecting local landscape history associated with the coal mining heritage.
- management of vegetation to ensure good access year-round.
- appropriate ground surface reinforcement around nodes to compensate for heavy footfall to ensure year-round accessibility.
- replacement of stiles with gates.
- the surfacing of the north-south existing route.

Public Vantage Points on Longsight Road (A59)

- 8.8. Forming the northern boundary of the site is Longsight Road. From this major highway, the A59, there would be views of the proposed scheme where the road is adjacent to the site which forms a short section of this highway and runs north-eastward to Skipton to Preston in the south-west and accommodates a high volume of traffic, such that it is unattractive to walk along the roadside pavement on the north side of this highway given the speed and volume of traffic on this road. I apprehend that the use of this pavement is likely to be utilitarian and not recreational. Immediately east of the site in the vicinity of Green Nook wood the proposed scheme would fall from view and not be visible due to the presence of this woodland and adjacent residential area to the east of the site.
- 8.9. Once the proposed landscaping matures, views of the proposed development will be heavily filtered, and the change limited. Road users travelling along the Longsight Road generally travel at speed given it is part of the A59 road network. The existing hedgerows channel views along this road to some degree. Proposed tree belt planting along the northern boundary of the site would channel views along the alignment of the highway like other stretches of this road and as such there would be little perception of the proposed scheme once the landscape mitigation matures except for fleeting views at the vehicular access point, not dissimilar to the Northcote Park residential scheme to the east of the site.

Residential Properties on the North Side of Langho Village

- 8.10. The Case Officer considered that the proposed development could be accommodated on the site without undue impacts on the existing neighbours' properties subject to appropriate house types, appropriate land levels and scale, appropriate design, and distances to the eastern and southern boundaries and to the individual residential units to the west. I have undertaken a detailed site visit and looked at the properties adjacent to the site and reviewed these in the context of the proposed scheme and consider that the proposed scheme would not breach the above public interest test with regard to this scheme and is common ground with the Case Officer's report.

Landscape Character of the Area

- 8.11. Collectively, if one draws the different elements of the site together, it defines the overall character of the site itself. In summary, the site is characterised by field boundaries but is significantly influenced visually by the adjacent dwellings and Longsight Road. The site is framed to the south and east by residential areas and by the busy highway, Longsight Road, to the north and is currently significantly affected by the substantial urbanising influences of other adjacent development. I also note that this includes the adjacent railway line which accommodates both passenger and freight rail. The site, in terms of its character, appears as an urban fringe edge of Langho settlement environment.
- 8.12. The scheme would introduce a high-quality residential built environment which would be in keeping with the local settlement and character area and therefore, is not at odds or out of character or appearance. However, adopting a precautionary approach the proposals would result in an overall adverse effect in landscape character terms. The proposal would accommodate significant new green infrastructure alongside a new residential neighbourhood and therefore would result in some landscape beneficial effects.
- 8.13. The boundaries of the site are on the whole, framed by a combination of built form and mature vegetation, which provide a sense of visual containment and enclosure associated with the site.
- 8.14. The existing residential curtilages are close to the site's southern boundary which creates a strong sense of physical and visual connection between the current settlement edge and the adjacent parts of the site. The settlement boundary is currently defined by an ad-hoc arrangement of vegetation and fencing along the site boundary and railway line and as such this forms a harsh urban edge. The proposals would provide a much more robust landscape framework to a new northern settlement boundary.
- 8.15. At the site level, with a low susceptibility (given its urban fringe character), value and sensitivity combined with a high magnitude of change would result in an overall moderate (adverse) effect in landscape character terms.
- 8.16. As far as landscape character is concerned, I acknowledge that the site would see some considerable change from several pastoral fields. However, the baseline that needs to be taken into account here is that the proposed scheme is framed by housing, a rail line and roads. No significant off-site works are proposed and as such the character of the local landscape beyond the site in both physical and experiential terms would remain materially unchanged with the scheme in place.

- 8.17. I recognise that the scheme would bring about an inevitable change to the character of the application site itself, however, such a change would, in physical terms, be confined within the application site boundaries. Off site, the pattern of the land cover, tree and hedge cover and agricultural mix, undulating topography, the variety of building materials, Langho's settlement pattern as identified in the various published reports, would all continue and prevail with the scheme in place. Consequently, it is considered that those key characteristics of the wider landscape and settlement beyond the application site boundary as identified above would be physically unaffected with the scheme in place. It is only the experiential factors of character, both visual and audible elements that would be influenced to some limited degree locally. Any noise associated with the habitation and use of this scheme would be negligible in the wider landscape and settlement context particularly given the nearby roads. The scheme would not change the broad character of the wider area as the 'settled agricultural scene', which would continue to prevail with the scheme in place. The sensitive design of the proposed scheme would reflect the local settlement character of Langho. Any such effects would be highly localised, therefore.
- 8.18. I proceed to consider the character of the landscape at the site level i.e. with regard to the site itself. The site is currently pastoral land. The boundary of the site is in the main, framed by a combination of mature hedgerows and standard trees, which provides a strong sense of visual containment and enclosure associated with the site. There are significant urbanising influences associated with the site including housing. There are a number of residential areas which are close to the site's southern and eastern boundaries which reveals a strong sense of physical and visual connection between the settlement of Langho and the adjacent areas of the site. The site does accommodate some features such as trees and hedgerows, which contribute to the defining characteristics of the locality, but all of these elements would be retained, and their presence reinforced with the green of structure proposals as an integral part of the scheme.

Summary

- 8.19. For the reasons stated above it is my view that on landscape and visual grounds there are no substantive reasons for refusing planning permission for the proposed residential scheme on land adjacent to Longsight Road. Therefore, the Inspector is respectfully requested to uphold the scheme and allow the grant of planning permission as far as landscape and visual issues are concerned as it relates to the appeal scheme.

9. Summary and Conclusions

Introduction

- 9.1. I am instructed on behalf of Hallam Land Management Ltd, thereafter referred to as the appellant, to present evidence relating to Landscape and Visual matters in respect of the appeal, submitted pursuant to Section 78 of the Town and Country Planning Act 1990, concerning development of Land off Longsight Road, Langho ("the appeal site"). This evidence should be read in conjunction with the planning statement prepared by Mark Saunders and other statements prepared by the appellant.
- 9.2. In light of the third reason for refusal, this statement addresses specific points raised as follows:
- Views from Longsight Road.
 - Views from public footpath which crosses the site.
 - Views from residential properties on the north side of Langho village.
 - Effect on visual amenity.
 - Effect on landscape character.

Description of the Proposals

- 9.3. The proposed development is for 300 dwellings together with green infrastructure forming an integral element of the overall scheme. The intention is to create a new residential neighbourhood set within a high-quality green infrastructure framework. The north-eastern corner of the site is characterised by a small woodland known as Green Nook which would be retained. The scheme would include a small parkland in the south-eastern corner of the site which would be punctuated with a number of existing trees that would be retained and augmented with additional standard tree planting. The area would also accommodate a small car park area for the adjacent railway station. Much of the southern boundary of the site would be framed by a landscape corridor, again punctuated with tree cover. Internally within the site running through its centre would be a north-south orientated landscape corridor which would accommodate existing tree cover complemented with additional tree planting.
- 9.4. The western most part of the site adjacent to Whitehalgh Lane which would form a parkland setting between this lane and the proposed residential area. A second north-south orientated landscape corridor would weave through a residential area and accommodate a line of mature trees. The northern part of the site adjacent to Longsight Road would accommodate tree belts adjacent to the highway and areas of open grassland which would be seasonally wet forming surface water attenuation areas during the winter months.
- 9.5. Subsequent to the scheme being determined, the appellant has made some minor modifications to the green infrastructure proposed as follows:
- The existing public footpath that runs through the site would pass through a proposed residential area. The configuration of the hard landscaping of this area, including access road and driveways, has been adjusted to create a landscape corridor to accommodate the existing footpath alignment.
 - The northern boundary of the site would accommodate a tree belt running along its northern boundaries to provide a greater degree of physical and visual containment leaving the balancing pond areas in broadly the same locations.

Effect on Landscape Elements

- 9.6. In overall terms, the scheme would result in some beneficial effects with regard to the landscape elements that currently define the landscape character of the site. The site would change from pastoral fields to a high-quality design residential neighbourhood set within an attractive substantial landscape framework. The elements that currently contribute to defining the character of the site, namely trees, shrubbery and hedgerows would all be strengthened and form more prominent elements in the medium and longer term, but I recognise this would be in the context of a new residential neighbourhood.

Effect on Landscape Character

- 9.7. Collectively, if one draws the different elements of the site together, it defines the overall character of the site itself. In summary, the site is characterised by field boundaries but is significantly influenced visually by the adjacent dwellings and Longsight Road. The site is framed to the south and east by residential areas and by the busy highway, Longsight Road, to the north and is currently significantly affected by the substantial urbanising influences of other adjacent development. I also note that this includes the adjacent railway line which accommodates both passenger and freight rail. The site, in terms of its character, appears as an urban fringe edge of Langho settlement environment.
- 9.8. The scheme would introduce a high-quality residential built environment which would be in keeping with the local settlement and character area and therefore, is not at odds or out of character or appearance. However, adopting a precautionary approach the proposals would result in an overall adverse effect in landscape character terms. The proposal would accommodate significant new green infrastructure which would replace several pastoral fields and again change this character of the site to be more representative of the local landscape character area and therefore would result in some beneficial effects at the site level.
- 9.9. The boundaries of the site are on the whole, framed by a combination of built form and mature vegetation, which provide a sense of visual containment and enclosure associated with the site.
- 9.10. The existing residential curtilages are close to the site's southern boundary which creates a strong sense of physical and visual connection between the current settlement edge and the adjacent parts of the site. The settlement boundary is currently defined by an ad-hoc arrangement of vegetation and fencing along the site boundary and railway line and as such this forms a harsh urban edge. The proposals would provide a much more robust landscape framework to a new northern settlement boundary.
- 9.11. At the site level, with a low susceptibility (given its urban fringe character), value and sensitivity combined with a high magnitude of change would result in an overall moderate (adverse) effect in landscape character terms.
- 9.12. As far as landscape character is concerned, I acknowledge that the site would see some considerable change from several pastoral fields. However, the baseline that needs to be taken into account here is that the proposed scheme is framed by housing, a rail line and roads. No significant off-site works are proposed and as such the character of the local landscape beyond the site in both physical and experiential terms would remain materially unchanged with the scheme in place.

- 9.13. I recognise that the scheme would bring about an inevitable change to the character of the application site itself, however, such a change would, in physical terms, be confined within the application site boundaries. Off site, the pattern of the land cover, tree and hedge cover and agricultural mix, undulating topography, the variety of building materials, Langho's settlement pattern as identified in the various published reports, would all continue and prevail with the scheme in place. Consequently, it is considered that those key characteristics of the wider landscape and settlement beyond the application site boundary as identified above would be physically unaffected with the scheme in place. It is only the experiential factors of character, both visual and audible elements that would be influenced to some limited degree locally. Any noise associated with the habitation and use of this scheme would be negligible in the wider landscape and settlement context particularly given the nearby roads. The scheme would not change the broad character of the wider area as the 'settled agricultural scene', which would continue to prevail with the scheme in place. The sensitive design of the proposed scheme would reflect the local settlement character of Langho. Any such effects would be highly localised, therefore.
- 9.14. I proceed to consider the character of the landscape at the site level i.e. with regard to the site itself. The site is currently pastoral land. The boundary of the site is in the main, framed by a combination of mature hedgerows and standard trees, which provides a strong sense of visual containment and enclosure associated with the site. There are significant urbanising influences associated with the site including housing. There are a number of residential areas which are close to the site's southern and eastern boundaries which reveals a strong sense of physical and visual connection between the settlement of Langho and the adjacent areas of the site. The site does accommodate some features such as trees and hedgerows, which contribute to the defining characteristics of the locality, but all of these elements would be retained, and their presence reinforced with the green of structure proposals as an integral part of the scheme.

Effect on General Visual Amenity

- 9.15. It is evident from the LVIA and the visual analysis I have undertaken for this statement that the proposed development would be visually well contained due to surrounding woodland, tree cover and the settlement of Langho. The proposed development would be set within a series of existing fields within a wider field pattern where field boundaries are demarcated by established hedges and tree cover. Substantial tree cover frames much of the site. Based on the Viewpoint Assessment, it is evident that the proposed scheme would be largely well contained as a result of topographical variation in the local landscape, vegetation screening including hedgerows, woodland and tree cover, roadside vegetation, as well as existing residential areas. The majority of the visual receptors would be generally close to the site and its perimeters. More distant views across the landscape would see the proposed scheme in a wider valley context associated with Langho village and viewed as a minor addition to the settlement. The majority of the identified and assessed viewpoints and receptors would not be subject to a major degree of visual effect. Indeed, the majority of the visual effects would be negligible to minor in terms of scale of effect.
- 9.16. It is anticipated the tree belts to frame the screen would establish and grow as would the green infrastructure generally which would increase the degree of visual containment of the scheme from the surrounding countryside and settlement in the medium and longer term.

Effect on Residential Visual Amenity

- 9.17. The Case Officer considered that the proposed development could be accommodated on the site without undue impacts on the existing neighbours' properties subject to appropriate house types, appropriate land levels and scale, appropriate design, and distances to the eastern and southern boundaries and to the individual residential units to the west. I have undertaken a site visit and looked at the properties adjacent to the site and reviewed these in the context of the proposed scheme and consider that the proposed scheme would not breach the public interest test with regard to this scheme and is common ground with the Case Officer's report.

Comment on Reason for Refusal No 3

Views from Longsight Road

- 9.18. Forming the northern boundary of the site is Longsight Road. From this major highway, the A59, there would be views of the proposed scheme where the road is adjacent to the site which forms a short section of this highway and runs north-eastward to Skipton to Preston in the south-west and accommodates a high volume of traffic, such that it is quite challenging to walk along the roadside pavement on the north side of this highway given the speed and volume of traffic on this road. Immediately east of the site in the vicinity of Green Nook wood the proposed scheme would fall from view and not be visible due to the presence of this woodland and adjacent residential area to the east of the site.
- 9.19. Similarly, west of the site, the proposed scheme would not be visible from this highway due to the presence of a complex of buildings and tree cover and vegetation adjacent to the south side of this highway. Initially there would be open views from the A59 where it runs alongside the site as it is currently flanked by a low continuous hedgerow. However, it is proposed that a tree belt would be planted along the northern boundary except for the vehicular access point into the site and the existing public footpath. With the establishment and maturity of the tree belt, the proposed scheme would not be visible from this highway except fleetingly through these 2 access points. I regard the roadside pavement as a road user category given the focus is to walk along this footway in the context of a busy highway.

Views from public footpath which crosses the site

- 9.20. The indicative layout plan shows that it is proposed to retain the footpath, referenced 606, across the site, albeit with a diversion towards the northern section. This diversion would require a legal order and a suitable diversion route to be divided around the balancing pond areas. I note that the layout is a reserved matter such that the indicative layout may change. The majority of the current alignment of this route would be retained and accommodated by the proposed design of the neighbourhood and green infrastructure.
- 9.21. The footpath is used by the local community. Use of this route provides open views across the site. With the proposed scheme in place, this route would pass along a narrow landscape corridor through part of the residential scheme whilst the southern section of the path would pass through naturalistic parkland landscape. Clearly the viewing context would change. The current viewing context reveals an open field with a backdrop of existing houses both to the east and south of the site. With the scheme in place, there would be views of the housing across the site. A high-quality design with regard to the residential neighbourhood and green infrastructure would ensure that the landscape would be attractive and the housing sympathetic in design terms reflective of the local area. With a high susceptibility, medium

value, high sensitivity, and a medium magnitude of change there would be a major adverse visual effect with regard to users of this route through the site.

Views from residential properties on the north side of Langho village

- 9.22. The Case Officer considered that the proposed development could be accommodated on the site without undue impacts on the existing neighbours' properties subject to appropriate house types, appropriate land levels and scale, appropriate design, and distances to the eastern and southern boundaries and to the individual residential units to the west. I have undertaken a site visit and looked at the properties adjacent to the site and reviewed these in the context of the proposed scheme and consider that the proposed scheme would not breach the public interest test with regard to this scheme and is common ground with the Case Officer's report.

Effect on visual amenity

- 9.23. It is evident from the LVIA and the visual analysis I have undertaken for this statement that the proposed development would be visually well contained due to surrounding woodland, tree cover and the settlement of Langho. The proposed development would be set within a series of existing fields within a wider field pattern where field boundaries are demarcated by established hedges and tree cover. Substantial tree cover frames much of the site. Based on the Viewpoint Assessment, it is evident that the proposed scheme would be largely well contained as a result of topographical variation in the local landscape, vegetation screening including hedgerows, woodland and tree cover, roadside vegetation, as well as existing residential areas. The majority of the visual receptors would be generally close to the site and its perimeters. More distant views across the landscape would see the proposed scheme in a wider valley context associated with Langho village and viewed as a minor addition to the settlement. The majority of the identified and assessed viewpoints and receptors would not be subject to a major degree of visual effect. Indeed, the majority of the visual effects would be negligible to minor in terms of scale of effect.
- 9.24. It is anticipated the tree belts to frame the screen would establish and grow as would the green infrastructure generally which would increase the degree of visual containment of the scheme from the surrounding countryside and settlement in the medium and longer term.

Effect on landscape character

- 9.25. At the site level, with a low susceptibility (given its urban fringe character), value and sensitivity combined with a high magnitude of change would result in an overall moderate (adverse) effect in landscape character terms.
- 9.26. As far as landscape character is concerned, I acknowledge that the site would see some considerable change from several pastoral fields. However, the baseline that needs to be taken into account here is that the proposed scheme is framed by housing, a rail line and roads. No significant off-site works are proposed and as such the character of the local landscape beyond the site in both physical and experiential terms would remain materially unchanged with the scheme in place.
- 9.27. I recognise that the scheme would bring about an inevitable change to the character of the application site itself, however, such a change would, in physical terms, be confined within the application site boundaries. Off site, the pattern of the land cover, tree and hedge cover and agricultural mix, undulating topography, the variety of building materials, Langho's

settlement pattern as identified in the various published reports, would all continue and prevail with the scheme in place. Consequently, it is considered that those key characteristics of the wider landscape and settlement beyond the application site boundary as identified above would be physically unaffected with the scheme in place. It is only the experiential factors of character, both visual and audible elements that would be influenced to some limited degree locally. Any noise associated with the habitation and use of this scheme would be negligible in the wider landscape and settlement context particularly given the nearby roads. The scheme would not change the broad character of the wider area as the 'settled agricultural scene', which would continue to prevail with the scheme in place. The sensitive design of the proposed scheme would reflect the local settlement character of Langho. Any such effects would be highly localised, therefore.

- 9.28. I proceed to consider the character of the landscape at the site level i.e. with regard to the site itself. The site is currently pastoral land. The boundary of the site is in the main, framed by a combination of mature hedgerows and standard trees, which provides a strong sense of visual containment and enclosure associated with the site. There are significant urbanising influences associated with the site including housing. There are a number of residential areas which are close to the site's southern and eastern boundaries which reveals a strong sense of physical and visual connection between the settlement of Langho and the adjacent areas of the site. The site does accommodate some features such as trees and hedgerows, which contribute to the defining characteristics of the locality, but all of these elements would be retained, and their presence reinforced with the green of structure proposals as an integral part of the scheme.

Conclusion

- 9.29. For the reasons stated above it is my view that on landscape and visual grounds there are no substantive reasons for refusing planning permission for the proposed residential scheme on land adjacent to Longsight Road. Therefore, the Inspector is respectfully requested to uphold the scheme and allow the grant of planning permission as far as landscape and visual issues are concerned as it relates to the appeal scheme.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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APPENDIX 4:

ECOLOGICAL APPEAL STATEMENT

FPCR | environment
& design



Ecological Appeal Statement

LPA REF: 3/2025/0196

Client

Hallam Land

Project

**Land South of Longsight Road,
Langho**

Date

December 2025

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FIGURES

Figure 1: Baseline Habitat Plan

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DECLARATION

"The evidence which I have prepared and provide for this appeal is true and has been prepared and is given in accordance with guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions".

Rev	Issue Status	Prepared/Date	Approved/Date
-			KG /04.12.25

1.0 INTRODUCTION

- 1.1 I am Mr Kurt David Goodman, and I am Senior Director of Ecology at FPCR Environment & Design Ltd. (FPCR). The Hallam Land (the 'Appellant') has instructed me to produce an ecological appeal statement to inform the overarching Statement of Case (SoC). If the Inspector requires further ecological evidence to assist the appeal, this statement will be updated in accordance with any timetable set by the Inspector.
- 1.2 I hold an Honours Degree in Environmental Biology from the University of Sunderland and an MSc in Environmental Management for Conservation and Recreation from Sheffield Hallam University. I am a Member of the Chartered Institute of Ecology and Environmental Management. I have over 27 years of experience advising on complex developments. I am routinely involved in site selection, constraints analysis, mitigation to avoid and minimise environmental impacts, detailed design involving habitats and protected species for complex multi-phased schemes, and dealing with biodiversity net gain (BNG) for the purpose of development and the creation of biodiversity banks with private providers to supply BNG credits to developers where necessary. I also hold Natural England survey licenses for bats and great crested newts, and have held these for over 20 years.
- 1.3 I have provided evidence to numerous planning appeals on matters relating to ecology and nature conservation. These have included matters relating to general ecological issues associated with habitats and protected species, matters associated with Biodiversity Net Gain (BNG), and specific matters related to designated sites and qualifying habitats.
- 1.4 FPCR has been involved with the proposals prior to submission of this planning application and the design of the proposals, including the mitigation / compensation required to avoid or minimise potential effects to ecology and nature conservation.
- 1.5 The evidence which I have prepared and provided for this appeal is true and has been prepared and is given in accordance with the guidance of my professional institution, the CIEEM, and I confirm that the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.

2.0 BACKGROUND TO THE APPEAL

- 2.1 The outline planning application for the Site was registered by the Local Planning Authority (LPA), Ribble Valley Borough Council, on 20 March 2025 (Planning Reference Number: 3/2025/0196). This application was for a residential development of up to 300 dwellings and associated infrastructure, a railway station car park, green infrastructure (GI) and a sustainable drainage system.
- 2.2 The application was submitted with the Ecological Impact Assessment (EclA) (February 2025) and a Biodiversity Net Gain Strategy (February 2025). The submitted EclA detailed the results of the 1 Habitat Survey and relevant protected species surveys completed at the point of submission.
- 2.3 The council's ecological advisor provided a single consultation response in June 2025. This consultation response noted that further ecological survey information and the results of the planned survey work were required to assist the decision-making process. In respect of biodiversity net gain, the council's ecological advisor queried whether a number of the

predicted post-development condition assessments could be achieved and requested further clarification for the location of where off-site biodiversity units could be sourced (if required).

- 2.4 Following submission of the planning application and, as outlined in the original ecological submission over the period of April – July 2025, additional ecological information was obtained. The survey information related to GCN, breeding birds, bats and a detailed botanical assessment. This additional information is the survey data that the council requested in their consultation response dated June 2025.
- 2.5 Updated documents comprising an EcIA and Biodiversity Net Gain Assessment, both dated November 2025, have been produced and submitted to the Local Authority (LA). The updated EcIA includes the results of the additional survey work completed over April – July 2025. The corresponding Biodiversity Net Gain Assessment was updated to reflect the findings of the detailed botanical assessment. These documents address the comments raised by the LA in June 2025.
- 2.6 The planning application was refused on 27 June 2025, without waiting for the additional, requested ecological information to be produced, citing two ecological Reasons for Refusal (RfR). The RfR's state:
- 2.7 RfR4:
- 'The application fails to carry out appropriate assessments to fully assess the impacts of the development upon habitat within and adjacent to the site including whether appropriate protection and enhancement can be provided for protected species and their habitat. This is contrary to the Key Statement EN4 and Policy DME3 of the Ribble Valley Core Strategy and the National Planning Policy Framework.'*
- 2.8 RfR5:
- 'The proposed development would result in the loss of existing habitat, hedgerow and watercourse units, with insufficient details being submitted to demonstrate an appropriate strategy for achieving the statutory requirement for Biodiversity Net Gain contrary to Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).'*

3.0 CONSULTATION RESPONSES AND OFFICERS' REPORT TO COMMITTEE

- 3.1 Natural England did not object to the proposals, rather the council was referred to their standing advice and the 'Impact Risk Zones' published on MAGIC.
- 3.2 As outlined in Section 2.0, a single consultation response was received from the council's ecological advisor on 09 June 2025, provided to the applicant on 19 June 2025 shortly before the refusal of the application on 27 June 2025.
- 3.3 Whilst requesting additional ecological survey information from 'the planned surveys' and raising some queries regarding the biodiversity net gain submission, the response raised no significant ecological concerns which could not have been resolved through the submission of additional information.

Officer's Report to Committee

- 3.4 Paragraphs 5.5.5 – 5.5.9 of the committee report considered matters relating to Ecology & Nature Conservation. The assessment outlines matters raised by the council's ecological advisor in June 2025, concluding that without the additional survey information and

information relating to Biodiversity Net Gain, the planning application failed to accord with the Key Statement of EN4. Policy DME3 and the requirements of the Biodiversity Net Gain condition. I remain baffled why the application was refused rather than additional information requested.

4.0 SCOPE OF EVIDENCE & STRUCTURE

- 4.1 This Ecological Appeal Statement refers to the relevant baseline ecological information recorded during site surveys undertaken by FPCR, the potential effects of the proposals, the mitigation and appropriate enhancements proposed by the development, including BNG, and the provision of off-site compensation.
- 4.2 My evidence summarises the results of the updated EclA and Biodiversity Net Gain Assessment, dated November 2025, and submitted to the Local Authority. These submissions provide the additional information which I understand the council ecological officer requested in their consultation in June 2025.
- 4.3 To assist the Inspector, my evidence also provides clarification on matters relating to the biodiversity net gain and the statutory net gain objective. Whilst further details relating to landscape design will be submitted for areas within the Site at the detailed design stage, the submissions to this appeal provides clarity of the long-term intentions for on-site mitigation and the management of these habitats. The areas of significant habitat enhancements provided on-site will be captured in the draft legal agreement for the development. Further information is also provided on the registered strategic-level habitat bank that the appellant intends to use as part of the overall mitigation package for the proposals.
- 4.4 From a plain reading of the consultation responses and the officer report to committee matters relating to statutory and non-statutory designated sites are not disputed between the main parties.
- 4.5 Ecological matters disputed by the council and from plain reading of the RfR, the LA case relies on two simple themes:
- 1 - insufficient ecological survey information was submitted with the application to satisfy the council's duty under the Habitat Regulations.
 - 2 - inadequate information has been submitted to demonstrate that the biodiversity net gain objective can be achieved or that the biodiversity net gain condition could be discharged.
- 4.6 Notwithstanding the disputed matters, overall, I consider that with the application of appropriate mitigation and compensation, the Site has the capacity for development, which with the application of mitigation and compensation, would not result in more than low-level harm, which would in any event be appropriately mitigated. I conclude that there are no reasons relating to matters of ecology, biodiversity and the relevant regulatory framework, which would prevent the appeal from being allowed.
- 4.7 The Ecological Appeal Statement is presented in the following Sections:
- Section 5: Legislation, Relevant Planning Policy & Guidance;
 - Section 6: Background to Biodiversity Net Gain;
 - Section 7: Ecological Baseline;

- Section 8: Inherent Mitigation, Design and Evolution;
- Section 9: Assessment of Potential Effects, Mitigation & Biodiversity Net Gain;
- Section 10: Compliance with Guidance & Policy and Assessment of the Reason for Refusal (RfR);
- Section 11: Summary & Conclusions.

5.0 RELEVANT LEGISLATION, PLANNING POLICY & GUIDANCE

5.1 Legislation, planning policy, and guidance relevant to this statement are listed below:

- The Conservation of Habitat & Species Regulations 2017 (*as amended*);
- The Wildlife and Countryside Act 1981 (*as amended*);
- Natural Environment and Rural Communities Act 2006;
- The Environment Act 2021;
- The National Planning Policy Framework (NPPF, December 2024);
- National Planning Practice Guidance (NPPG);
- British Standards Institution (2013) 'Biodiversity – Code of practice for planning and development', BS 42020:2019;
- The Statutory Biodiversity Metric. User Guide. (First published February 2024. Last Updated 3 July 2025);
- Planning Practice Guidance (PPG). Biodiversity Net Gain;
- Ribble Valley Core Strategy 2008 – 2023 (Adopted 2014) (Specific Policies: EN4, DME1 and DME3).

6.0 BACKGROUND TO BIODIVERSITY NET GAIN

- 6.1 Paragraphs 187 (d) & 193 (d) of the NPPF recommend that development proposals should provide measurable net gain to biodiversity in and around development, but do not suggest a minimum level of net gain that developments should provide. On plain reading, whilst 193(d) indicates measurable net gains should be demonstrated, this recommendation is on the premise that where such gains are demonstrated, this is viewed as a positive element of the application.
- 6.2 Biodiversity net gain is the positive elements of development proposals, or simply put, the elements of proposals which demonstrate betterment or a position exceeding no net loss. Biodiversity offsetting is the last step on the mitigation hierarchy, providing compensation for losses which cannot be mitigated within the site. In situations where 'offsetting' is only being used to provide betterment above a 'no net loss' situation, this is not strictly compensation in terms of the mitigation hierarchy unless it is resolving residual effects of development proposals.
- 6.3 Since the enactment of the Environment Act on 12th February 2024, there has been a legal requirement for most development projects to provide a minimum level of 10% net biodiversity gain, as measured using the Defra statutory metric. The planning application was submitted

following 12th February 2024 and is therefore subject to the requirements of mandatory net gain as outlined in Schedule 7A of the Town & Country Planning Act 1990.

- 6.4 The Biodiversity Net Gain (BNG) PPG provides guidance to developers and Local Authorities (LA's) regarding the application of BNG. The following provides a summary of the key principles that I consider relevant to this appeal.
- 6.5 Paragraph 001 provides users with relevant information relating to the statutory framework for biodiversity net gain. This paragraph states:

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

The biodiversity gain condition is a pre-commencement condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development. There are exemptions and transitional arrangements which disapply the condition from certain planning permissions, as well as special modifications for planning permissions for phased development and the treatment of irreplaceable habitats.

The statutory framework for biodiversity net gain also includes provisions about information requirements for planning applications and the treatment of the condition on decision notices on the grant of planning permission.

The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021, and was amended by the Levelling Up and Regeneration Act 2023. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 made consequential amendments to other parts of the 1990 Act.

- 6.6 Paragraph 002 confirms the biodiversity gain plan must be submitted and approved prior to commencement of development, and the plan provides the details of how the biodiversity objective (achieving a 10% net gain) will be met. The plan is based on:
- The onsite post development habitat provision based on accurate and approved plans or drawings of the development* (emphasis added*).
 - Confirmation that any offsite gains have been registered and allocated* to the development (emphasis added*).

- Confirmation that any biodiversity credits have been purchased.
- 6.7 Whilst the guidance is clear that many of the requirements of biodiversity net gain cannot be established until the submission of a detailed application, the guidance confirms that net gain is not a post-permission matter, and consideration during the application is required. This is to ensure the local authority has adequate information to ensure the biodiversity gain objective can be met.
- 6.8 The main information the guidance requires applicants to submit relates to the baseline habitat value, but suggests local authorities may seek further information on the proposed approach to meeting the biodiversity gain objective.
- 6.9 Paragraph 008 provides a separate hierarchy for biodiversity net gain, which local authorities should consider. This requires:
- development should avoid adverse effects to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), but where such effects cannot be avoided, mitigation should be applied.
 - where adverse effects are identified, compensation should be provided in the order of enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains, and finally the purchase of biodiversity credits.
- 6.10 Paragraph 011 confirms what information must be submitted with the planning application. This includes;
- Confirmation that the applicant considers that the development would be subject to the biodiversity net gain condition,
 - The pre-development habitat value,
 - The date of the assessment, and reasoning for using an earlier date (if appropriate),
 - The completed metric calculation tool,
 - A statement whether there has been any de-valuing operations,
 - A description of any irreplaceable habitats,
 - Plans, showing the location and extent of existing habitats and any irreplaceable habitats.
- 6.11 The relevant date for the baseline survey information should be shortly before submission of the planning application to ensure an accuracy of the information (Paragraph 012). This guidance confirms that any changes since submission of the baseline should not be applied, and the relevant date for the Biodiversity Gain Plan should be the baseline conditions used in the submitted metric to support the determination of the planning permission.
- 6.12 The PPG confirms that local authorities may ask for additional information beyond that outlined at Paragraph 002 to assist consideration of the biodiversity net gain (Paragraph 013). Where additional information is requested, a proportionate approach is recommended, and specifically relating to this appeal, bullet points 2 and 3 apply. These state:

'it may be appropriate to require information on the proposed balance between onsite gains, off-site gains and biodiversity credits, for proposals involving significant onsite habitat enhancements, and potential requirements for S106 agreements;

in some cases, further details (such as landscaping) may only be approved as a subsequent matter (for example approval of conditions following the grant of planning permission) following the grant of planning permission and if offsite gains and credits are proposed to be used, evidence is going to be required in the Biodiversity Gain Plan therefore it may not be proportionate to request all this information at the planning application stage.'

- 6.13 Bullet point two links back to Paragraph 002, which identifies that full details drawings are required to allow accurate completion of the Biodiversity Gain Plan. This is relevant when assessing the merits of RfR5 and the outline status of the application.
- 6.14 Paragraph 015 identifies that in situations where either onsite or offsite habitats will provide significant biodiversity enhancement, a Draft Habitat Management & Monitoring Plan (HMMP) should be provided, but the full details of the plan will be secured through the planning condition. Where off-site provisions are required, the PPG recommends draft heads of terms setting the obligations required in the final S106 agreement be submitted.
- 6.15 The Statutory Metric was released on 12 February 2024. This is the version of the metric used to support mandatory biodiversity net gain and is the version of the metric submitted to support the appeal proposals.
- 6.16 The user guide published with the Statutory Biodiversity Metric provides relevant background information on the mechanisms of the background calculations of the metric and the rules of the metric. One of the fundamental points confirmed in the user guide is that the values produced by the metric are 'proxy' values, allowing comparison of levels of biodiversity pre and post-development. The 'proxy' values created by the metric do not indicate a level of ecological importance and therefore require the application of ecological knowledge and judgement.
- 6.17 The user guide confirms the metric works on eight principles and five rules (Tables 1 and 2). These principles and rules have been applied when designing the proposed mitigation and compensation associated with the appeal proposals.

Table 1: The Biodiversity Metric Principles (Source: The Statutory Biodiversity Metric User Guide)

Principle Number	Principle Detail
Principle 1	The metric assessment should be completed by a competent person.
Principle 2	The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.
Principle 3	This biodiversity metric should be used in accordance with established good practice guidance and professional codes.
Principle 4	This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
Principle 5	Biodiversity units are a proxy for biodiversity and should be treated as relative values.
Principle 6	This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
Principle 7	Habitat interventions need to be realistic and deliverable within a relevant project timeframe.

Principle Number	Principle Detail
Principle 8	Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.
Principle 9	This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to: - maintain habitat extent - supporting more, bigger, better and more joined up ecological networks - ensure that proposed or retained habitat parcels are of sufficient size for ecological function

Table 2: The Biodiversity Metric Rule (Source: The Statutory Biodiversity Metric User Guide)

Rule	Rule Detail
Rule 1	The trading rules of this biodiversity metric must be followed.
Rule 2	Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.
Rule 3	To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.
Rule 4	In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

- 6.18 Whilst providing biodiversity net gain within development sites is generally preferable to offsite solutions, the provision of biodiversity net gain offsite is not discounted, providing that the principles of the mitigation hierarchy outlined at Paragraphs 008 of the PGG and Paragraph 193(a) are followed (NPPF December 2024).
- 6.19 When considering the use of offsite provisions, it is noteworthy that the PPG does not require offsite solutions to be local to the point of impact or even within the same administrative region of as the impact. Whilst Principle 8 does consider the use of 'local' compensation sites is preferable, the User Guide confirms the embedded calculation of the metric does apply simple risk multipliers of 1.0, 0.75, and 0.5 for offsite compensation depending on the relative location of the receptor to the affected land.
- 6.20 Compensation within the LPA boundary attracts a multiplier of 1.0, compensation outside the LPA boundary but in an adjacent LPA attracts the 0.75 multiplier, and those outside of the LPA boundary or the adjacent boundary use 0.5. In simple terms, the application of these multipliers simply requires more habitat credit to be used the further the compensation or receptor site is from the point of impact.
- 6.21 The recent appeal decisions of Stonebow Road, Drakes Broughton (Appeal Ref: APP/H1840/W/24/3340903) (Paragraphs 53 - 54), Woodland Lane, Bedworth (Appeal Ref: APP/W3710/W/24/3345739) (Paragraphs 28 - 31) and 97 Hartshorne Road, Woodville (Appeal Reference: APP/F1040/W/25/3358723) (Paragraphs 34, 38 - 41) found the use of offsite receptors to secure biodiversity net gain is acceptable. It is noteworthy that the off-site receptor for the Drake Broughton appeal was providing compensation for the partial loss of an

orchard (a priority habitat as listed in S41 of the NERC Act), and the off-site receptors for the Woodland Lane & Hartshorne Road appeals were a strategic-level habitat bank. The conclusions of these appeal decisions are equally important when considering this appeal.

- 6.22 As outlined in Paragraph 002, where off-site solutions to support proposals are necessary, provisions can either be secured on alternative land owned and managed by the same applicant, or on land owned and managed by the Local Authority (LA), or on third-party land where there is a scheme that can provide the credits necessary to secure the measurable net gain.
- 6.23 Where alternative land owned and managed by the same applicant, or third-party land is used, this land effectively is considered to be 'a biodiversity gain site' and Part 6 100 (2)(a) of the Environment Act 2021 confirms there are two mechanisms of securing the habitat enhancements and long-term management of such sites. These mechanisms are either 'a conservation covenant' or 'a planning obligation'.

7.0 ECOLOGICAL BASELINE

- 7.1 The submitted and the updated Ecological Impact Assessments (EcIA), dated February 2025 and November 2025, provide details of all statutory and non-statutory designated sites on land within and surrounding the Appeal Site. This assessment concludes that the Site is not a statutory or non-statutory designated site of nature conservation importance, and development at the Site will not affect the conservation status of any of the designated sites identified in the relevant 'Zones of Influence' (Zoi) surrounding the appeal Site. This is a conclusion that I support and adopted for this appeal.
- 7.2 Over the determination period, the local authority has not raised any matters relating to potential effects of the proposals on statutory or non-statutory designated sites.

Flora

- 7.3 The EcIA dated February 2025 was submitted with the planning application. Table 5 of the assessment provides a review of the habitats present across the Site at the point of submission of the application.
- 7.4 An updated EcIA dated November 2025 has been produced and submitted to the LA. This updated assessment provides further details of the habitats present on the appeal site at Paragraphs 5.5 – 5.7 and Table 5. The locations of the habitats shown on Figure 1.
- 7.5 My evidence adopts the position as documented in the updated EcIA. Where not stated in the EcIA or previous submission, and where necessary, I provide additional consideration of the ecological importance of the ecological receptors within the Appeal Site.
- 7.6 The updated Biodiversity Net Gain Assessment, dated November 2025 includes further details of the updated botanical assessment completed in July 2025.
- 7.7 Since submission of the application, woodland W-1 has now been mapped on the updated 'Ancient Woodland Inventory (revised completed counties) layer' as Ancient Woodland (AW). At the point of application, this was not mapped as ancient woodland. The classification of ancient woodland is supported by the field survey showing, the ground flora comprises recognisable NVC communities, with a number of ancient woodland indicators, albeit at low frequencies. As a result, this habitat is considered to be an 'irreplaceable habitat' as defined by the NPPF and

the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. In addition, the Arboricultural assessment identified one veteran tree within W-1 and is classed as an irreplaceable habitat. No other irreplaceable habitats were identified.

- 7.8 The Site is approximately 20 ha in extent and supports mostly grassland habitats. Primarily other neutral grassland, with a central area of lowland meadow, priority grassland and a modified grassland field to the west. Two streams and a number of waterbodies were recorded on Site. In the north east corner is an area of Ancient Woodland, with two further areas, lesser in extent, occurring along the central stream and also on the western boundary.
- 7.9 The Site and habitats within the Site have not been the subject of positive conservation management under an agricultural stewardship scheme or other conservation scheme. The current management does not include annual hays cut but rather involves low level grazing at low stocking rates.

Grassland

Lowland Meadow

- 7.10 Community G11 was moderately species rich neutral grassland community recorded at the southern extent of the Site to the West of Watercourse R2. The community featured a diverse mixture of species, including a wide range of neutral grassland and lowland meadow indicators. However the majority of these were present at lower frequencies, which resulted in the average number of species per m² recorded during the detailed botanical surveys being lower than typical examples of the community.
- 7.11 The community is representative of NVC community MG5c the *Danthonia decumbens* sub-community. The *Danthonia* sub-community is the acid influenced sub-community of MG5, with its classification here based on the frequency and abundance of preferential species such as tormentil, eyebright, heath-grass, betony, devil's-bit scabious, field wood-rush and sneezewort, which occur together with a range of neutral grassland indicators, such as ribwort plantain, meadow buttercup, common sorrel and common bird's-foot-trefoil. The invasive species, Himalayan balsam was occasionally noted in association with the margins of the watercourse.
- 7.12 On the basis of the habitat meeting the pre-requisite habitat classification of MG5 and passing the lowland meadow criteria outlined in UKHab, the classification of g3a Lowland Meadow was made. NVC community MG5 is a constituent habitat of Lowland Meadows, a Habitat of Principal Importance under the NERC Act (2006). The community does not meet the selection criteria for qualification as a Biological Heritage Site (BHS) within Lancashire.
- 7.13 Overall, the community was assessed as being in Poor condition, principally due to failing essential criterion A of the medium, high and very high distinctiveness grassland condition assessment within the Statutory Metric Guidance. This condition assessment is representative of a grassland habitat which is not positively managed for nature conservation.
- 7.14 Although this component is a good fit for NVC community MG5c, assessment has shown it is not a good example of the type, lacking the overall species richness and cover of indicator species seen in the best examples. Here, no Lowland meadow indicators were recorded as frequent in the quadrats, with five at occasional. The community is managed by extensive low-density grazing and is considered to be undermanaged, in common with the wider eastern and central field, which is evident through the tall closed grassy swards and the lack of bare ground.

These limit herbaceous diversity and cover to the detriment to the conservation value of the community. The community also failed on the local presence of the invasive species Himalayan Balsam on the margins of the habitat next to R2.

- 7.15 The Lowland Meadow habitat recorded on Site is considered to be an important ecological feature albeit at a County scale.

Other Neutral Grassland

- 7.16 The dominant habitat within the Site comprised of other neutral grassland, specifically the UKHab level 5 community g3c6 Lolium -Cynosurus grassland. Within G1, G1a, G1b, G3, G7 and G8, these communities are moderately species rich example of g3c6. Again, none of these grassland areas of positively managed for nature conservation.
- 7.17 Whilst some Lowland Meadow indicator species were present, the diversity and frequency of indicator species was not sufficient to meet the qualifying criteria for Lowland Meadow priority habitat. Grassland parcels G1, G1a, G1b, G3, G7 and G8 have been identified as g3c6 habitat type and have been valued as an IEF at a Local scale.
- 7.18 G4 and G5 represent less species rich examples of g3c6 grassland and therefore were not considered to be an IEF.
- 7.19 Community G2, recorded centrally within the Northern section of the eastern field and comprised a taller wet grassland community. The community is representative of NVC community MG10 (equivalent of g3c8 Holcus Juncus Grassland in UKHab), moving towards M23b rush pasture, the soft rush sub-community (f2b rush pasture in UKHab). However, the community recorded is not species rich enough to classify as the priority habitat type. As the parcel represents the g3c8 habitat type, it is valued as an IEF at a Local scale.
- 7.20 G6 comprises a small unmanaged g3c5 *Arrhenatherum* grassland community recorded to the north-west of the Site. G9 recorded to the west of the Site featured a short sward with a species composition borderline between g4 modified grassland and g3c other neutral grassland, with a classification of g3c made on the basis of the overall species richness and the frequency of a number of neutral grassland indicators. Both G6 and G9 grassland parcels were representative of common and widespread grassland habitats and were not considered to be an Important Ecological Feature.
- 7.21 Given the geographical location of the Site, moderately species rich areas of grassland are a widespread resource. When assessed against the criteria for selection as a Biological Heritage Site (BHS) within Lancashire, none of these grassland compartments met the criteria to be selected.

Woodland

- 7.22 Three parcels of Lowland Mixed Deciduous Woodland were noted. Woodland W1, known locally as Green Nook Wood, was recorded to the north-east of the Site. As noted above, this woodland is now mapped under the 'Ancient Woodland Inventory (revised completed counties) layer' and is considered an irreplaceable habitat. Due to its recent reclassification as ancient woodland, W1 is considered to meet the selection criteria as a Biological Heritage Site (BHS) under either Criteria:
- WD1: Sites included on the Lancashire Inventory of Ancient Woodland which support semi-natural woodland vegetation; or

- WD2: Other semi-natural woodlands over 1 hectare where field evidence indicates that they are ancient in origin.
- 7.23 Pedunculate Oak was abundant amongst the canopy, with sycamore and beech (including a veteran) occasional associates. These canopy trees formed a high single-storey canopy, lacking any significant understorey with only hazel recorded at occasional or above. The ground flora would be broadly characterised as NVC community W11 *Quercus petraea* - *Betula pubescens* - *Oxalis acetosella* woodland with an abundance of common bent, frequent cock's foot and a limited number of herbaceous species such as wood speedwell, wood avens and broad buckler-fern recorded occasionally.
- 7.24 The woodland was open to grazing stock, with evidence of grazing pressure negatively impacting the woodland. Further north alder was more prominent within the canopy and tufted hair-grass and creeping buttercup become locally frequent along with marsh thistle and Reed canary-grass at lower frequencies, indicative of damper conditions. The banks of watercourse R1, which runs along the woodlands western edge, featured a more diverse assemblage of plants, including yellow pimpernel, common figwort, remote sedge and lady-fern. The stream side vegetation and the alder-dominated areas were characteristic of NVC community W7 *Alnus glutinosa* - *Fraxinus excelsior* - *Lysimachia nemorum* woodland. The invasive species Himalayan Balsam was recorded locally along the eastern and northern extent of the woodland.
- 7.25 Woodland W2 was an additional area of lowland mixed deciduous woodland, recorded in a mosaic with species-rich neutral grassland, and scattered trees along the steep-sided valley of Watercourse R2 which runs through the centre of the Site. Pedunculate oak was abundant within the canopy with ash and alder at lower frequencies. Hawthorn and holly were occasional amongst the scattered scrub understoreys. On the slope tops the ground flora displayed an acidic influence, characterised by common bent, with the herbaceous species such as foxglove and tormentil scattered throughout. In the sheltered valley sides, a cooler, damper influence was noted, evidenced by an increased incidence of the ferns broad buckler-fern, male-fern and hart's-tongue.
- 7.26 Woodland W3 was recorded along the steep banks of a ditch to the western extent of the Site. Pedunculate oak, sycamore and ash were co-dominant within the canopy. A healthy understorey was noted with frequent hazel and oak saplings recorded. The ground flora featured a reasonable diversity of species characteristic of old woodlands, with wood melick, dog's mercury, broad buckler-fern and Hairy-brome all recorded. Himalayan balsam was locally frequent at the slope bottom.
- 7.27 Neither Woodland W2 or W3 met the criteria to be classified as Biological heritage Sites.
- 7.28 Due to the age and native status of the canopy trees, together with the typical associated woodland ground flora, W1, W2 and W3 were classified as lowland mixed deciduous woodland, a priority habitat type. Therefore, woodlands on Site were considered to be an important ecological feature at a District scale.

Individual Trees

- 7.29 Across the Site, mature freestanding trees, particularly of pedunculate oak, were a prominent feature. A total of 37 freestanding trees in good condition were recorded within the Site, four very large, 29 large and four medium. Additionally, a mature row of trees was recorded on the

southern extent of the western boundary. The tree line featured two prominent large pedunculate oak trees, together with a further 3 medium sized oaks and a medium ash tree. A number of outgrown hazel stools and large holly bushes were also present. Trees are a common habitat type both nationally and locally, however large tree specimens provide intrinsic ecological value. Therefore, trees are considered to be of importance at a Local scale.

Ponds

- 7.30 Six ponds were noted during the habitat survey. All were dry by the time of the detailed GCN surveys in April and May 2025. Vegetation within the ponds was limited to primarily ONG species with an absence of aquatic or emergent vegetation and locally frequent Himalayan balsam at P1. All ponds within the Site were assessed as being in moderate condition, scoring well on water quality and the lack of artificial drains. Ponds are a declining habitat both locally and nationally however as the ponds onsite were classified as non-priority habitat, these are considered to be of importance on no more than a local scale.
- 7.31 When assessed against the criteria for selection as a Biological Heritage Site (BHS) within Lancashire, none of these ponds met the criteria to be selected.

Hedgerows

- 7.32 The boundary hedgerows comprise 80% native species, and as such, all the hedgerows met the criteria to be classified as priority habitat as described in S41 of the NERC Act. Two hedges (H3 and H5) supported an average of 4 or more species per 30m and were therefore classed as species rich. The remainder (H1, H2 and H4) were more species poor, averaging between 2 and 2.5 species per 30m section. None of the hedgerows met sufficient ecology criteria to be considered 'Important' under the Hedgerow Regulations 1997. The hedgerow network provides connectivity to the wider landscape and high, and the hedgerow network has been identified as being of local level importance.
- 7.33 When assessed against the criteria for selection as a Biological Heritage Site (BHS) within Lancashire, none of these hedgerows met the criteria to be selected.

Watercourses

- 7.34 Two streams are present. Both are noted as non-priority streams from a BNG perspective R1 lies on the Site's eastern boundary, with the stream issuing to the south of the Site near tree T1. The stream then flows south, along the western edge of Woodland W1, before exiting the Site via a culvert under Longsight Road. R2 flows south to north through the centre of the Site, issuing from a culvert under the railway and running through the steep-sided channel featuring woodland W2. Himalayan balsam was noted along the banks of both watercourses. Both watercourses have been identified as being of more than local level importance.
- 7.35 When assessed against the criteria for selection as a Biological Heritage Site (BHS) within Lancashire, none of these watercourse met the criteria to be selected.

Additional Habitats and Invasive Species

- 7.36 Other habitats within the Site were not assessed as IEF and include poor condition other neutral grassland, modified grassland, tall forbs, hawthorn and blackthorn scrub and a single wet ditch.
- 7.37 Himalayan balsam was frequently recorded across the Site in association with the watercourses, woodland, pond P1, scrub, hedgerow H1 and encroaching into the margins of

grasslands G1b, G6, G8 and G11. This species is not considered to be an IEF but was included in the assessment in a legislative context.

Fauna

7.38 Detailed faunal surveys have been completed at the Site and on the land surrounding the appeal Site in 2024 and 2025. The surveys undertaken by FPCR were completed over the optimal survey periods in 2024 and 2025. The species and groups surveyed over these periods included:

- Bats (activity surveys and roost assessment);
- Breeding and over wintering bird surveys;
- Great crested newt surveys.

7.39 From the completed assessments, the presence of badger, wintering and breeding birds, great crested newt, water vole and otter have not been identified as a statutory ecological constraint to the proposal. This is confirmed at Paragraphs 5.10 – 5.49 of the updated EcIA dated November 2025.

7.40 Breeding birds, Reptiles and Himalayan balsam are not considered IEF above a Site level, but were included in the impact assessment due to the protective legislation afforded to them.

7.41 Further details for the survey results covering other ecological receptors are provided at Appendices C – F of the submitted and updated EcIA's. A summary assessment of the findings is presented in Section 5.0 of the updated EcIA dated November 2025.

7.42 To assist the Inspector at this appeal, the following provides a resume of results for the bats, breeding and overwintering birds and great crested newts.

Bats

7.43 The following provides a summary of the completed bat surveys. Full details of the nocturnal survey information are presented in the submitted bat survey report (Appendix C: Updated EcIA (November 2025)).

Bat Roosts

7.44 No buildings are present within the Site. All bat records returned within the data search were for pipistrelle bat species (common, soprano and not identified to species level). No bat records directly refer to the Site.

7.45 Over the survey period:

- Three trees (T53, T57 and T37) were classified as PRF-M - containing features suitable for multiple bats and therefore may be used by a maternity colony.
- Two trees (T1 and T56) were classified as PRF-I - containing features only suitable for individual roosting bats.
- Seven trees (T37, T44, T62, T65, T67, T69, T72) were classified as FAR - further assessment required. These trees could not be climbed or had incomplete climbs due to either health and safety or the fact they could not be fully inspected.
- Six trees were classified as NONE – containing negligible features suitable for roosting bats.

7.46 Trees that were categorised as FAR or PRF-M were subject to further survey via three aerial assessments or three nocturnal surveys, where it was considered they may be impacted the scheme. This comprised the following:

- Three Aerial inspections of three trees – T57, T53 and T37
- Three Nocturnal Surveys of five trees- T44, T62, T65, T69, and T72.

7.47 These surveys found no evidence of roosting bats.

7.48 In addition to the above, one tree classified as FAR (T67) was not included in the further surveys as it was considered to be retained and suitably buffered from impacts.

7.49 Given the completed survey work, the presence of a bat roost has not been identified as a statutory constraint to the proposals..

Bat Activity

7.50 Seasonal activity surveys have been undertaken, following the requirements of the BCT Survey Guidance 2023 and comprising flightline and transect surveys in October 2024, April 2025 and July 2025, supplemented by monthly deployment of static detectors in October 2024 and between April and September 2025.

7.51 No Annex II bat species were registered or observed. The species assemblage recorded on Site is typical for the rural mixed agricultural and wooded habitat on Site and for the north of England.

7.52 The species diversity and number of bats shown to be using the Site consistently is low with less than 500 registrations per night. The most recorded species on Site was common pipistrelle comprising 74.89% of the bat contacts. This was also the most abundant species on transect and flightlines surveys. Common pipistrelle are the most common bat species in the UK and are widespread in all geographies. This was followed by soprano pipistrelle with 15.27% of registrations. Other species were recorded in low numbers and include Nathusius' pipistrelle (2.25%), Myotis Species (2.04%), Noctule (1.23%), brown long-eared (0.26%) and Nyctalus Species (0.08%)

7.53 The higher levels of activity were most active at static location 6, adjacent to W1 followed by location 2 situated in hedgerow H1. The most frequently used area of the Site for bats were the hedgerows, woodland and watercourse but the areas of open grassland did not form a significant proportion of the overall foraging habitat.

7.54 Nathusius' pipistrelle are considered a rare species in the UK but have long been considered to be under-recorded due to its migratory behaviour and relatively recent identification in the UK. Over the completed survey, significant activity from this species was not recorded. The recorded level of activity does not indicate the presence of a roost site either within Site or on land immediately adjacent to the Site. The level of recorded activity only suggests the habitat within the Site forms a minor proportion of the species' foraging resource.

7.55 The foraging area for Nathusius' pipistrelle and the other species recorded within the Site are not afforded statutory protection, but the use of such habitats is afforded a degree of protection under S41 of the NERC Act 2007. The protection only requires the decision maker to consider the potential effect of the scheme on the species and whether adequate mitigation and/or compensation is provided to maintain the conservation value of the species.

- 7.56 Overall, the Site has been assessed as being of no more than local value for foraging and commuting bats.

Breeding and Overwintering Birds

- 7.57 The breeding bird surveys have demonstrated that the Site supports common and widespread bird species typical of the habitats present onsite, predominantly consisting of a woodland bird assemblage including woodpigeon, wren and song thrush. The boundary hedgerows also offered suitable nesting habitat for notable species such as whitethroat, wren, dunnock and greenfinch.
- 7.58 The grassland field interiors are regularly grazed by horses and support a very limited assemblage of breeding birds. Small numbers of notable species including woodpigeon and starling utilised these areas for foraging. The streams running through the Site offered potential habitat for mallard, but no breeding behaviour was observed. The other waterbodies previously identified had largely dried up and were unsuitable for breeding birds.
- 7.59 Across the wintering bird surveys, a total of 41 species were observed, of which 19 were considered 'notable species' and include small numbers of stock dove, woodpigeon, black-headed gull, common gull, kestrel, rook, mistle thrush and redwing within grassland. The hedgerow and woodland blocks provided suitable foraging and sheltering habitat for the range of common and widespread generalist and woodland edge species recorded including sparrowhawk, wren, song thrush, house sparrow, dunnock, bullfinch and greenfinch. The streams running through the Site provided foraging habitat for mallard and grey wagtail.
- 7.60 From the completed surveys, due to the majority of species recorded being common and widespread, and found in relatively low numbers, the breeding bird and wintering bird assemblage has only been identified as no more than Site level importance. Breeding birds have been considered in a legislative context.

Great crested newts

- 7.61 The October 2024 habitat survey identified six ephemeral waterbodies on Site (P1 – P6) and the desk study identified three further ponds (P7 – P9) within 250m of the Site boundary. Suitable terrestrial GCN habitat is present on Site, within areas of grassland, woodland, scrub, ditches and hedge and tree bases.
- 7.62 During the GCN field survey, it was found that all ponds within the Site boundary were dry and also P7, located 115m off-site to the north east. Considering the general vegetated state of these ponds, with the absence of much bare ground, aquatic or emergent vegetation, they are likely to be ordinarily dry. As such, it is concluded these are unlikely to support breeding GCN.
- 7.63 Pond 8, a domestic garden pond stocked with fish, returned a HSI score of "poor" and the presence/absence surveys confirmed absence of GCN in this pond.
- 7.64 Pond 9, which is also a garden pond is located approximately 36m to the southwest of the Site boundary. Access was not granted to survey this pond. However, from aerial photographs this pond appears to be an ornamental pond is most likely also stocked with fish in addition there are no other ponds which are likely to support GCN within 250m. As such the likelihood of it supporting an isolated population GCN is considered to be very unlikely.

- 7.65 Given the above, the presence of GCN has not been identified as a statutory constraint to the proposed development.

8.0 INHERENT MITIGATION, DESIGN AND EVOLUTION

- 8.1 From the completed ecological surveys, the key ecological resources within the Site have been identified as:
- the Ancient Woodland (W1) including the Veteran tree to the northeast of the site,
 - the areas of lowland mixed deciduous woodland (W2/W3),
 - the mature trees scattered across the Site,
 - the watercourses,
 - the hedgerow,
 - the lowland meadow.
- 8.2 Outside the above-mentioned habitat areas, the majority of the grassland is moderately species-rich other neutral grassland in good and moderate condition. None of these grassland areas are subject to positive conservation management. Due to the geographical location of the Site, other neutral grassland of this condition is a widespread habitat locally and this grassland habitat has only been assessed as being of local level value.
- 8.3 The scheme has been carefully designed to avoid loss of habitats which cannot easily be either translocated or replaced in a short timeframe. These habitats include the woodland habitat and the watercourse. The proposals have also sought to maximise retention of existing hedgerows and mature trees.
- 8.4 Whilst development of the Site will inevitably require the loss of other neutral grassland, the proposals have sought to retain and enhance through management areas of other neutral grassland in good and moderate condition along the central watercourse and to the east of the site. These areas of other neutral grassland affected by the proposals are a 'medium distinctiveness habitat', but the areas of grassland are not positively managed for nature conservation, and the grassland does not represent a habitat type listed on S41 of the NERC Act. Given the agricultural nature of these habitats, these habitats are easily re-creatable with habitats of similar quality.
- 8.5 A number of mature trees with features suitable to be used as a bat roost were identified over the survey period, but no bat roost sites were identified in the trees. Where feasible, the scheme has retained these potential roost sites in the design. The scheme also retains the key foraging areas and commuting routes identified during the completed bat activity surveys.
- 8.6 The breeding and winter bird surveys did not identify significant assemblages. Ground nesting species, including skylark were not identified using the appeal site, and the majority of the recorded assemblage was associated with the retained boundary features.
- 8.7 In terms of other protected or notable species, the habitats within the Site were not identified as being suitable to support common reptile species and the presence of other protected including badgers and GCN was not identified.
- 8.8 Since submission of the planning application in March 2025, the overall mitigation and compensation package underpinning the design has evolved.

- 8.9 The ancient woodland is separated from the wider site by the watercourse referenced R1, which forms a shallow watercourse channel along the woodland edge. This topography effectively provides isolation between the woodland and the root protection area of the woodland. The proposals also provide a 15m buffer from the woodland edge, and no built development is proposed in the buffer.
- 8.10 The identification of a poor condition lowland meadow in July 2025 required review of the overall design of the scheme. Through the site's infrastructure requirements, retention of the lowland meadow in situ was not possible without a degree of fragmentation and long-term risk to its survival. Consequently, the overall landscape proposals were redesigned to allow the translocation of the majority of this grassland to the northwest of the site.
- 8.11 Grassland translocation and grassland creation techniques have advanced in recent years, and grassland translation completed to enable the HS2 project has been proven to be successful. Translocation of grassland of a similar grassland type was also accepted by the Inspector at Bishop Itchington. Given this, it is my view that translocation of the lowland meadow outside the main area of the site's open space is the optimal solution in this case, avoiding the potential risks associated with retention in an urban environment.
- 8.12 Taking account of the comments provided by the local authority in June 2025, the appellant has also revised the overall net gain package, reducing the target distinctiveness for retained neutral grassland in the sites' open space. This amendment has increased the overall number of off-site biodiversity units the proposals require from an off-site strategic-level habitat bank. In my view, the use of a greater proportion of off-site units is logical, as the off-site provision allows the creation of larger areas of diverse habitat in strategic locations in addition to those habitats retained and provided within the site. This follows the basic principle of biodiversity net gain being 'bigger, better and more connected'.
- 8.13 Considering the nature of the habitats within the site, the overall proposals will retain the lowland meadow through translocation and the sensitive management of the lowland meadow will, in the long term, increase the value of the grassland. Whilst not strictly required by the scheme, the appellant has sought to provide further lowland meadow habitat units off-site at the 'Moreton Park Habitat Bank'. This is a strategic-level habitat bank with an agreed habitat enhancement scheme and legal agreement. The purchase of these lowland meadow units ensures that when taken as a whole, the overall development proposals will achieve a net increase of at least 113% (ie over twice as much in area terms as currently exists on site) in lowland meadow locally (expressed in biodiversity units). This increase of a priority habitat, is a significant benefit of the scheme.
- 8.14 Notwithstanding the above, I note that the overall mitigation and compensation package for the original resubmission exceeded the minimum 10% requirement, and this provision remains above 10%. In addition, the trading rules of the metric are satisfied in all submissions. This remains the case for this appeal. The stance taken by the Council at the point of determination remains difficult to follow, therefore.
- 8.15 Given that the proposals have sought to maximise those habitats of greater ecological value and those habitats that cannot easily be replaced in a shorter time, the proposals are considered to meet the requirements of the mitigation hierarchy as outlined at 193(a) of the NPPF.

9.0 ASSESSMENT OF POTENTIAL EFFECTS, MITIGATION AND BNG

9.1 An assessment of potential effects and mitigation for the various IEF is provided at Section 6.0 of the updated EclA. This assessment provides a robust assessment of the proposals, and my evidence adopts the assessment.

9.2 The following provides a summary and additional clarification where required.

Statutory and Non-Statutory Designated Sites

9.3 Development of the Site will not affect the conservation value of any statutory or non-statutory designated site within the Zone of Influence surrounding the Appeal Site.

Habitats

9.4 Mitigation by design has sought to retain and appropriately buffer all areas of lowland mixed deciduous woodland within areas of proposed greenspace. Additional tree planting is proposed within greenspace provision. The ancient woodland to the northwest of the site is retained in a 15m buffer.

9.5 Public access to the area of ancient woodland is not included as part of the proposals. Rather, to discourage public access to the ancient woodland, the boundary will be demarked either through the implementation of a fence or a native species hedgerow. A condition to this effect is proposed. Since there is presently evidence of trespass within the woodland this is a benefit of the proposals.

9.6 Proposed public open space footpaths have been limited to a single path through the retained central woodland belt and defined footpaths in the open grassland areas. These footpaths will be created so these are clearly delineated and soft barriers are included to discourage additional desire lines being created through the habitat provided across the site. Additionally, extensive provision for recreational open space has been provided outside of the retained woodland areas within the Illustrative Masterplan.

9.7 The updated habitat survey identified a relatively small area of lowland meadow in poor condition (0.8796ha). This area of lowland meadow only represents 0.17% of the regional area of lowland meadow. Lowland meadow is not listed as an irreplaceable habitat by the NPPF and the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 but it is listed as a habitat of principle importance under S41 of the NERC Act.

9.8 Across other areas of the Site, other neutral grassland in good and moderate condition are present. These areas of other neutral grassland are widespread habitats which are not also listed as irreplaceable habitats or classified as habitats of principal importance under S41 of the NERC Act.

9.9 Despite the presence of these grassland habitats, the site is not subject to positive management for grassland and despite the lowland meadow being a S41 habitat, there are currently no effective control mechanisms to ensure positive conservation management of the grassland. Positive management of grassland for nature conservation generally includes hay cutting and aftermath grazing to create areas of bare ground. Without such management, there is a gradual decline in the herb assemblage of the grassland as coarse grassland species outcompete the herb species.

- 9.10 Lack of positive grassland management is important as there are two key threats to grassland of nature conservation importance: lack of sympathetic management and abandonment of management. Examples of unsympathetic management are:
- over-grazing, leading to poaching;
 - under-grazing leading to a gradual decline of species richness;
 - inappropriate grazing regime limiting the ability of herbaceous vegetation to flower and set seed,
 - the use of herbicides; and
 - the application of artificial fertilisers.
- 9.11 Abandonment allows the process of natural succession to take place; initial scattered scrub development progresses to continuous scrub and then secondary woodland, and the grassland interest is eventually lost completely through shading. It will be readily appreciated that lack of sympathetic management and/or abandonment are matters that, in the absence of legal agreements or planning conditions, cannot be controlled by an LPA. As such, the nature conservation interest could readily be lost.
- 9.12 The vulnerability of grassland to changes in management is highlighted in Appeal Decision APP/R1038/A/13/2192164, whereby the Inspector accepted the owner's right to treat, plough and seed a species-rich grassland eligible for LWS selection with a commercial seed mix to the detriment of its grassland interest. The important difference from the present case is that the value of the site was lost before the appeal proposal was brought forward. This is not the case here and the development proposals offer the opportunity to ensure areas of lowland meadow and other neutral grassland are maintained on the site.
- 9.13 The proposals include the translocation of the majority of the lowland meadow within the Site itself. This translocation and appropriate long-term management of the lowland meadow will ensure the resource is retained within the site, but without the provision of further compensation, a minor residual effect at a district level is recognised. The proposals do consider this minor residual effect, and as a whole, the scheme has secured through the strategic level habitat bank additional lowland meadow habitat units. These additional lowland meadow habitat units will provide an overall uplift of 113% (of Biodiversity units) in lowland meadow, and as such, the residual effect following compensation is reduced to a not significant positive effect.
- 9.14 In terms of the areas of other neutral grassland, development of the Site will result in a reduction of habitat area but the open space has been designed to maintain and enhance approximately 3.47ha of better-quality area of the habitat. Whilst the proposals will result in the loss of 1.84ha of good and 3.05ha of moderate condition other neutral grassland, as discussed above, without appropriate management, the value of this grassland is likely to be lost in the medium term. Mitigation / compensation included in the proposals include enhancements to the retained areas of other neutral grassland in the open space through long-term sympathetic management. The inevitable residual effects arising from the loss of grassland are compensated fully through the purchase of off-site other neutral grassland habitat units. The purchase of these units provides an overall package that achieves a net gain of 5.2% in other neutral grassland units. Considering the current uncontrolled nature of the

grassland management within the site, the overall net gain in grassland units ensures any residual effect is neutral to a not significant positive effect.

- 9.15 To facilitate access to the site, there will be a loss of some existing native species hedgerows. The development of the site as a whole will result in the loss of a small number of mature trees and the culverting of the watercourse to enable the implementation of the sites infrastructure. The potential effects arising to these receptors are fully mitigated in green infrastructure of the Site. Through the application of these measures the overall effects to ecological features have been assessed as neutral.
- 9.16 The retained woodlands and watercourse have the potential to be impacted indirectly during the construction phase of the development by dust deposition, particularly in periods of dry weather and higher wind and compaction from construction traffic. During the operational phase via increased recreational pressure. Over the construction period, such effects can be avoided through the implementation of measures outlined in a CEMP. The potential effects of increased recreational pressure on the areas of retained habitat will be mitigated through the use of appropriate signage and the provision of some area of high quality formal open space. Again, through the provision of mitigation, any residual effects will be at least neutral and probably beneficial.
- 9.17 Further details on the habitat retention and enhancements proposed across the scheme are outlined in the biodiversity net gain section below.

Biodiversity Net Gain

- 9.18 An updated and full Biodiversity Net Gain Assessment dated November 2025 has been submitted to the LA. As with the previous assessment, this confirms that a biodiversity net gain exceeding the minimum 10% requirement can be achieved.
- 9.19 Table 1 below provides the headline results for the number of habitat units present within the site, the overall effects of the proposals and the resultant number of units following the implementation of mitigation / compensation both on-site and offsite.

Table 3: Headline Biodiversity Net Gain Results

On-Site Baseline	Habitat Units	145.52
	Hedgerow Units	3.94
	Watercourse Units	6.41
On-Site Post-Intervention	Habitat Units	111.16
	Hedgerow Units	4.90
	Watercourse Units	7.26
On-Site Net Unit Change	Habitat Units	-34.35
	Hedgerow Units	+0.96
	Watercourse Units	+0.85
On-Site Net Percentage Change	Habitat Units	-23.61%
	Hedgerow Units	+24.37%
	Watercourse Units	+13.30%
Off-Site Habitat Units	Baseline	23.05
	Post intervention	75.08
	Net Unit Change	52.03

Final Results – Habitat Units	Combined Net Unit Change	+17.68
	Combined Net Percentage Change	+12.15%

- 9.20 Table 2 focuses on the overall assessment of the effects of grassland habitat prior to and following the implementation of onsite / offsite mitigation and compensation.

Table 4: Grassland summary table

On-Site Grassland Habitats Baseline	Lowland Meadow	Area (ha)	0.8796
		Units	7.04
	Other Neutral Grassland	Area (ha)	16.301
		Units	107.8
On-Site Grassland Habitats Post-Intervention	Lowland Meadow	Area (ha)	0.7954
		Unit Change	+1.92
	Other Neutral Grassland	Area (ha)	4.0603
		Unit Change	-56.37
Off-Site Unit Change	Lowland Meadow	Area (ha)	1.525
		Unit Change	+13.07
	Other Neutral Grassland	Area (ha)	10
		Unit Change	62.02
Project Wide unit change	Lowland Meadow	Area (ha)	2.3204
		Unit Change	+14.99
	Other Neutral Grassland	Area (ha)	14.0603
		Unit Change	+5.65

- 9.21 The submitted biodiversity net gain assessment has been updated to the time when the appeal is lodged. This updated assessment incorporates the results of the detailed botanical surveys. As a result of these detailed botanical surveys, the grassland habitats recorded within the Sites baseline have been amended, variously, to change their extent, classification and condition from those submitted with the application.
- 9.22 The updated Biodiversity Net Gain Assessment, dated November 2025, confirms development on the appeal Site will result in the loss of 34.51 habitat units. This loss will be addressed through off-site biodiversity units from a local habitat bank located within 4km of the Appeal Site.
- 9.23 The vast majority of the site comprises medium-distinctiveness grassland habitats. The central river corridor and the eastern section of the Site comprise habitats of higher biodiversity value, including very high distinctiveness lowland meadow grassland, high distinctiveness woodland, including Woodland W1, which is an irreplaceable habitat and contains an irreplaceable veteran tree, and medium distinctiveness other neutral grassland in moderate and good condition. The western section of the site comprises grasslands of low species diversity (modified grassland and other neutral grassland in poor condition).
- 9.24 Proposals will retain, appropriately buffer and enhance the ancient woodland W1, and the veteran tree recorded within it. Impacts to other two other high distinctiveness, but non ancient woodland habitats have been avoided, one of which (W2) will be enhanced as part of the proposals.
- 9.25 The updated biodiversity net gain assessment has assumed the loss of the entirety of the 0.8796ha of lowland meadow recorded within the appeal Site. Of this total, 0.7726ha will be

translocated to the western section of the Site, replacing the existing modified grassland field M1. The remaining 0.107ha of lowland meadow, which is present within 10m of the watercourse will not be translocated and will be in effect retained but treated as lost and recreated as other neutral grassland within the statutory biodiversity metric, to account for the risk of degradation.

- 9.26 Within the Statutory Metric, the translocated lowland meadow grassland has been treated as lost in its original location and created lowland meadow in the proposed receptor site. A 5-year 'created in advance' multiplier has been added to the created habitat, so as to take into account the benefits of translocating an existing habitat compared to creating it from a modified grassland baseline. This reduces the time to target condition and difficulty multipliers within the metric but still accounts for a proportionate degree of risk in delivery.
- 9.27 The majority of losses resulting from the proposals are from medium-distinctiveness grassland habitats. The design has sought to focus development on the western section of the site, which contains predominantly neutral and modified grassland in poor condition. Although significant areas of the moderately species rich grassland (Other Neutral Grassland in Good and moderate condition) recorded within the central river corridor and to the east of the Site will be retained and enhanced as appropriate, there will be an overall loss of 72.7 units of medium distinctiveness grassland within the site, which is not fully compensated for within the appeal Site.
- 9.28 The majority of mature free-standing trees have been retained and buffered as part of the proposals, with five large and four medium trees lost.
- 9.29 The proposals will remove 160m of species poor native hedgerow (H1), to facilitate access and the visibility splay. To achieve the 10% requirement, an additional 239m of species-rich native species hedgerow has been provided within the appeal site. With the inclusion of this new hedgerow planting, the appeal proposals provide an uplift of 0.96 hedgerow units. This is a net gain of 24.37%.
- 9.30 To facilitate the implementation of the site infrastructure, there is a requirement to culvert 32m of the central watercourse R2. The remaining watercourse are retained and appropriately buffered. Achieving the 10% net gain requirement for watercourses will be achieved by enhancing R1 to the east by simple enhancements comprising bank reprofiling, control of invasive species, removal of grazing impacts and large trash. These enhancements provide an uplift of 0.85 watercourse units (a net gain of 13.3%).
- 9.31 In summary, the overall biodiversity net gain provisions proposed for this appeal provide an overall net loss of 23.61% in habitat units, but a net gain of 24.37% in hedgerow units, and 13.3% in watercourse units. The net loss in area habitats will be addressed through offsite biodiversity units from a local habitat bank located within 4km of the Appeal Site.
- 9.32 The translocation of the lowland meadow grassland affected by proposals seeks to maintain this habitat within the site, with inherent design measures and secured appropriate management, facilitating the enhancement of the resource in the medium to long term. As a result, the trading rules are satisfied for this habitat type within the Appeal Site, with an increase of 27% in lowland meadow biodiversity units on Site. In addition to this, a bespoke compensation solution is proposed whereby the offsite Biodiversity units purchased to deliver a Biodiversity Net Gain will comprise a mixture of lowland meadow units and other neutral

grassland units. With the additional off-site lowland meadow, the scheme will provide an additional 1.525ha of the priority habitat lowland meadow. This is a clear benefit of the scheme, and the provision of a priority habitat should be supported from a local policy perspective.

- 9.33 Given the nature of the other neutral grassland habitats affected by the proposals, the loss of these grasslands, is in my professional opinion, acceptable. It follows the requirements of the mitigation hierarchy as the proposals have sought to avoid significant harm, avoid areas of high-value habitats, and it has maximised onsite provisions. Despite this the trading rules are not satisfied for this habitat type within the Appeal Site, with a decrease of 53% in other neutral grassland biodiversity units on Site. As part of the bespoke compensation solution described above, the offsite Biodiversity units purchased to deliver a Biodiversity Net Gain will comprise a total of 42.02 other neutral grassland units, which together with the onsite measures, will result in a 5.2% increase in other neutral grassland biodiversity units locally.
- 9.34 The purchase of 10.02 lowland meadow units and 42.02 other neutral grassland units from Moreton Park Habitat Bank will lead to an 12.15% increase in area based habitat units resulting from proposals. The provision of such enhancements is in accordance with the rules of biodiversity net gain and is expected with the PPG for biodiversity net gain.

Protected and Notable Species

- 9.35 A detailed assessment of the potential effect on protected species is provided in the updated EclA dated November 2025. This assessment has been informed by the additional ecological survey work completed over the period of 2024 – 2025, the results of which are summarised in Section 7: Paragraphs 7.37 – 7.64. These surveys have not identified the presence of roosting bats, badger, wintering and breeding birds, great crested newt, reptiles, water vole and otter. Consequently, the following provides a summary of the potential effects and the proposed mitigation for foraging and commuting bats as the only species recorded as an IEF within the EclA.

Bats - Foraging / Commuting Activity

- 9.36 The completed survey work identified an assemblage of bats using the Site as a foraging and commuting resource. This assemblage was dominated by common and widespread species but included a low level of use from the less common *Nathusius pipistrelle*.
- 9.37 There was no evidence however, that the habitats on Site provide any significant value to local bat populations. Activity surveys showed very low bat foraging activity over the Site and low-level commuting and foraging behaviour along the hedgerows and woodland edge
- 9.38 Mitigation by design has included habitat retention in addition to habitat enhancements and creation of additional habitats of higher value to foraging, roosting and commuting bats. Existing retained hedgerows will be enhanced with species-rich planting, including a small, wooded area to the northwest, along the central water course, and individual trees throughout, which will support a higher diversity of invertebrates. This will improve the foraging resource for bats in these areas. The strengthened existing hedgerows and new proposed planting will ensure that potential commuting corridors on Site will not be negatively impacted.
- 9.39 There will be a small loss of hedgerow H1, and P3 which may be lost to the development. However proposed greenspace and tree planting adjacent to this, will maintain provision of suitable commuting and foraging habitat in this location.

- 9.40 The key areas of bat activity recorded during the activity surveys were associated with the woodland, the watercourses and the northern boundary hedgerow H1. Whilst uncontrolled lighting on in these areas is unlikely to affect the favourable conservation status of the species at a population level, unmitigated lighting could result in some minor disturbance along these commuting routes / foraging areas.
- 9.41 Such effects can be minimised and avoided through the use of 'hop-over' at the site access and the application of a standard planning condition requiring the submission of a lighting strategy. This lighting strategy would require lux levels on the sensitive habitats, outside of the main access, to be restricted to 0.2lux in the horizontal plane and 0.5lux in the vertical plane. The application of these lux levels is known to avoid and minimise potential effects to bat foraging and commuting behaviour.
- 9.42 Impacts are considered highly unlikely to affect the favourable conservation status of the local bat population. Therefore, the unmitigated impacts during both the construction and operational phases would be considered not significant negative impact at a Local scale.
- 9.43 Overall, through the application of the mitigation measures outlined above, it is expected that the proposals will result in a Neutral effect on the local population.

Legislative Context Only.

- 9.44 The completed survey work did not identify roosting bats, breeding birds, reptiles and Himalayan balsam as Important Ecological Features. However, they have been considered in a legislative context below.

Bats - Roost Sites

- 9.45 It is unlikely that the proposals will result in any impacts to bat roosts, either directly or by impacting commuting routes of significant roosts (maternity). Additionally, lack of any evidence found to support the presence of bat roosts during the surveys indicates a likely absence of high-status roosts within the surveyed trees. However, there is a residual risk of occasional or intermittent bat use of the roost features identified within trees classified as PRF-M and PRF-I.
- 9.46 Additionally, indirect impacts to potential roosts within the woodlands may be caused potential adverse impact and/or by light disturbance during the construction and operational phases of the proposed development.
- 9.47 Any required works to trees identified as PRF-I, PRF-M or FAR must be preceded by an updated assessment of their bat roost potential by a suitably qualified ecologist, in order to prevent potential harm to roosting bats.
- 9.48 A pre-works detailed inspection and/or nocturnal survey (where aerial assessment is considered unfeasible) of potential roost features should be undertaken prior to any works to T37, T53, T57, T1, T56 T44, T62, T65, T67, T69 and T72 to ensure the continued likely absence of roosting bats.
- 9.49 Loss of potential bat roost features can be mitigated via the provision of replacement roost features, in the form of a suitable and long-lasting bat box (at least one box per impacted roost feature), located on the new buildings, or on suitable trees, to be agreed by a suitably qualified ecologist.

- 9.50 Although potential roost features have been identified, the ecological survey work has not identified the presence of a bat roost within the Site. Given this, and the retention of suitable roost sites within the proposals and the provision of additional roost sites will inevitably result in positive effects on the local bat population.

Breeding Birds

- 9.51 The completed survey work did not identify a significant assemblage of either breeding or overwinter birds. Ground nesting species were not identified, and the majority of the recorded species were associated with the retained boundary features.
- 9.52 The provision of the enhancements to the boundary features, the additional hedgerow and wetland features in the green infrastructure, and a range of bird boxes for swift, swallow, and other generalist species on the new residential dwellings provides adequate mitigation, fully mitigating the effects of the proposals.
- 9.53 Over the construction period, the implementation of standard working methods will be required to avoid effects over the main breeding season.
- 9.54 Through the application of the package outline above, minor positive effects on the local breeding and overwintering bird populations are expected.

Reptiles

- 9.55 Habitats on-site provided limited value for reptilian species as the Site lacks the ideal structural diversity and mosaic of habitats typically required by reptiles for basking, sheltering and foraging in close proximity. The modified and other neutral grassland recorded across the majority of the site is considered largely sub-optimal, given the homogenous sward. Localised areas associated with the field and woodland margins could provide the structural diversity required to support reptiles. These areas are primarily retained and enhanced within the proposed design. As such, the habitats within the Site that are largely to be affected by the proposals are considered largely unsuitable. Given this, and the lack of recent records in the local area, the presence of reptiles is considered unlikely.
- 9.56 During construction, appropriate precautions will be incorporated into a CEMP which will be implemented to prevent intentional (or accidental) killing or injury which would potentially be a breach of the Wildlife and Countryside Act 1981. This would include a method statement for clearance works in suitable habitat.

Himalayan Balsam

- 9.57 The invasive plant Himalayan balsam was noted in W1, W3, ONG6, ONG8, P1, SC1, H1, R1, R2 and D1.
- 9.58 Himalayan Balsam is listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), which imparts a legal obligation for no action to take place which might result in this species being caused to grow in the wild. Furthermore, the presence of this species is undesirable for biodiversity value of the Site. In the absence of mitigation, it is possible that an offence could be committed.
- 9.59 The detailed CEMP will include a strategy for the monitoring and eradication or control of this species prior to, during and after development.

10.0 ASSESSMENT OF THE REASON FOR REFUSAL AND COMPLIANCE WITH GUIDANCE & POLICY

Reason for Refusal 4 (RfR4)

- 10.1 In simple terms, RfR4 was applied to the decision notice as the ongoing ecological survey work had not been completed, and findings of the surveys were submitted to the LA, when the planning application was considered by the planning committee. Notwithstanding this RfR the ecological survey work has been completed and has been submitted to the LA.
- 10.2 In the absence of the completed survey work and assessments, RfR4 considered two main elements. Firstly, the updated surveys were necessary to allow an assessment of the importance of the habitats present within the site and provide an assessment of the potential effect of the proposals on these habitats. Secondly, the updated survey work was necessary to allow the local authority to assess whether the proposals would affect protected species which were potentially using the Site.
- 10.3 Without the completed assessment work, the council considered that the proposals were contrary to the statement EN4 and policy DME3 of the Ribble Valley Core Strategy and the National Planning Policy Framework.
- 10.4 The Key Statement ENV4 seeks to avoid negative impacts on biodiversity. Where adverse effects to a site of recognised environmental or ecological importance are identified, ENV4 allows the proposals to be permitted, where the developer can demonstrate the potential effects of the proposals can be mitigated or at a last resort compensated. The statement also requires the submission of appropriate survey information and for sites that are not covered by a statutory designation, the statement identifies that compensation could be management through a mechanism such as biodiversity off-setting. Thus, from the perspective of ENV4 as the site is not designated the use of off site compensation is acceptable.
- 10.5 Policy DME3 is not strictly related to the submission of ecological survey work, but the policy protects a range of ecological features, including protected species and priority habitats or species identified in the Lancashire Biodiversity Action Plan. Clearly, the identification of such features does require the submission of relevant ecological survey work.
- 10.6 Turning back to RfR4, the following assesses the merits of the RfR against the ecological survey work completed to support the appeal proposals and the potential effects to the recorded habitat and species.

Habitats

- 10.7 An assessment of the habitats present across the site is provided in Paragraphs 7.9 – 7.36 Section 7 above. Paragraphs 9.4, -9.16 Section 9 above, presents my assessment of the potential effects on the habitats. Taken at a basic level and without further analysis, the submission of this ecological information and the overall mitigation strategies proposed should be adequate to resolve RfR4. Given the nature of some of the component habitats within the site, the following evidence provides further analysis of the proposals to assist the Inspector at this appeal.
- 10.8 The key habitat types recorded across the site include:
- The ancient woodland and associated veteran tree;

- The area of lowland mix deciduous woodland,
 - The small area of lowland meadow,
 - Areas of other neutral grassland,
 - The watercourse, and
 - Hedgerow and mature trees.
- 10.9 To avoid unnecessary repetition, my evidence demonstrates that the proposals provide adequate mitigation to fully mitigate the potential effects of the proposed to the watercourse, the hedgerows, the individual and the lowland mixed deciduous woodland. Given this, the following evidence focuses on the proposals and the potential effects of the proposals on the ancient woodland, the lowland meadow and the areas of other neutral grassland. An assessment of the implications of biodiversity net gain is provided under RfR5.
- 10.10 Other than the area of ancient woodland and the individual veteran, which are afforded policy protection through the NPPF, none of the remaining habitats are afforded statutory designation as referenced in the Key Statement of ENV4. Given this, in the broad context of ENV4, potential effects on these non-designated ecological assets could be managed through biodiversity offsetting.
- 10.11 The completed ecological survey work identified that the quality of the ancient woodland asset is being degraded through uncontrolled grazing, and the ancient woodland was identified as being in poor condition. The proposals have retained the ancient woodland and the associated veteran tree. In terms of the ancient woodland, a 15m buffer zone has been provided around the woodland, and the proposals will provide long-term positive management to improve the overall structure of the ground layer in the woodland.
- 10.12 The area of ancient woodland is situated outside the built development from the opposite side of the watercourse. Given this geographical location, increased recreational pressure during the operation phase of the development is not expected. Notwithstanding this, the proposals will delineate the edge of the woodland through the implementation of a hedgerow or a fence to minimise potential increased recreational use of the woodland.
- 10.13 Given the design of the scheme and the mitigation proposed within the scheme, the quality of the ancient woodland will be enhanced, and the ancient woodland will be protected. This mitigation and design ensure compliance with the requirement of Paragraph 193 (c) of the NPPF and the policy protection provided by the Key Statement ENV4 and DME3.
- 10.14 As discussed in my evidence, a small area of lowland meadow in poor condition is present within the site. The lowland meadow is a priority habitat as listed in S41 of the NERC Act and does meet the criteria to be classified as a Lancashire Biodiversity Action Plan. This area of lowland meadow does not meet the criteria to be selected as a Biological Heritage Site (BHS). Given the classification as a priority habitat, the lowland meadow is afforded a degree of policy protection under ENV4 and policy DME3.
- 10.15 To facilitate the Site infrastructure, it is not possible to retain and avoid the area of lowland meadow. In the broader sense, whilst it is possible to retain areas of lowland meadow within the residential context, the site allows translocation of the grassland outside the main area of open space to an area where long-term sympathetic management can be achieved. This translocation will retain the ecological resource in the long term, and the translocation of such

habitats has been found acceptable at other sites, including the appeal decision of Bishop Itchington.

- 10.16 When considering the acceptability of translocation, it is important to consider the baseline conditions of the habitat and the current management. The current management regime and the security of the current management regime were important considerations outlined in both the Drakes Broughton and Bishops Itchington appeal decisions.
- 10.17 At this appeal site, the area of lowland meadow is not actively managed for nature conservation, and the completed botanical surveys have demonstrated the grassland is in poor condition. Given this, and as outlined in Paragraphs 9.9 – 9.12, without intervention, it is likely that the quality of the grassland will be lost in the medium term. Consequently, it is my view that translocation of the lowland meadow is acceptable to ensure the resource is retained.
- 10.18 Whilst unmitigated development of the site would result in significant harm to this receptor through the loss. The application of mitigation / compensation comprising translocation of the lowland meadow does reduce the overall harm to the receptor to a minor negative effect at a district level. Assessment using the quantitative assessment approach of the Statutory Metric demonstrates translocation avoids a net effect on lowland meadow. This quantitative assessment does support the conclusion that the scheme avoids significant harm and the proposals comply with the overall requirements of the mitigation hierarchy outlined at Paragraph 193 (a) of the NPPF. The approach to the mitigation hierarchy also follows the appeal decision of Drake Broughton and Bishop Itchington.
- 10.19 Notwithstanding the outcome of the Statutory Metric, the proposals are going further than the basic requirements. Through the application of the mechanism of biodiversity off-setting, the proposals have secured additional lowland meadow biodiversity units at the Moreton Park Habitat Bank. These additional lowland meadow habitat units provide an overall increase in the local lowland meadow resource of 113% and secures 1.5ha of additional lowland meadow on a regional basis. This in my view, ensures that any potential residual effects to lowland meadow is neutral.
- 10.20 Although policy DME3 does not highlight the potential use of biodiversity off-setting to avoid potential effects to priority habitats, the Key Statement EN4 does allow the use of biodiversity offsetting for ecological features which are not afforded statutory protection, provided the developer identifies the scheme. This appeal is supported by a registered habitat bank scheme where a deposit has been paid by the appellant to secure the relevant habitat units. Given this, it is my view that despite affecting priority habitats, the proposals comply with the overarching policy requirement outlined in the Key Statement ENV4.
- 10.21 As outlined at Paragraph 9.13 Section 9, whilst the proposals have sought to retain areas of other neutral grassland in good and moderate condition, overall, without the application of off-site compensation, development of the site will result in the loss of other neutral grassland. This grassland has not been identified as a priority habitat as defined in S41 of the NERC Act or the Lancashire BAP. Consequently, unlike the lowland meadow, this grassland is not afforded the same degree of policy protection as the small area of lowland meadow.
- 10.22 Notwithstanding this assessment and whilst the application of compensation is seen as the last resort, as with the lowland meadow, the other neutral grassland is not positively managed for nature conservation and there are currently no control mechanisms to enforce such

management. In this context, and considering the proposals have maximised the retention and enhancement of other neutral grassland within the site, the use of off-site compensation is considered an acceptable form of mitigation.

- 10.23 As discussed above, the Key Statement ENV4 does allow the use of biodiversity off-setting, provided the developer secures an acceptable scheme. In the context of this appeal, the appellant has secured credits in a registered habitat bank. Therefore, in simple terms the proposals comply with the relevant core strategy policies.
- 10.24 Given there is currently no long-term security for the management of the components of other neutral grassland and the proposals have retained and enhanced area of other neutral grassland, it is my view that the proposals also follow the requirements of the mitigation hierarchy as outlined at Paragraph 193 (a) of the NPPF.

Protected Species

- 10.25 As outlined in Section 7 of my evidence, additional protected species survey work was completed over the optimal period from March – July 2025. These surveys included:
- Bats (roost sites / foraging and commuting activity surveys),
 - Breeding birds,
 - Reptiles,
 - Aquatic survey for GCN in suitable waterbodies.
- 10.26 The habitats within the Site were not considered to provide optimal conditions for reptiles or watervole, and the presence of badger was not recorded.
- 10.27 The additional ecological survey work for protected and notable species did not identify any statutory ecological constraint from protected species. In common with the vast majority of green field sites on the edge of settlement, assemblages of overwinter / breeding birds and foraging/commuting bats were recorded. The recorded assemblage of these groups was not considered to be significant, and with the application of the mitigation outlined at Section 9, it is my view that the proposals can fully mitigate the effects of the proposals.
- 10.28 Whilst the exclusion of the protected and notable species information from the original submission did warrant the application of RfR4, it is my view that the completed survey work fully resolves the council's original concerns outlined through the application of RfR4.
- 10.29 In simple terms, the additional information submitted to the LA in the updated EclA and Biodiversity Net Gain Assessment dated 2025, provides all of the relevant ecological information and the relevant assessments requested by the council shortly before refusal of the application in June 2025. It is my view that this survey work, assessment and subsequent updates to the overall mitigation strategy confirm that the proposals will not result in significant adverse effects, and the proposals are acceptable when assessed against the requirements of local and national planning policies.

Reason for Refusal 5 (RfR5)

- 10.30 RfR5 relates to biodiversity net gain and the local authorities, considering that inadequate information has been submitted to demonstrate that the biodiversity net gain objective can be met and the biodiversity condition can be discharged.

- 10.31 An Updated Biodiversity Net Gain Assessment (dated November 2025) has been submitted to the council. Overall, the assessment confirms the scheme is capable of achieving in excess of the minimum 10% net gain requirements for habitats, hedgerows and watercourses. A summary of these provisions is provided at Section 9 Tables 3 & 4.
- 10.32 Section 6.0 of my evidence provides a review of the key elements of the government guidance for the proper application of Biodiversity Net Gain. In simple terms, Paragraph 001 of the PPG is clear that the 'biodiversity objective' is the requirement that most development will provide a 10% net gain to biodiversity, and this objective is met through the application of the 'biodiversity net gain condition'. Both Paragraphs 001 and 002 are clear that the biodiversity net gain condition is a pre-commencement condition that requires the submission of a Biodiversity Gain Plan, and the 10% requirement can be provided onsite, offsite, or through the use of statutory credits.
- 10.33 Whilst the PPG is clear that the requirements of net gain cannot be established until the detailed application stage, the guidance also requires some consideration of net gain at the application stage. The level of information required isn't set in stone, but from review of the at an outline application stage, the key element to be considered is setting the baseline habitat value of the site and providing the council with adequate comfort that the 10% net gain requirement can be met.
- 10.34 Paragraph 011 sets the minimum level of information that should be submitted with an application. From the submissions during the planning application, it is clear that this minimum requirement has been met.
- 10.35 Where additional information is requested at the application stage, the PPG is clear that the local authorities should take a proportionate approach. Of relevance to this appeal is the information relating to the balance of the on-site and off-site provisions.
- 10.36 Given the outline status of the application and the simple direction of the PPG that the detail of net gain is a matter that will be resolved at the detailed application stage, it is difficult to understand the logic of applying to refuse the planning application based on insufficient information relating to biodiversity net gain.
- 10.37 The comments from the ecology officer do provide some additional information relating to this RfR. From the review, the themes supporting this RfR, simply comprise two matters:
- 1 - the officer disagreed with some of the post-development value in the metric.
 - 2 - the officer requested further details of the source for the off-site biodiversity units.
- 10.38 The following addresses these matters in turn.
- 1 - Post-development Value used in the Metric**
- 10.39 A revised and updated Statutory Metric assessment has been prepared and submitted to the LA. As with previous submissions, the assessment confirms that the minimum objective of a 10% gain is achieved in habitat, hedgerow, and watercourse units, and all trading rules are satisfied.
- 10.40 Since the submission of the original Statutory Metric, there have been two key changes to the baseline conditions and the mitigation applied within the scheme. One is the identification lowland meadow within the baseline and the inclusion of lowland meadow translocation in the

post development proposals. The second is the designation of woodland W1 as an Ancient Woodland.

- 10.41 In terms of the lowland meadow slightly increases the baseline value of the Site. However, through translocation and long-term management, the scheme results in an overall net gain on-site for this receptor. In relation to this receptor, the scheme goes further, and additional lowland meadow units have been secured at the Moreton Park Habitat Bank. This additional provision does provide a significant gain to this receptor in the local area.
- 10.42 The identification of Ancient Woodland makes no difference to the baseline habitat value, but the habitat has now been identified as an irreplaceable habitat in the metric. As the woodland is retained and buffered this alteration make no material difference to the biodiversity net gain assessment.
- 10.43 As discussed in Paragraph 8.12, the revised metric has adopted the local authorities' recommendations, reducing the 'distinctiveness' target for grassland enhancements in the eastern and central areas, and reducing condition immediately adjacent to major footpaths. In the larger homogeneous areas of grassland, where the influence of the informal recreational pressure will be reduced, the condition target has been maintained as good, albeit at a lower distinctiveness proposed habitat type. Whilst this follows the original submission, it is my view that these larger areas of grassland can achieve the five requisite condition criteria to achieve good quality other neutral grassland through enhancements and long-term management. Clarification of such matters is outlined in the Updated Biodiversity Net Assessment dated November 2025.
- 10.44 Accepting this slight change in the Statutory Metric, further off-site biodiversity compensation above and beyond those previously identified are necessary to demonstrate that the biodiversity objective is achieved. Here, the appellant has secured the relevant other neutral grassland habitat units, to achieve the basic 10% net gain requirement. For the scheme, the proposals have sought to over-provide other neutral grassland units by appropriately 5.2%, and these units will be provided in the Moreton Park Habitat Bank.
- 10.45 In simple terms, the Site will provide 111.16 habitat units, this results in the loss of 34.35 habitat units, equivalent of a 23.61% loss in Biodiversity value. In addition to the habitat units onsite, the scheme has secured an additional 10.02 lowland meadow units and 42.02 other neutral grassland units. With the inclusion of these offsite units the scheme as a whole provides a net gain of 12.15%, exceeding the minimum requirements of the biodiversity objective.
- 10.46 Given the amendment to the values, it is my view that the minor issues raised by the council have been fully addressed.

2 – Sourcing the off-site net gain units.

- 10.47 In simple terms, the appellant has sourced all of the relevant habitat units from the Moreton Park Habitat Bank. This habitat bank has secured and registered habitat units for lowland meadow and other neutral grassland. The appellant has paid the relevant deposit to secure use of these habitat units.

Biodiversity Net Gain – General Matters

- 10.48 In addition to the clarification of matters raised by the Local Authority, the following provides further consideration of Paragraph 008 'the biodiversity net gain hierarchy'. Paragraphs 10.15 –

10.18 consider matters relating to the mitigation hierarchy outline at Paragraph 193(a) of the NPPF.

- 10.49 In simple terms, there are two elements to the net gain mitigation hierarchy, and the following provides an assessment of these elements.
- 10.50 The first element of the hierarchy recommends that developments 'should' avoid adverse effects to habitats of medium, high and very high distinctiveness habitats but it does allow the application of mitigation where such effects cannot be avoided.
- 10.51 From the submitted assessment, it is clear that whilst the proposals have sought to avoid effects to very high distinctiveness and medium distinctiveness habitats, some effects the these habitat types will occur.
- 10.52 As set out in my evidence, the management required to secure the long-term protection of these is not currently being applied. Thus, without the security and intervention development can bring the longevity of these habitats on site is questionable. Given this, the proposals provide mitigation for the very high distinctiveness habitat (lowland meadow) within the site, and the proposals have avoided areas of the higher value other neutral grassland and provided mitigation for these habitats within the site has been maximised. This mitigation package has been designed to reduce the potential effects of the scheme. In my view, this approach does follow the overall requirements, and onsite mitigation has been provided to minimise the effects on these habitats.
- 10.53 The second element of the net gain hierarchy requires compensation to be provided in the order of enhancement / habitat creation on site, allocation of offsite gain and finally the use of statutory credits. The appeal proposals do provide on-site habitat creation / enhancement and the residual effects have been secured on an off-site registered habitat bank. Given this, it is my opinion that the appeal proposals do follow the order of provision set out in the hierarchy.
- 10.54 In summary, it is my view that the updated biodiversity net gain assessment has demonstrated that following the implementation of the mitigation / compensation, the proposals do not result in adverse effects to biodiversity rather, the qualitative assessment confirms a net gain to biodiversity will be provided.

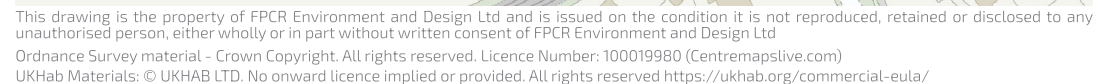
11.0 SUMMARY & CONCLUSIONS

- 11.1 Prior to submission of the planning application, the appeal site was subject to ecological survey work, but given the seasonal nature of ecological surveys, the ecological survey was on going over the determination period. Following the refusal of the planning application in June 2025, all of the relevant ecological survey work was completed and the results of this survey work has been presented my evidence and the technical appendices.
- 11.2 As outlined in my evidence, the Site has not been designated through any statutory or non-statutory mechanisms. Since the submission of the planning application, the area of woodland (W1) to the northeast of the site has been designated on MAGIC as an Ancient Woodland (AW). Whilst, this AW classification would meet the requirement to be classified as a Biological Heritage Site (BHS), the woodland is not formally designated under the BHS system. Regardless of this updated designation, the AW and the veteran tree in the AW are retained and an appropriate buffer zone has been applied.

- 11.3 In addition to the AW and the veteran tree, the completed surveys a number of habitats of ecological importance have been identified. These include:
- The area of lowland mix deciduous woodland,
 - The small area of lowland meadow,
 - Areas of other neutral grassland,
 - The watercourse, and
 - Hedgerow and mature trees.
- 11.4 Of these, the lowland mixed deciduous woodland, the lowland meadow and the hedgerows have been identified as priority habitats as defined in S41 of the NERC Act and local BAP habitats. None of these habitats have been assessed as meeting the selection criteria to be designated as a BHS. In addition, none of these habitats are identified as irreplaceable habitat either in the NPPF or the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.
- 11.5 The appeal proposals have been designed to minimise potential effects to the watercourse, woodland and hedgerow habitat recorded within the Site. Whilst some mitigation for all of these features are required, the completed net gain assessment confirms there is no net loss of these habitat features and a 10% net gain has been demonstrated for watercourse and hedgerows.
- 11.6 The area of lowland meadow identified within the Site was recorded as being in poor condition as the indicator species were only recorded occasionally through the sward and the recorded area only forms a very minor proportion of the regional resource. In addition, the survey information confirms the grassland is not managed in a manner which will maintain the habitat type in the long term.
- 11.7 Whilst retaining the habitat in situ is desirable, the completed survey work indicates in the medium-term quality of the grassland would be lost, a similar situation to that assessed at the Drake Broughton appeal. In my view, translocation of the grassland lowland meadow within the site to avoid damage and fragmentation through the implementation of the site infrastructure, is an acceptable form of mitigation for a habitat that is likely to be lost through lack of appropriate management. Through translocation and a commitment to long term management, the quantitative assessment using the Statutory Metric confirms the proposals will result in a 'no net lost' to this habitat type. The use of grassland translocation has been found to be an acceptable form of mitigation on other appeal schemes and grassland translocation has been shown to be effective through grassland translocation exercises completed as part of the HS2 project.
- 11.8 From a policy perspective, DME3 indicates that affecting a priority habitat could cause conflict. However, this potential policy conflict needs to be balanced with the inevitable consequence that a lack of management is likely to result in the loss of the grassland, the onsite proposals can achieve 'no net loss' for lowland meadow and the fact Key Statement ENV4 allows the use of biodiversity offsetting for habitats, non-statutory designated habitats. When taken in the round and considering the appellant has sourced lowland meadow credits offsite. These units provide a 113% gain in this habitat type which more than adequately compensates any residual effects and make the proposals acceptable from an ecological perspective.

- 11.9 The completed botanical assessment has identified areas of other neutral grassland in moderate and good condition across the site. This particular habitat type is not listed as a priority habitat or a local BAP habitat, but the completed surveys indicate the quality of this habitat is declining though lack of management.
- 11.10 The proposed scheme has sought to retain areas of good and moderate other neutral grassland within the scheme and these areas will be the subject of a long-term management plan. This will secure the quality of the grassland in the long term. Given the nature of the grassland and how the metric assesses loss of this habitat type, the quantitative assessment using the Statutory Metric demonstrates that without further compensation, the proposals will result in a net loss to biodiversity. In similar terms and following the requirement of ENV4 the appellant has sourced the necessary other neutral grassland units to fully mitigate this loss and provide a 5.2% increase in this habitat type locally. Through the application of this mitigation and compensation it is my view that the proposals are acceptable.
- 11.11 In addition to the botanical assessment, the updated survey work provided the results of additional protected species survey. In simple terms, these surveys did not identify any statutory ecological constraint to development of the appeal site or significant ecological constraint which could not fully mitigated within the scheme.
- 11.12 From the assessment presented above, it is my opinion the matters relating to RfR4 are resolved.
- 11.13 RfR5 related to matters associated with biodiversity net gain. This RfR is twofold, firstly the council disagreed with some the targeted distinctiveness values and secondly the council wanted clarification on the proposed location of the offsite biodiversity units (or clarification of the scheme as required by ENV4).
- 11.14 To narrow matters between the main parties, this work has considered the council's comments during the application process and the targeted distinctiveness values have been amended. This amendment did require the use of additional of site credits which has been accepted by the appellant. In relation to the location of the habitat bank, the appellant has scored all of the required and additional units at the Moreton Park Habitat Bank.
- 11.15 Through these onsite and offsite provisions, the updated metric submitted to this appeal confirms a net gain in habitat units equivalent to 12.15%. In terms of hedgerows, the scheme provides a net gain of 24.37% and an uplift of 13.3% in watercourse units.
- 11.16 From this assessment above, it is my professional opinion that the proposals will not result in harm to biodiversity; rather, the proposals will lead to a net gain to biodiversity, which is in accordance with both the requirements of the NPPF, local planning policy, and Part 6 of the Environment Act, and matters raised in RfR5 have been resolved.
- 11.17 Overall, the proposals will secure a range of positive benefits to biodiversity for both habitats and species. In my opinion, the key benefits to biodiversity are:
- 1 - the translocation of the majority of the lowland meadow (0.7954ha) within the site and the long-term sensitive management of the translocated grassland,
 - 2- the retention / enhancement and long term management of 4.0603ha of good and medium condition other neutral grassland,

- 3 – the protection and enhancement of the ancient woodland and the veteran tree identified in the site, and
 - 4 – the creation of an additional 1.525ha of lowland meadow and 10ha of other natural grassland in a strategic level habitat bank within 4km of the appeal site.
- 11.18 Through the implementation of the key measure outline above the proposals will protect ecological assets and provide a net increase in the quantum of lowland meadow and species rich grassland with the context of the Ribble Valley.
- 11.19 In summary, the proposals will not result in the loss or deterioration of irreplaceable habitats as defined in the NPPF and the proposals apply appropriate and proportionate mitigation and compensation for the loss of habitats within the site to ensure development would not result in more than low level harm to ecological receptors. Net gains to biodiversity can be delivered by the development through a combination of habitat enhancement and creation within the Site, and further offsite enhancements. These net gains include a significant uplift for the priority habitat lowland meadow. Therefore, from the submitted information and the evidence presented here, it is concluded that the development proposals are in accordance with National and Local Plan policies, the rules and principles of the DEFRA metric and the requirements of the PPG.



APPENDIX 5:

AFFORDABLE HOUSING PROOF OF EVIDENCE

Affordable Housing Proof of Evidence of James Stacey BA (Hons) Dip TP MRTPI

Land at Longsight Road, Langho

Affordable Housing Proof of Evidence of James Stacey BA (Hons) Dip TP MRTPI

Outline planning application for up to 300 residential dwellings, associated access, rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access to, but not within, the site).

Land at Longsight Road, Langho

Hallam Land Management Limited

December 2025

OUR REF: M25/0708-01.RPT

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Appendices

Appendix JS1	Freedom of Information Correspondence (21 November 2025)
Appendix JS2	Extracts from Planning Practice Guidance (March 2014, Ongoing Updates)
Appendix JS3	Appeal Decision: Land at Sondes Place Farm (November, 2023)
Appendix JS4	Appeal Decision: Land to the West of Langton Road, Norton (July 2016)
Appendix JS5	Appeal Decision: Coombebury Cottage, Dunsfold (May 2024)

Introduction

Section 1

1.1 This Affordable Housing Proof of Evidence has been prepared by James Stacey BA (Hons) Dip TP MRTPI of **Tetlow King Planning** (“TKP”) on behalf of **Hallam Land Management Limited**. It examines the need for affordable housing in the Ribble Valley Borough Council administrative area (where the appeal site is located), as well as the local need for affordable housing in Langho.

1.1 My credentials as an expert witness are summarised as follows:

- I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England (“UWE”) (1997). I am a member of the Royal Town Planning Institute (“RTPI”).
- I have over 30 years professional experience in the field of town planning and housing. I was first employed by two local authorities in the south west and been in private practice since 2001.
- During career I have presented evidence at more than 170 section 78 appeal inquiries and hearings. I act for cross-section of clients and advise upon a diverse range of planning housing related matters.
- In December 2022 I was appointed as Managing Director of Tetlow King Planning. Prior to this I held the position of Senior Director. I was first employed by Tetlow King Planning in 2009.
- Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging development plan documents and supplementary planning documents on affordable housing throughout the UK.

- 1.2 In accordance with the Planning Inspectorate's Procedural Guidance, I hereby declare that:

"The evidence which I have prepared and provide for this appeal in this proof of Evidence is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."

- 1.3 I further confirm that no part of this evidence has been assisted by the use of Artificial Intelligence (AI).
- 1.4 Outline planning permission is sought for up to 300 residential dwellings, of which 30% are proposed as affordable homes equivalent to up to 90 affordable. This level of provision meets the requirements of Policy H3 of the Core Strategy (2014).
- 1.5 The proposed affordable housing will be secured by way of a Section 106 planning obligation, with the tenure split of the development to be agreed with the Council at this later stage.
- 1.6 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government.
- 1.7 This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), and recent Written Ministerial Statements which acknowledge the need to address an *"acute and entrenched housing crisis"*.
- 1.8 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.9 My Proof of Evidence considers the need for affordable housing and the contribution that the proposed development can make towards meeting the affordable housing needs of the Ribble Valley Borough Council administrative area and of Brockhall & Dinckley Ward and Billington & Langho Ward, and MSOA¹ Ribble Valley 007 'Whalley & Brockhall' where the appeal site lies.
- 1.10 It also takes account of a range of affordable housing indicators as well as consideration of national planning policy, performance against plan requirements, affordability issues, and the Council's own corporate objectives.

¹ Middle layer Super Output Areas, or MSOAs, are statistical areas that are used for the reporting of local-level statistics such as house prices and Census data.

- 1.11 I conclude that there is a genuine and acute need for the proposed affordable homes now, and that **substantial² positive weight** should be attributed to the provision of affordable housing at the appeal site in the planning balance.
- 1.12 In undertaking this work, I place reliance upon data obtained through a Freedom of Information (“FOI”) request to the Council which is included at **Appendix JS1** to this Proof of Evidence.
- 1.13 My Proof of Evidence comprises the following eight sections:
- Section 2 establishes the importance of affordable housing as an important material consideration;
 - Section 3 considers the consequences of failing to meet affordable housing needs;
 - Section 4 reviews relevant Development Plan policies and other material considerations relevant to the site;
 - Section 5 provides analysis of affordable housing needs;
 - Section 6 examines past affordable housing delivery;
 - Section 7 identifies a range of affordability indicators;
 - Section 8 identifies the benefits of the proposed affordable housing at the appeal site; and
 - Section 9 sets out our conclusions and recommendations.

² For clarity, the weightings applied are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

- 2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent iterations of national planning policy, including the National Planning Policy Framework ("NPPF").

National Planning Policy Framework (12 December 2024)

- 2.2 The NPPF was most recently updated on 12 December 2024 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-taking processes.
- 2.3 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 8(b) is 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."* (Emphasis added).
- 2.4 At the heart of the NPPF is the presumption in favour of sustainable development contained at paragraph 11. Under paragraph 11c, proposals which accord with an up-to-date development plan should be approved without delay. Under paragraph 11d, where the most important policies are out of date, permission should be granted unless the policies in the NPPF provide a strong reason for refusal, or where any adverse impacts of the scheme significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole.
- 2.5 The December 2024 revisions to the NPPF expand the decision-taker's assessment under paragraph 11d to have *"particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination"* (my emphasis). In doing so, the **NPPF now makes affordable housing a central part of**

applying the presumption to which the decision-taker must have particular regard.

- 2.6 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:

“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed [...] The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.” (Emphasis added).

- 2.7 It should be stressed that paragraph 61 identifies the ‘overall aim’ as to meet an area’s identified housing need. Paragraph 62 clarifies that *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.”*
- 2.8 The NPPF places a core responsibility on all major developments (involving the provision of housing) to provide affordable housing. In particular, paragraph 66 establishes that *“where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.”*
- 2.9 Affordable housing is defined within the glossary of the NPPF (Annex 2) as *“housing for sale or rent, for those whose needs are not met by the market [...] and which complies within one or more of the following definitions”* before identifying four categories of affordable housing: Social Rent in accordance with Government’s conditions and requirements, other affordable housing for rent which is at least 20% below market value, discounted market sales housing which is at least 20% below market value, other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

“Building the Homes We Need” Written Ministerial Statement (30 July 2024)

- 2.10 On 30 July 2024, the Secretary of State, Angela Rayner MP, delivered a Written Ministerial Statement (“WMS”) indicating the ‘direction of travel’ for the new Government’s intentions for national planning policy.

- 2.11 The WMS set out the Government's aspirations to drive the delivery of affordable homes, stating that *"the Government are committed to the biggest growth in social and affordable housebuilding in a generation"* and setting an objective to deliver 1.5 million homes during the current Parliament.

"Building the Homes We Need" Written Ministerial Statement (12 December 2024)

- 2.12 In a further WMS accompanying the publication of the revised NPPF, the Housing and Planning Minister, Matthew Pennycook MP, referred again to the Government's objective to deliver 1.5 million homes during the current Parliament and made a series of stark observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward:

"This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters' income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade." (my emphasis)

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.13 The Planning Practice Guidance ("PPG") was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document's application. **Appendix JS2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

- 2.14 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority of successive Governments. It is a fundamental element in the drive to address and resolve the national housing crisis. That it has been part of Government policy for so long is indicative of the length of time over which there has been a deficiency in supply in the national housing market.

Consequences of Failing to Meet Affordable Housing Needs

Section 3

Introduction

- 3.1 The National Housing Strategy³ sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply. Despite the debate taking place over a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Ribble Valley.
- 3.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:
- “I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”*
- 3.4 When asked to clarify the word “*crisis*” by the MP for Tewkesbury, Nick Boles, commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis “*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*”.

³ Laying the Foundations: A Housing Strategy for England (November 2011)

3.5 In response to questions, Nick Boles reaffirmed that:

“Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.

3.6 He went on to say: *“It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them.”*

3.7 Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.

3.8 Mr Boles indicates that there are *“a lot of statistics to prove it”*. My evidence in subsequent sections sets out an array of statistics, which I consider demonstrates that the crisis remains as prominent now as it did in 2013.

3.9 Moving forward over a decade and a new Government, we see even more alarming comments from the Housing Minister, Matthew Pennycook. On 20 November 2024, the Minister addressed the Housing, Communities and Local Government Committee: He began with a powerful reminder:

“We have a generation now completely locked out of home ownership as a result of the steadily expanding gap between average house prices and average earnings. We have millions of low to middle-income households forced into insecure, unaffordable and far too often substandard private rented housing. We have 1.3 million people languishing on social housing waiting lists. To our utter shame as a nation—I say this everywhere I go—more than 150,000 homeless children right now are living in temporary accommodation. That is the price we have paid for not being serious about house building rates.”

3.10 He went on to say:

It is not just the lives it blights; it is also the impact on our economy. We are all suffering. The public services we rely on, for example, are harmed by the fact that we are consuming ever larger amounts of public money in the form of the rapidly rising housing benefit bill. The situation that we are in also hampers economic growth and productivity. It constrains the ability of our great towns and cities to realise their full potential. We are taking decisive action to tackle the housing crisis and boost economic growth.

Consequences of Failing to Meet Affordable Housing Need

- 3.11 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.
- 3.12 In August 2019 the Children's Commissioner produced a report titled "*Bleak Houses: Tackling the Crisis of Family Homelessness in England*" to investigate the impact of homelessness and in particular the effect of this upon children.
- 3.13 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms⁴.
- 3.14 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.
- 3.15 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that "*Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work*".
- 3.16 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and have no choice but to move out of their local area, which can have a "*deeply disruptive impact on family life*". This can include lack of support (from grandparents for example) and travel costs.

⁴ The Children's Commissioner Report references a National Audit Office Report titled 'Homelessness' (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

- 3.17 It found that a child's education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children's educational development can also be delayed.
- 3.18 Temporary accommodation also presents serious risks to children's health, wellbeing, and safety. This is particularly so for families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 3.19 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a "*significant impact on many aspects of their lives*".
- 3.20 More recently, in May 2021, Shelter published its report "*Denied the Right to a Safe Home – Exposing the Housing Emergency*" which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that affordability of housing is the main cause of homelessness (page 15) and that "*we will only end the housing emergency by building affordable, good quality social homes*" (page 10).
- 3.21 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

"Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it's damp, cramped, or away from jobs and support networks." (Page 5)

"... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option." (Page 5)

The high cost of housing means the private-rented sector has doubled in size over the last 20 years. [...] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability. (Page 6)

If you live in an overcrowded home, you're more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer. (Page 9)

"14% of people say they've had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding" (Page 12)

"Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%)." (Page 14)

"19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future." (Page 15)

"Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It's unsettling, destabilising, and demoralising. It's common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are 'often unhappy or depressed', anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn." (Page 25)

"Landlords and letting agents frequently advertise properties as 'No DSS', meaning they won't let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people." (Page 29)

"The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing." (Page 30)

- 3.22 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (Page 32).
- 3.23 The Report concludes (page 33) that for change to happen, *"we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there's only one way to end the housing emergency. **Build more social housing**"* (emphasis in original).

- 3.24 In April 2022 Shelter published a further report titled *“Unlocking Social Housing: How to fix the rules that are holding back building”*. The first paragraph of the Executive Summary is clear that:

“Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings. Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food.”

- 3.25 The Executive Summary goes on to state that **“An affordable and secure home is a fundamental human need”** (emphasis in original) noting that one in three of us don’t have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.

- 3.26 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 – s106) and replace it with a flat tax called the ‘infrastructure levy’. It states that:

“This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. The unintended consequence could add yet more barriers to social housebuilding and spell the end of mixed developments where social tenants live alongside private owners.” (My emphasis).

- 3.27 In considering the impact of the PRS the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – *“That’s taxpayer money subsidising private landlords providing insecure and often poor-quality homes.”* The paragraph goes on to note that:

“The lack of social housing has not just pushed homeownership out of reach, it’s made it nearly impossible for working families to lead healthy lives and keep stable jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home.”

- 3.28 Regarding the temporary accommodation (“TA”) the report notes on page 10 that number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has gone through the roof. The page also notes that *“TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies.”*

- 3.29 Page 11 goes on to highlight that *“Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the local authority area they previously lived in.”* This means that *“Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks.”*
- 3.30 The page goes on to conclude that *“As a result, the national housing benefit bill has grown. Tenants' incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security. **There are now more private renters claiming housing benefit than ever before.**”* (emphasis in original).
- 3.31 Page 9 is also clear that *“Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters' housing benefit simply doesn't meet the cost of paying the rent.”*
- 3.32 In considering the consequences of this page 12 notes that *“With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution and homelessness.”*
- 3.33 Finally, page 21 is clear that:
- “For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. Access to good housing affects every aspect of one's life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory, but also contributes to the threads of society by helping people contribute to their communities.*
- The evidence is clear, the financial requirements to own one's home are out of reach for many. And many will spend years stuck in a private rented sector that's not fit for purpose. The answer is clear: build many more, good quality social homes for the communities that so desperately need them.”* (My emphasis).

- 3.34 The consequences of failing to provide enough affordable homes were also recognised by the Inspector in a recent decision in Mole Valley where I provided affordable housing evidence. Inspector McGlone (**Appendix JS3**) was clear at paragraph 88 of his decision that:

“The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development. In Mole Valley the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.”

- 3.35 It is also pertinent to highlight that Ribble Valley themselves recognise the consequences of failing to meet affordable housing needs.

The Cost of Living Crisis

- 3.36 On 8 March 2024, the House of Commons published its ‘Rising Cost of living in the UK’ briefing report⁵ which highlights the affordability of goods and services for households.
- 3.37 The briefing report details at Section 5.1 that *“47% of adults in Great Britain reported an increase in their cost of living in February 2024 compared to a month ago.”* Moreover, Section 5.1 further specifies that *“64% of those who reported a rise in the cost of living between 14 and 25 February 2024 said they are spending less on non-essentials as a result, while 45% reported using less energy at home and 40% report cutting back on essentials like food shopping. 3% were being supported by a charity, including food banks.”*
- 3.38 Additionally, page 45 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits.
- 3.39 Shelter published a briefing report in September 2022 titled ‘Briefing: Cost of Living Crisis and the Housing Emergency’ which further explains the private rented sector problem on page one:

“LHA which determines the amount of housing benefit private renters receive has been frozen since March 2020 while private rents have risen 5% in England – and even more in some parts of the country. The freeze has left low-income private

⁵ Source: <https://commonslibrary.parliament.uk/research-briefings/cbp-9428/>

renters in an incredibly precarious position. 54% of private renters claiming housing benefit have a shortfall to their rent." (My emphasis).

- 3.40 The Shelter briefing sets out that low-income households (including those at risk of homelessness) have no choice but to turn to the private rented sector due to a severe shortage of affordable housing, and concludes on page two that *"the only sustainable solution is to address the causes of the housing emergency by investing in truly affordable social homes"*.

The Cost of Temporary Accommodation

- 3.41 In my opinion the cost of temporary accommodation is an important material consideration in the determination of this appeal.
- 3.42 BBC News reported on 13 October 2023 that English Councils spent more than £1.7bn on temporary accommodation for homeless people in the 2022/23 financial year. In my opinion this is a significant cost arising primarily as a consequence of a lack of affordable housing to adequately house people in need.
- 3.43 The article highlighted that the figure, published by the Ministry of Housing, Communities and Local Government ("MHCLG"), has increased by around 9% from the previous year. B&B accommodation alone in 2022/23 accounted for almost £500m in gross costs, increasing by a third on the previous year.
- 3.44 Shelter's chief executive Polly Neate was quoted in the article, stating that the amount spent on temporary accommodation was not only *"outrageous, but it's also illogical"*. She went on to say that:

"We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home. [...]"

This decision combined with the decades of failure to build enough social homes has meant that families can't find anywhere affordable to live and as a result are forced into homelessness in cramped and unsuitable temporary accommodation, often miles away from their children's schools and support networks." (Emphasis added)

- 3.45 Inside Housing reported in October 2023 that homelessness in England is continuing to increase, with figures published in July 2023 showing the number of people in temporary accommodation was at a record high and that the number of children in this situation is also at the highest level since records began in 2004.

- 3.46 On the 5 March 2024 MHCLG published data on the age of children under ten in temporary accommodation. The study found that there were 86,945 children under the age of ten living in temporary accommodation at the 30 June 2023, with 19,430 of these children less than 12 months old.
- 3.47 The Inside Housing article also highlighted that the growing cost of temporary accommodation is putting local authorities' budgets under strain. It noted that that Hastings Borough Council recently faced bankruptcy, partly due to its large expenditure on temporary accommodation, which had risen to £5.6m per year, compared with £730,000 in 2019.
- 3.48 The report added that London councils are expected to overspend on temporary accommodation by £90m this year.
- 3.49 In December 2023, ITV News reported that almost one in five council leaders in England expect to issue Section 114 notices⁶ in 2024.
- 3.50 On the 23 January 2024, ITV News reported that the increasing cost of housing homeless people in temporary accommodation is putting local authorities on the brink of financial ruin.
- 3.51 The ITV News article added that according to homelessness charity Crisis, some 298,430 households approached their local council for homelessness support in the past year. Jasmine Basran, head of policy and campaigns at Crisis, said:
- "Crippling financial pressures from rising living costs, unaffordable rents and a severe lack of social homes is forcing more and more people into homelessness."*
(Emphasis added)
- 3.52 The ITV News article continued, adding that Eastbourne Borough Council ("EBC") is currently spending 49p of every £1 on temporary accommodation for homeless people. Stephen Holt, the leader of EBC said ministers must "recognise the gravity of this situation" and work out how to resolve it "before it is too late", adding that:
- "Simply put, without government intervention to tackle the tremendous cost of temporary accommodation and homelessness, the next step for many councils of all stripes is emergency budgets and section 114 notices."*

⁶ A section 114 notice means the council cannot make new spending commitments and must meet within 21 days to discuss what to do next.

- 3.53 A further article from Inside Housing on 24 January 2024 reported that the surge in spending on temporary accommodation could spell the “end of local government”.
- 3.54 The article highlighted that Councillors from across the political spectrum had expressed serious concerns over temporary accommodation spending at an emergency meeting in Westminster on 23 January 2024 where more than 50 local leaders met to discuss the “national crisis” caused by the cost of temporary accommodation.
- 3.55 I agree that the cost of housing people in affordable housing is spiralling out of control. I also agree with Polly Neate that, *“We simply can’t keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home.”*

Summary and Conclusions

- 3.56 Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:
- A lack of financial security and stability;
 - Poor impacts on physical and mental health;
 - Decreased social mobility;
 - Negative impacts on children’s education and development;
 - Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour or those with substance abuse issues;
 - Being housed outside social support networks;
 - Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
 - An increasing national housing benefit bill.
- 3.57 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.
- 3.58 I am strongly of the opinion that a step change in the delivery of affordable housing is needed now.

- 3.59 The acute level of affordable housing need in Ribble Valley coupled with worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

The Development Plan and Related Policies

Section 4

Introduction

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the appeal should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The relevant Development Plan in respect of affordable housing for the appeal site currently comprises the Ribble Valley Core Strategy (adopted 2014) and the Housing and Economic Development – Development Plan Document (adopted 2019).
- 4.3 Other material considerations relevant to affordable housing include the NPPF (2024) and the PPG (March 2014, ongoing updates), the emerging Ribble Valley Local Plan (2021-2038), and a number of corporate documents which support the provision of affordable housing at the corporate level.

The Development Plan

Ribble Valley Core Strategy 2008 to 2028 (adopted 2014)

- 4.4 The Ribble Valley Core Strategy was adopted in December 2014 and covers the 20-year plan period between 2008 and 2028. Paragraph 3.12 of the Core Strategy outlines the strategic objective to “*increase the supply of affordable and decent homes in the borough to help meet identified needs*”.
- 4.5 **Key Statement H3 (Affordable Housing)** at page 58 of the Core Strategy is the Council’s main affordable housing policy. The policy outlines that within the settlement boundaries of Clitheroe and Longridge, on housing developments of 10 units or more dwellings (or sites of 0.5 hectares or more, irrespective of the number of dwellings) an element of affordable, local needs housing will be required on all schemes. The policy adds that the Council will seek affordable housing provision at 30% of units on the site.
- 4.6 Policy H3 states that in all other location in the Borough, on developments of 5 or more dwellings (or sites of 0.2 hectares or more irrespective of the number of dwellings) **the council will require 30% affordable units on the site.**

- 4.7 The policy adds that the Council will only consider a reduction in this level of provision, to a minimum of 20% only where supporting evidence, including a viability appraisal fully justifies a lower level of provision to the council's satisfaction.
- 4.8 Policy H3 states that providing housing for older people is a priority for the Council within the Housing Strategy. The policy adds that within the negotiations for housing developments, 15% of the units will be sought to provide for older people on sites of 10 units or more. Within this 15% figure a minimum of 50% would be affordable and be included within the overall affordable housing threshold of 30%. The remaining 50% (ie the remaining 50% of the 15% older people's element) will be for market housing for older people.
- 4.9 Policy H3 outlines that all affordable housing provided must be made available to those in housing need and will remain affordable in perpetuity.
- 4.10 The Policy adds that developers will be expected to provide affordable housing on site as part of the proposed development unless Ribble Valley Borough Council and the developer both agree that it is preferable to make a financial or other contribution towards the delivery of affordable housing on another site.

Housing and Economic Development DPD 2008 to 2028 (adopted 2019)

- 4.11 The Housing and Economic Development - Development Plan Document ("HED DPD") was adopted in October 2019 and sets out more detailed policy coverage for matters relating to housing and economy.
- 4.12 Key Statement **DS1 (Development Strategy)** outlines on page 5 that the majority of new housing development will be
- *"concentrated within an identified strategic site located to the south of Clitheroe towards the A59; and*
 - *the principal settlements of: Clitheroe; Longridge; and Whalley."*
- 4.13 Policy DS1 adds that *"In addition to the strategic site at Standen and the borough's principal settlements, development will be focused towards the Tier 1 Villages, which are the more sustainable of the 32 defined settlements"*. The settlement of Langho, where the appeal site lies, is listed as one of these defined settlements.

Other material considerations

Emerging Ribble Valley Plan 2021-2038

4.14 The Council consulted on the Regulation 18 draft Local Plan from 26 May 2022 to 7 July 2022. The Ribble Valley Local Development Scheme (LDS) published in March 2025 outlines the following timetable for producing the new Local Plan:

- *Second Regulation 18 Consultation - Autumn 2025*
- *Consultation on draft plan (Regulation 19) - January 2026*
- *Publication of Proposed Submission Documents - March 2026*
- *Submission - May 2026*
- *Examination in Public* 2026*
- *Adoption* December 2026*

**subject to Planning Inspectorate timetable*

4.15 Page 21 of the draft Local Plan document outlines that the local plan should *“increase the supply of affordable and decent homes in the borough to help meet identified needs in a sustainable manner”*.

4.16 Chapter 4.3 ‘Affordable Housing’ sets out on page 30 the emerging Local Plan’s key issues/aims for affordable housing. Paragraph 4.3.1 states that *“Affordability is a key issue within Ribble Valley as an area with very high housing values that continues to place pressure on many residents’ ability to access housing. The Council has pursued as a corporate objective a desire to try and re-balance the housing market by seeking to match needs with supply. This of course continues to be a challenge and the lack of truly affordable housing has an impact upon people being able to remain in their local area, live close to where they work or return to support older family members”*.

4.17 Paragraph 4.3.2 goes on to say: *“There are also ongoing issues around the availability of the right affordable stock to address people’s needs as well as tenures that people can afford with a well reported shortfall in affordable rented accommodation. The SHMA report sets out detail of key issues in relation to affordable housing and provides for the area, based on national guidance, an assessment of need for affordable housing”*.

- 4.18 Furthermore, paragraph 4.2.4 outlines that: *“The most recent SHENA calculates a need for affordable housing of some 88 dwellings annually. This is important in considering the housing requirement overall as the main mechanism for delivery relies on new house building”.*

Ribble Valley Borough Council Corporate Plan 2023-2027

- 4.19 The Ribble Valley Borough Council Corporate Plan 2023-2027 sets out the direction of the Council over the set period, ensuring that the needs of the communities are met.
- 4.20 Page 16 of the Plan outlines that Ribble Valley will *“Deliver good quality, affordable and sustainable housing that meets the needs of our communities”.*
- 4.21 Page 17 of the Plan adds that the Council will measure success by monitoring performance in respect of *“Meeting the housing needs of all sections of the community”.*

Ribble Valley Borough Council Homelessness Strategy 2022-2025

- 4.22 The Ribble Valley Borough Council Homelessness Strategy 2022-2025 sets out the Council's vision and objectives for services for homelessness people.
- 4.23 Page 2 of the Strategy outlines the Council's Vision and Objectives, stating:
- “through partnership working with all stakeholders the Council's strategy sets out to prevent homelessness, provide effective support for households who are or may become homeless and make available sufficient affordable accommodation within the borough.”* (Emphasis added).
- 4.24 Page 6 of the Strategy also states that *“The availability of affordable housing is one of the most important needs for families and communities in the Ribble Valley”.* It adds *“Developing affordable housing is a corporate ambition of the Council to meet the identified ‘housing need’”.*
- 4.25 On page 6 of the Strategy it outlines that *“addressing affordability is a key factor in providing the homelessness service”.*
- 4.26 The impacts of affordability is discussed further at page 16, with the Strategy adding that it *“has a massive impact on all aspects of the homelessness service and is at the root of all obstacles in homelessness prevention. Affordability has always been a key barrier in Ribble Valley”.*

4.27 Whilst Page 20 the Strategy highlights that *“Although affordability has theoretically improved since the start of the economic downturn, there remains a large proportion of households in Ribble Valley that are unable to afford to buy”*.

4.28 Overall, it can be seen that addressing the availability of affordable homes is a key issue for the Council.

Conclusions on the Development Plan and Related Policies

4.29 The relevant Development Plan in respect of affordable housing for Ribble Valley currently comprises the Ribble Valley Core Strategy (2014), and the HED DPD (2019).

4.30 The evidence set out in this section clearly highlights that within adopted policy, the emerging Ribble Valley Local Plan and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within Ribble Valley.

4.31 The appeal proposals provide an affordable housing contribution which meets the requirements of the Core Strategy, Policy H3.

4.32 The up to 90 affordable homes at the appeal site will make a significant contribution towards the annual affordable housing needs of the Borough, particularly when viewed in the context of past rates of affordable housing delivery which I consider in more detail in Section 6 of this proof of Evidence.

Affordable Housing Needs

Section 5

Introduction

- 5.1 In this section I explore the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across the Borough.

The Development Plan

- 5.2 The 'Housing Trajectory Notes' on page 179 of the Core Strategy states that *"The plan requires that 30% of these are affordable (Policy H3). This results in 3,920 market dwellings and 1,680 affordable dwellings over the plan period. Annually the overall requirement equates to 280 dwellings per year which (shown as a red line on the chart) comprising 196 market dwellings and 84 affordable dwellings"*. As such, **the adopted Core Strategy sets a target of 84 affordable dwellings per annum**.
- 5.3 However, the affordable housing target mentioned above is underpinned by a severely dated evidence base. It is therefore important to consider the objectively assessed need for affordable housing within the most up-to-date assessments of local housing need, which crucially take into account the latest definition of affordable housing, as contained in the NPPF.

Housing Market Assessments

- 5.4 Ribble Valley have published several housing market assessments over the course of the past 17-years. These are summarised in turn below.

2008 Strategic Housing Market Assessment

- 5.5 The Core Strategy (2014) was informed by the findings of the 2008 Strategic Housing Market Assessment ("SHMA") which was published in December 2008. It should be noted that the SHMA is severely outdated and was produced prior to the introduction of the NPPF in 2012.

- 5.6 The SHMA identifies at page 77 the need for an additional **264 affordable dwellings per annum**. Page 78 of the SHMA adds that this figure is *“not designed to be an accurate or binding target for the provision of affordable rented housing as this scale of development would be extremely challenging”*.
- 5.7 Whilst the monitoring period is not clear from the content of the SHMA, it is assumed that the assessment applies to the local plan period as it underpins the adopted Core Strategy.

2020 Strategic Housing and Economic Needs Assessment

- 5.8 The 2020 Strategic Housing and Economic Needs Assessment (“SHENA”) was published in April 2020 by the consultancy Turley. Whilst the 2020 SHENA makes up part of the evidence base for the emerging Ribble Valley Local Plan, and is referenced within the Regulation 18 consultation document, it has since been updated by the 2025 Affordable Housing Needs Assessment.
- 5.9 I note that paragraph 18 sets out that **88 affordable dwellings per annum** are needed in Ribble Valley between 2019/20 and the remainder of the emerging plan period to 2032/33.

2025 Affordable Housing Needs Assessment

- 5.10 The 2025 Affordable Housing Needs Assessment (“AHNA”) was published in May 2025 by the consultancy JG Consulting. Paragraph 3.33 outlines that there is a need for **230 affordable dwellings per annum** between 2024/25 and 2027/28.
- 5.11 As set out in a meeting at Ribble Valley Borough Council on 29 May 2025⁷, the AHNA is to be used as a material consideration in determining planning applications with immediate effect, and as an evidence base document to support the development of housing policies in the emerging Ribble Valley Local Plan.
- 5.12 As such, the AHNA is the most recent ongoing affordable housing needs figure for Ribble Valley. It effectively supersedes the SHENA as the Council have approved the updated AHNA as an evidence base document to support the development of housing policies in the new Ribble Valley Local Plan. In my subsequent analysis I use this assessment as the best measure of current and future affordable housing need.

⁷ [Decision - Affordable Housing Needs Assessment | Ribble Valley Borough Council](#)

Summary and Conclusions

- 5.13 As set out within the Development Plan and its supporting housing evidence base, there is a pressing and ongoing need for new affordable homes in Ribble Valley.
- 5.14 The adopted Core Strategy sets a target of 84 affordable dwellings per annum between 2008/09 and 2027/28
- 5.15 The SHMA sets out a net affordable housing need of **264 affordable dwellings per annum** between 2008/09 and 2027/28. This assessment of housing need is severely outdated and does not consider the NPPF which was first published in 2012.
- 5.16 The SHENA sets out a net affordable housing need of **88 affordable dwellings per annum** between 2019/20 and 2032/33. Whilst this assessment of housing need was previously used to inform the emerging Ribble Valley Local Plan, it has since been replaced with the AHNA.
- 5.17 The AHNA sets out a net affordable housing need of **230 affordable dwellings per annum** between 2024/25 and 2027/28. The AHNA is the most up-to-date assessment of housing need and identifies a significantly higher affordable housing need in the next five years than the SHENA.
- 5.18 The AHNA has been recognised by the Council as the evidence base document to support the development of housing policies in the new Ribble Valley Local Plan. Of the affordable housing need assessments carried out in Ribble Valley, it should be given the most weight.

Affordable Housing Delivery

Section 6

Introduction

- 6.1 This section of my Proof of Evidence analyses the delivery of affordable housing in Ribble Valley. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across the Borough.
- 6.2 Figure 6.1 illustrates the delivery of affordable housing ("AH") in Ribble Valley since the start of the Core Strategy period in 2008/09.

Figure 6.1: Gross Additions to Affordable Housing Stock, 2008/09 to 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2008/09	75	37	49%
2009/10	89	43	48%
2010/11	69	27	39%
2011/12	147	61	41%
2012/13	172	29	17%
2013/14	183	45	25%
2014/15	345	113	33%
2015/16	300	78	26%
2016/17	390	86	22%
2017/18	400	92	23%
2018/19	412	116	28%
2019/20	559	163	29%
2020/21	453	115	25%
2021/22	499	62	12%
2022/23	546	149	27%
2023/24	349	64	18%
2024/25	332	96	29%
Total	5,320	1,376	26%
Average	313	81	26%

Source: Freedom of Information Response (21 November 2025)

- 6.3 Between 2008/09 and 2024/25, a total of 5,320 dwellings were delivered in Ribble Valley, equivalent to 313 per annum. Of these, 1,376 dwellings were affordable tenures, equivalent to 81 per annum. This equates to 26% gross affordable housing delivery.
- 6.4 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy (“RtB”) sales from existing Council and Registered Provider (“RP”) affordable housing stock.
- 6.5 At a national level over two million households have exercised their Right to Buy since it was introduced in 1980. In her Written Ministerial Statement of 30 July 2024, the former Deputy Prime Minister observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:
- “Over the last five years, there has been an average of 9,000 council Right to Buy sales annually, but only 5,000 replacements each year. Right to Buy provides an important route for council tenants to be able to buy their own home. But the discounts have escalated in recent years and councils have been unable to replace the homes they need to move families out of temporary accommodation.”*
- 6.6 Figure 6.2 below calculates the affordable housing delivery per annum since the start of the Core Strategy period in 2008/09, net of Right to Buy sales. A net loss of 52⁸ affordable dwellings over this period equates to 4% of the gross affordable housing completions of 1,376 affordable dwellings over the 17-year period.

*** Continued Overleaf ***

⁸ 1 + 51 = 52 dwellings

Figure 6.2: Net of Right to Buy Additions to Affordable Housing Stock, 2008/09 to 2024/25

Monitoring Year	Total housing completions (Net) <i>A</i>	Additions to AH Stock (Gross) <i>B</i>	LPA RtB sales <i>C</i>	RP RtB sales <i>D</i>	Additions to AH Stock (Net of RtB) <i>E</i>	Additions to AH Stock (Net of RtB) as a %age of total completions <i>F</i>
					<i>B - (C + D)</i>	<i>(E / A) X 100</i>
2008/09	75	37	0	n/a	37	49%
2009/10	89	43	0	n/a	43	48%
2010/11	69	27	0	n/a	27	39%
2011/12	147	61	0	0	61	41%
2012/13	172	29	0	3	26	15%
2013/14	183	45	0	8	37	20%
2014/15	345	113	0	6	107	31%
2015/16	300	78	0	8	70	23%
2016/17	390	86	0	4	82	21%
2017/18	400	92	0	3	89	22%
2018/19	412	116	1	1	114	28%
2019/20	559	163	0	6	157	28%
2020/21	453	115	0	3	112	25%
2021/22	499	62	0	4	58	12%
2022/23	546	149	0	0	149	27%
2023/24	349	64	0	5	59	17%
2024/25*	332	96	n/a	n/a	96	29%
Total	5,320	1,376	1	51	1,324	25%
Average	313	81	0	4	78	25%

Source: MHCLG and Freedom of Information Response (21 November 2025) *Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

- 6.7 Figure 6.2 demonstrates that on average between 2008/09 and 2024/25, the Council has added just 78 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 25% of the total average number of net housing completions. This figure is likely to fall even further if demolitions to existing stock were to be accounted for.

Affordable Housing Delivery Compared to Affordable Housing Needs

Affordable Housing Delivery Compared to the Core Strategy (2014) Target

- 6.8 Figure 6.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing target of 84 net affordable dwellings per annum between 2008/09 and 2027/28, as set out in the Core Strategy (2014).

Figure 6.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the Core Strategy (2014), 2008/09 to 2024/25

Monitoring Year	Additions to AH Stock (Net of RtB)	Core Strategy (2014) AH Target (Net)	Annual Surplus / Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2008/09	37	84	-47	-47	44%
2009/10	43	84	-41	-88	51%
2010/11	27	84	-57	-145	32%
2011/12	61	84	-23	-168	73%
2012/13	26	84	-58	-226	31%
2013/14	37	84	-47	-273	44%
2014/15	107	84	+23	-250	127%
2015/16	70	84	-14	-264	83%
2016/17	82	84	-2	-266	98%
2017/18	89	84	+5	-261	106%
2018/19	114	84	+30	-231	136%
2019/20	157	84	+73	-158	187%
2020/21	112	84	+28	-130	133%
2021/22	58	84	-26	-156	69%
2022/23	149	84	+65	-91	177%
2023/24	59	84	-25	-116	70%
2024/25*	96	84	+12	-104	114%
Total	1,324	1,428	-104	-104	93%
Average	78	84	-6	-	93%

Source: MHCLG, Freedom of Information Response (21 November 2025), and Core Strategy (2014)

* Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

- 6.9 Since the start of the Core Strategy period in 2008/09 affordable housing completions (net of Right to Buy) have averaged 78 net affordable dwellings per annum, against a target of 84 net affordable dwellings per annum. A shortfall of -104 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -6 affordable dwellings.
- 6.10 It is important to note that the needs figure identified in the Core Strategy is considerably lower than that identified in the SHMA (264 dwellings per annum), and the most recent AHNA (230 dwellings per annum).

Affordable Housing Delivery Compared to the 2008 SHMA

- 6.11 Figure 6.4 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 264 net affordable dwellings per annum between 2008/09 and 2027/28, as set out in the 2008 SHMA.

Figure 6.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2008 SHMA, 2008/09 to 2024/25

Monitoring Year	Additions to AH Stock (Net of RtB)	2008 SHMA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2008/09	37	264	-227	-227	14%
2009/10	43	264	-221	-448	16%
2010/11	27	264	-237	-685	10%
2011/12	61	264	-203	-888	23%
2012/13	26	264	-238	-1,126	10%
2013/14	37	264	-227	-1,353	14%
2014/15	107	264	-157	-1,510	41%
2015/16	70	264	-194	-1,704	27%
2016/17	82	264	-182	-1,886	31%
2017/18	89	264	-175	-2,061	34%
2018/19	114	264	-150	-2,211	43%
2019/20	157	264	-107	-2,318	59%
2020/21	112	264	-152	-2,470	42%
2021/22	58	264	-206	-2,676	22%
2022/23	149	264	-115	-2,791	56%
2023/24	59	264	-205	-2,996	22%
2024/25*	96	264	-168	-3,164	36%
Total	1,324	4,488	-3,164	-3,164	30%
Average	78	264	-186	-	30%

Source: MHCLG, Freedom of Information Response (21 November 2025), and 2008 SHMA.

*Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

- 6.12 Since the start of the 2008 SHMA period in 2008/09 affordable housing completions (net of Right to Buy) have averaged 78 net affordable dwellings per annum, against a need of 264 net affordable dwellings per annum. A shortfall of -3,164 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -186 affordable dwellings.

Affordable Housing Delivery Compared to the 2020 SHENA

- 6.13 Figure 6.5 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 88 net affordable dwellings per annum between 2019/20 and 2032/33, as set out in the 2020 SHENA.

Figure 6.5: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2020 SHENA, 2019/20 to 2024/25

Monitoring Year	Additions to AH Stock (Net of RtB)	2020 SHENA AH Needs (Net)	Annual Shortfall / Surplus	Cumulative Surplus	Additions as a %age of Needs
2019/20	157	88	+69	+69	178%
2020/21	112	88	+24	+93	127%
2021/22	58	88	-30	+63	66%
2022/23	149	88	+61	+124	169%
2023/24	59	88	-29	+95	67%
2024/25*	96	88	+8	+103	109%
Total	631	528	+103	+103	120%
Average	105	88	+17		120%

Source: MHCLG, Freedom of Information Response (21 November 2025), and 2020 SHENA

*Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

- 6.14 Since the start of the 2020 SHENA period in 2019/20 affordable housing completions (net of Right to Buy) have averaged 105 net affordable dwellings per annum, against a need of 88 net affordable dwellings per annum. A surplus of 103 affordable dwellings has arisen over the six-year period, equivalent to an average annual surplus of 17 affordable dwellings.
- 6.15 It is important to note that the affordable housing need identified in the SHENA has since been replaced by a significantly higher ongoing need in the most recent AHNA.

Affordable Housing Delivery Compared to the 2025 AHNA

- 6.16 While direct comparisons with past affordable housing delivery are limited since the available data only extends to 2024/25, it is evident that recent delivery levels have fallen significantly short of the 230 affordable dwellings per annum target outlined in the AHNA. Figure 6.6 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 230 net affordable dwellings per annum between 2024/25 and 2027/28, as set out in the 2025 AHNA.

Figure 6.6: Gross Additions to Affordable Housing Stock vs Needs Identified in the 2025 AHNA, 2024/25

Monitoring Year	Additions to AH Stock (Gross)	2025 AHNA AH Needs (Net)	Shortfall	Additions as a %age of Needs
2024/25*	96	230	-134	42%

Source: Freedom of Information Response (21 November 2025), and 2025 AHNA

*Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

- 6.17 In the first year of the 2025 AHNA period in 2024/25, there were 96 gross affordable housing completions, against a need of 230 net affordable dwellings per annum. This has resulted in a shortfall of -134 affordable dwellings in the first year of the period.
- 6.18 This shortfall in affordable housing delivery underscores the critical importance of ensuring that sites like the appeal site are assessed in a robust, fair, and balanced manner. Given the pressing need for affordable homes, such opportunities must not be overlooked or dismissed without thorough and objective consideration, as they may play a vital role in helping to meet the identified affordable housing need.

Affordable Housing Delivery in Brockhall & Dinckley Ward

- 6.19 Figure 6.7 illustrates the delivery of affordable housing in Brockhall & Dinckley Ward over the last two monitoring years⁹.

Figure 6.7: Gross Additions to Affordable Housing Stock in Brockhall & Dinckley Ward, 2023/24 and 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2023/24	0	0	0%
2024/25	20	0	0%
Totals	20	0	0%
Average	10	0	0%

Source: Freedom of Information Response (21 November 2025)

- 6.20 As Figure 6.7 shows, there have been a total of 20 net overall housing completions and zero affordable housing completions in Brockhall & Dinckley Ward over the past two monitoring years. Losses existing stock through the Right to Buy are not recorded on a parish basis. The figure given above is therefore a gross figure.

Affordable Housing Delivery in Billington & Langho Ward

- 6.21 Figure 6.8 illustrates the delivery of affordable housing in Billington & Langho Ward over the last two monitoring years.

Figure 6.8: Gross Additions to Affordable Housing Stock in Billington & Langho Ward, 2023/24 and 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2023/24	20	6	30%
2024/25	11	0	0%
Totals	31	6	0%
Average	16	3	0%

Source: Freedom of Information Response (21 November 2025)

⁹ Ribble Valley's FOI response was only able to provide ward housing completions data for the last two monitoring years.

- 6.22 As Figure 6.8 shows, there have been a total of 31 net overall housing completions and six affordable housing completions in Billington & Langho Ward over the past two monitoring years. Losses existing stock through the Right to Buy are not recorded on a parish basis. The figure given above is therefore a gross figure.

Summary and Conclusions

- 6.23 In the 17-year period since the start of the Core Strategy period in 2008/09, net of Right to Buy affordable housing delivery represented 25% of overall housing delivery, equating to 78 affordable dwellings per annum.
- 6.24 Since the start of the Core Strategy period in 2008/09, against a need of 84 net affordable dwellings per annum, a shortfall of -104 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -6 affordable dwellings.
- 6.25 Since the start of the SHMA period in 2008/09, against a need of 264 net affordable dwellings per annum, a shortfall of -3,164 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -186 affordable dwellings per annum.
- 6.26 Since the start of the SHENA period in 2019/20, against a need of 88 net affordable dwellings per annum, a surplus of 103 affordable dwellings has arisen over the six-year period, equivalent to an average annual surplus of 17 affordable dwellings. It is important to note that the affordable housing needs figure identified in the SHENA has since been replaced with a significantly higher figure in the AHNA.
- 6.27 In the first year of the 2025 AHNA period in 2024/25, there were 96 gross affordable housing completions, against a need of 230 net affordable dwellings per annum. This has resulted in a shortfall of -134 affordable dwellings in the first year of the period.
- 6.28 In my opinion it is clear that a 'step change' in affordable housing delivery is needed now in Ribble Valley to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 6.29 I consider that in light of the identified level of need there can be no doubt that the delivery of up to 90 affordable dwellings on the proposed site will make an important contribution to the affordable housing needs of Ribble Valley.

Affordability Indicators

Section 7

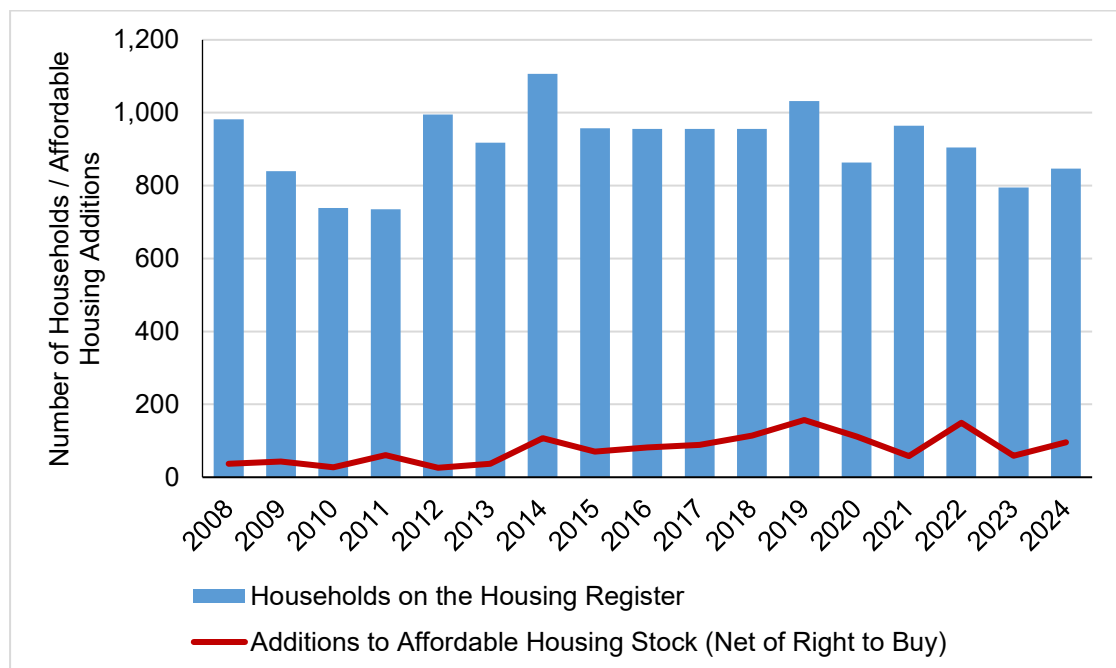
Introduction

- 7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. It is acknowledged that this is in the context of plan making.

Housing Register

- 7.2 The Ministry of Housing, Communities and Local Government's (MHCLG) data confirms that on 31 March 2024 there were **847 households on the Housing Register**. This is a 7% increase in a single year from 795 households on 31 March 2023.
- 7.3 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy) in the corresponding monitoring year ending on 31 March across Ribble Valley since the start of the Core Strategy period in 2008/09.

Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2008/09 to 2024/25



Source: MHCLG Open Data and Freedom of Information response (21 November 2025).

- 7.4 As Figure 5.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Ribble Valley since 2008.
- 7.5 Footnote 4 of MHCLG¹⁰ Live Table 600 highlights that:
- “The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, contributed to a rise in the number of households on housing registers. The Localism Act 2011 then contributed to a decrease in the number of households housing registers, as it allowed local authorities to set their own qualification criteria.”*
- 7.6 Evidently the result of the Localism Act is that many local authorities, including Ribble Valley, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.
- 7.7 Following the changes brought about by the Localism Act, Ribble Valley published a revised Housing Allocations Scheme which received further revisions in **2023**.
- 7.8 Despite this it is important to reiterate that the number of households on the Housing Register has actually increased by 7% in the past 12-months, indicating a worsening of affordability across Ribble Valley.
- 7.9 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.
- 7.10 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. social rented, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

¹⁰ Ministry of Housing, Communities and Local Government

- 7.11 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the NPPF.
- 7.12 As such, the number of households on the Housing Register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

Temporary Accommodation

- 7.13 The Council's FOI response (**Appendix JS1**) confirms that on 31 March 2025, there were 11 households housed in temporary accommodation by the Borough. In 2023/24, Ribble Valley's gross spend on temporary accommodation costs was £83,000.

Homelessness

- 7.14 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023¹¹, the Council accepted 22 households in need of homelessness prevention duty¹², and a further 54 households in need of relief duty¹³ from the Council.
- 7.15 Page 16 of the Ribble Valley Borough Council Homelessness Strategy 2022 to 2025 states that affordability *"has a massive impact on all aspects of the homelessness service and is at the root of all obstacles in homelessness prevention"*. The Strategy adds that *"Affordability has always been a key barrier in Ribble Valley"*.
- 7.16 Furthermore a 2017 report by the National Audit Office ("NAO") found that *"The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England."*

¹¹ Homelessness data in Ribble Valley for 2023/24 is currently unavailable

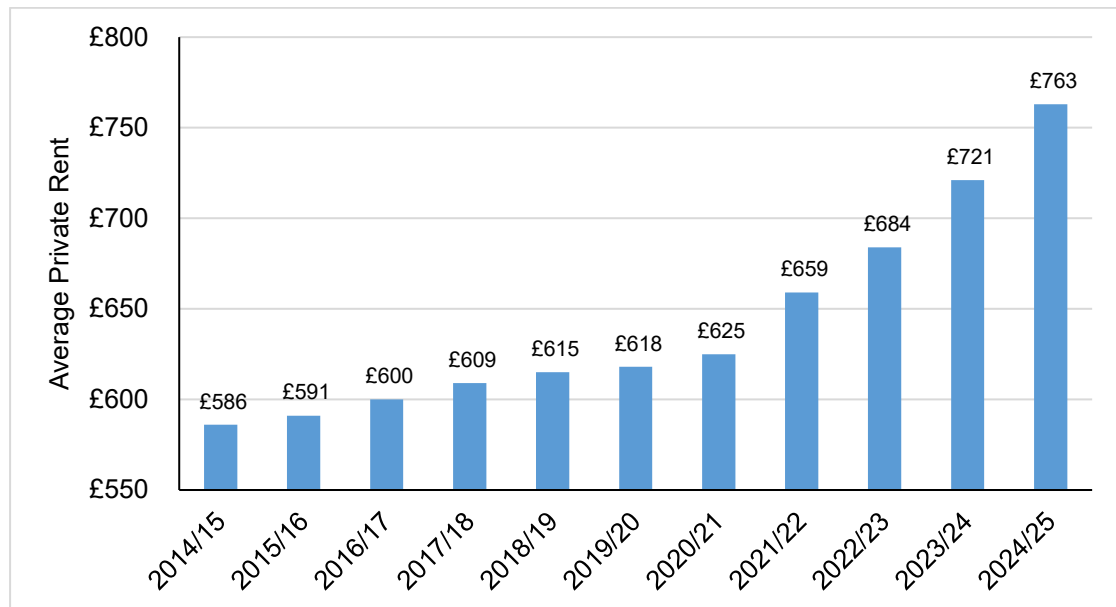
¹² The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

¹³ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

Private Rental Market

- 7.17 Office for National Statistics (“ONS”) data (first produced in 2014/15) shows that average (mean) private rents in Ribble Valley stood at £763 per calendar month (“pcm”) in 2024/25. This represents a 30% increase from 2013/14 where average private rents stood at £586 pcm.

Figure 7.2: Average (Mean) Private Sector Rents, Ribble Valley, 2014/15 to 2024/25



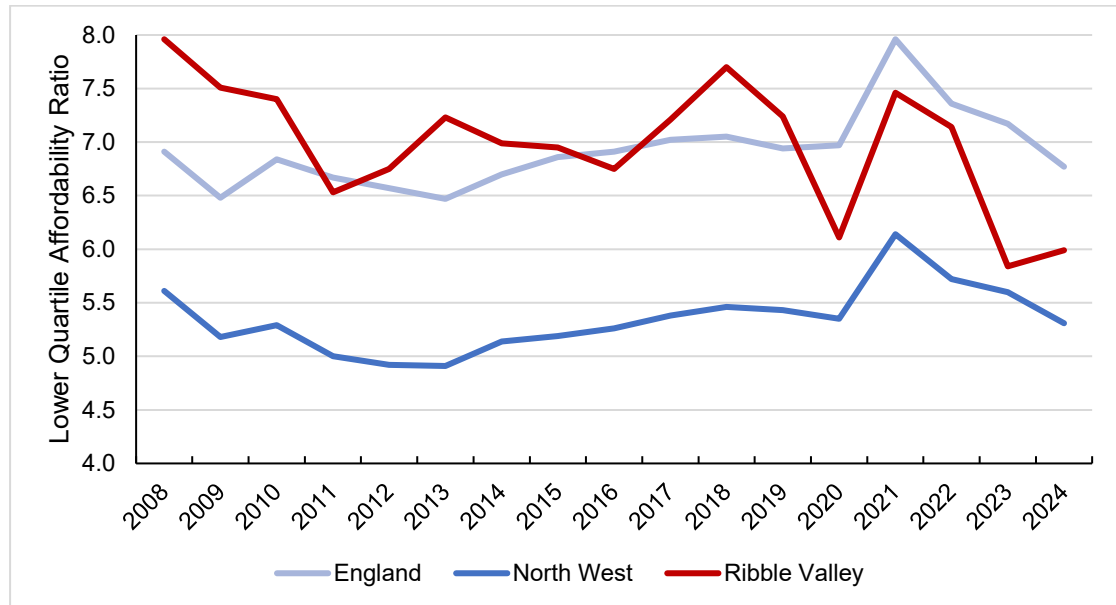
Source: VOA and ONS.

- 7.18 It should also be noted that since the start of the 2020 SHENA period in 2019/20, average rents in Ribble Valley have increased by 22%.
- 7.19 It is important to note that ONS rental data is calculated using all transaction data, i.e., existing lets as well as new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Ribble Valley.

Lower Quartile House Prices

- 7.20 For those seeking a lower quartile priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of lower quartile house price to incomes in Ribble Valley in 2024 stood at **6.17**.
- 7.21 The ratio in Ribble Valley stands above the North West English region average of 5.42 (+14%). It follows that housing in this area is significantly unaffordable for a significant part of the local population.

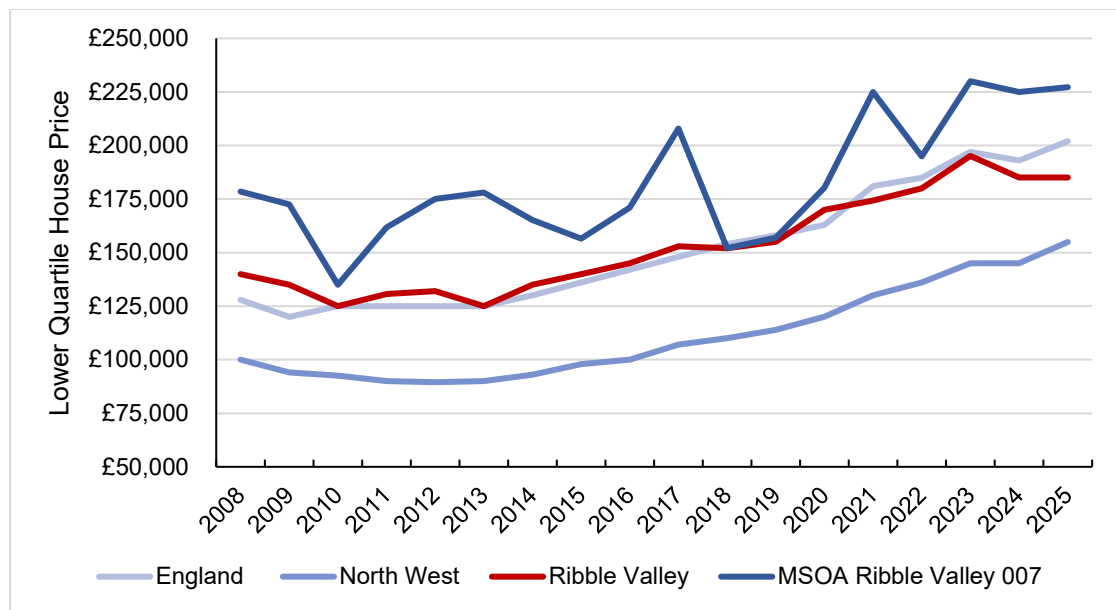
Figure 7.3: Lower Quartile Workplace-Based Affordability Ratio comparison, 2008/09 to 2024/25



Source: ONS.

- 7.22 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 37% higher than that.
- 7.23 Figure 7.4 illustrates the lower quartile house sale prices for England, the North West English region, Ribble Valley and MSOA Ribble Valley 007. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2008 and 2025.

Figure 7.4: Lower Quartile House Prices, 2008/09 to 2025/26



Source: ONS.

- 7.24 The lower quartile house price across Ribble Valley has risen by 32% from £140,000 in 2008 to £185,000 in 2025. Similarly, the lower quartile house price across MSOA Ribble Valley 007 has risen by 27% from £178,500 in 2008 to £227,212 in 2025. It should also be noted that since the start of the 2020 SHENA period lower quartile house prices in MSOA Ribble Valley 007 have increased by 45%.
- 7.25 In 2025 lower quartile house prices in MSOA Ribble Valley 007 (£227,212,000) were 23% higher than across Ribble Valley (£185,000), 47% higher than across the North West English region (£154,950) and 12% higher than the national figure (£202,000).

Summary and Conclusions

- 7.26 As demonstrated through the analysis in this section, affordability across Ribble Valley has been, and continues to be, in crisis.
- 7.27 House prices and rent levels in the lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Ribble Valley out of the reach of more and more people.
- 7.28 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Ribble Valley, with a lower quartile house price to average income ratio of 6.17, which is 14% higher than the North West English region average of 5.42.

- 7.29 Market signals indicate a worsening trend in affordability in Ribble Valley and within MSOA Ribble Valley 007. In my opinion, by any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Benefits of the Proposed Affordable Housing at the Appeal Site

Section 8

Introduction

- 8.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 8.2 As set out in the previous chapter there are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level. Ribble Valley is no exception to this.
- 8.3 The appeal scheme will provide up to 90 affordable dwellings on site. The wider social and economic benefits of affordable housing commonly recognised.
- 8.4 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals.

Benefits of the proposed Affordable Housing at the appeal site

- 8.5 The affordable housing offer meets the requirements of adopted Policy H3 of the Core Strategy (30%). It should be noted that these policies were drafted to capture a benefit rather than to ward off harm or be needed in mitigation.
- 8.6 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**Appendix JS4**) in September 2018 who was clear at paragraph 72 of their decision that:

“[I]n the light of the Council’s track record, the proposals’ full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit” (my emphasis).

8.7 Similarly, as recognised in a recent appeal decision in at Coombebury Cottage, Dunsfold (**Appendix JS5**) *“the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs.”* The benefits of the proposed affordable homes at the appeal site should therefore be independently weighed within the planning balance to ensure that its distinct contribution in addressing housing needs is fully appreciated.

8.8 The affordable housing benefits of the appeal scheme are therefore:

- Policy compliant offer of 30% (up to 90 dwellings) of the scheme provided as affordable housing;
- A deliverable scheme which provides much needed affordable homes;
- In a sustainable location;
- Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation¹⁴; and
- Greater security of tenure than the private rented sector.

8.9 In my opinion these benefits are substantial and a strong material consideration weighing heavily in favour of the proposal.

Summary and Conclusions

8.10 The acute level of affordable housing need in Ribble Valley, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can.

8.11 In my opinion, affordable housing is an individual benefit of the appeal proposals which should be afforded **substantial weight** in the determination of this appeal.

¹⁴ Watt a Save by HBF – October 2022.

Conclusions and Recommendations

Section 9

Introduction

- 9.1 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 9.2 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.
- 9.3 Market signals indicate a worsening trend in affordability across Ribble Valley and, by any measure of affordability, this is an Authority amid an affordable housing emergency, and urgent action must be taken to deliver more affordable homes.

Affordable Housing Offer

- 9.4 Hallam Land Management Limited proposes the development of up to 300 dwellings of which 30% (up to 90 units) will be provided as affordable units at Land at Longsight Road, Langho. This level of provision meets the requirements of Policy H3 of the Core Strategy (2014).
- 9.5 The proposed affordable housing will be secured by way of a Section 106 planning obligation, and the tenure split of the development will be agreed with the Council at this stage.

Local Policy Position

- 9.6 The relevant Development Plan for the appeal site comprises the Ribble Valley Core Strategy (2014) and the Housing and Economic Development – Development Plan Document (adopted 2019).
- 9.7 I have clearly highlighted that within adopted policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key priority for Ribble Valley Borough Council.

Affordable Housing Needs

- 9.8 The Core Strategy (2014) identifies a need for 84 affordable dwellings per annum between 2008/09 and 2027/28.
- 9.9 The SHMA identifies a need for 264 affordable dwellings per annum, and whilst the monitoring period is not clear from the content of the SHMA, it is assumed that the assessment applies to the local plan period as it underpins the adopted Core Strategy.
- 9.10 The SHENA identifies a need for 88 affordable dwellings per annum between 2019/20 and 2032/33. Whilst the SHENA made up part of the evidence base for the emerging Ribble Valley Local Plan, and is referenced within the Regulation 18 consultation document, it has since been updated by the AHNA.
- 9.11 The AHNS identifies a need for 230 affordable dwellings per annum between 2024/25 and 2027/28. The AHNA is the most up-to-date ongoing affordable housing needs figure for Ribble Valley; effectively superseding the SHENA as the Council have approved the updated AHNA as an evidence base document to support the development of housing policies in the new Ribble Valley Local Plan.

Affordable Housing Delivery

- 9.12 On average between 2008/09 and 2024/25, the Council has added just 78 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 25% of the total average number of net housing completions.
- 9.13 Since the start of the Core Strategy period in 2008/09 affordable housing completions (net of Right to Buy) have averaged just 78 net affordable dwellings per annum, against a need of 84 net affordable dwellings per annum. A shortfall of -104 affordable dwellings has arisen over the 17-year period, equivalent to an average annual surplus of -6 affordable dwellings. However, it is important to note that the needs figure identified in the Core Strategy is considerably lower than that identified in the SHMA (264 dwellings per annum), and the most recent AHNA (230 dwellings per annum).
- 9.14 Since the start of the SHMA period in 2008/09 affordable housing completions (net of Right to Buy) have averaged just 78 net affordable dwellings per annum, against a need of 264 net affordable dwellings per annum. A shortfall of -3,164 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -186 affordable dwellings.

- 9.15 Since the start of the SHENA period in 2019/20 affordable housing completions (net of Right to Buy) have averaged 105 net affordable dwellings per annum, against a need of 88 net affordable dwellings per annum. A surplus of 103 affordable dwellings has arisen over the six-year period, equivalent to an average annual surplus of 17 affordable dwellings. However, it is important to note that the affordable housing need identified in the SHENA has since been replaced by a significantly higher ongoing need in the most recent AHNA.
- 9.16 In the first year of the 2025 AHNA period in 2024/25, there were 96 gross affordable housing completions, against a need of 230 net affordable dwellings per annum. This has resulted in a shortfall of -134 affordable dwellings in the first year of the period.
- 9.17 Given these significant shortfalls in affordable housing across Ribble Valley, the appeal proposals provide an affordable housing contribution which would contribute significantly towards addressing this key corporate priority

Affordability

- 9.18 In addition to the persistent shortfall in affordable housing delivery against objectively assessed needs other indicators further point to an affordability crisis in Ribble Valley. Set out below are the key findings in respect of affordability across the Borough:

Housing Needs

- a. On 31 March 2024 there were 847 households on the Housing Register. This represents a 7% increase in a single year from 795 households on 31 March 2023.
- b. On 31 March 2025, there were 11 households housed in temporary accommodation by the Borough.
- c. In 2023/24, Ribble Valley's gross spend on temporary accommodation costs was £83,000.
- d. In the 12 months between 1 April 2022 and 31 March 2023¹⁵, the Council accepted 22 households in need of homelessness prevention duty¹⁶, and a further 54 households in need of relief duty¹⁷ from the Council.

¹⁵ Homelessness data in Ribble Valley for 2023/24 is currently unavailable

¹⁶ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

¹⁷ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

Private Rental Market

- e. The average lower quartile monthly rent in Ribble Valley in 2024/25 was £763 pcm. This represents a 30% increase from 2014/15 where average lower quartile monthly rents stood at £586 pcm.

Lower Quartile House Prices

- f. The ratio of lower quartile house price to incomes in Ribble Valley now stands at 6.17, which is above the North West English region average of 5.42 (+14%).
 - g. In 2025 lower quartile house prices in MSOA Ribble Valley 007 (£227,212,000) were 23% higher than across Ribble Valley (£185,000), 47% higher than across the North West English region (£154,950) and 12% higher than the national figure (£202,000).
- 9.19 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Langho, as well as across Ribble Valley.
- 9.20 This demonstrates an acute need for affordable housing in Ribble Valley and one which the Council and decision takers need to do as much as possible to address as required to do so, proactively, by the NPPF (2024).

Summary and Conclusions

- 9.21 There are serious and persistent affordability challenges across Ribble Valley. This is exemplified by the affordability indicators which show a poor and worsening affordability across the Ribble Valley.
- 9.22 In my opinion there is an acute housing crisis in Ribble Valley, with a lower quartile house price to income ratio of 6.17. Mortgage lending is typically offered based on up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 37% higher than that.
- 9.23 Boosting the supply of affordable homes will mean that households needing affordable housing will spend less time in unsuitable accommodation. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.

9.24 The affordable housing benefits of the appeal scheme are therefore:

- Policy compliant 30% (up to 90 dwellings) of the scheme provided as affordable housing;
- A deliverable scheme which provides much needed affordable homes;
- In a sustainable location;
- With the affordable homes managed by a Registered Provider;
- Which provide better quality affordable homes; and
- Greater security of tenure than the private rented sector.

9.25 Evidently, there can be no doubt that the provision of up to 90 affordable dwellings on this site to help those in acute need in Ribble Valley and in my opinion should be afforded **substantial weight** in the determination of this appeal.

Appendix JS1

Freedom of Information Correspondence (21 November 2025)



RIBBLE VALLEY BOROUGH COUNCIL

please ask for: Jenny Martin

e-mail: jenny.martin@ribblevalley.gov.uk

our ref: Request 9728

date: 21 November 2025

Council Offices
Church Walk
CLITHEROE
Lancashire BB7 2RA

Switchboard: 01200 425111
Fax: 01200 414488
www.ribblevalley.gov.uk

BY EMAIL

Dear Mr Price,

Internal Review – Freedom of Information Request 9728

I write further to your email dated 23 October 2025 in which you requested an internal review under the Freedom of Information Act 2000 ("FOIA"). I have been appointed to complete the review.

BACKGROUND

On 26 June 2025, you wrote to the Council and requested the following information:

I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters in Brockhall & Dinckley Ward and Billington & Langho Ward, as well as the Ribble Valley Borough Council area.

Please see below the FOI request. Please let me know if you have any queries or require any clarification; I look forward to hearing from you within the relevant timescales.

Confirmation of receipt would be greatly appreciated.

Freedom of Information Request

Questions 1 to 11 of this request relate to data held by the Housing Department.

Questions 12 to 17 of this request relate to data held by the Planning Department.

Housing Register

1. *The total number of households on the Council's Housing Register at 31 March 2025.*
2. *The average waiting times on 31 March 2025 for the following types of affordable property across the Authority:*
 - a. *1-bed affordable dwelling;*
 - b. *2-bed affordable dwelling;*
 - c. *3-bed affordable dwelling; and*
 - d. *A 4+ bed affordable dwelling.*
3. *The average waiting times on 31 March 2024 for the following types of affordable property across the Authority:*
 - a. *1-bed affordable dwelling;*

- b. 2-bed affordable dwelling;
 - c. 3-bed affordable dwelling; and
 - d. A 4+ bed affordable dwelling.
4. The total number of households on the Council's Housing Register at 31 March 2025 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2025)
Brockhall & Dinckley Ward	
Billington & Langho Ward	

5. The number of properties advertised, and the average number of bids per property over the 2024/25 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Brockhall & Dinckley Ward		Billington & Langho Ward	
	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:
- The date they occurred;
 - What they entailed; and
 - Copies of the respective documents

Social Housing Stock

7. The total number of social housing dwelling stock on 31 March 2025 in the following locations:

Location	Total Social Housing Stock (31 March 2025)
Brockhall & Dinckley Ward	
Billington & Langho Ward	

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2024 and 31 March 2025; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	Social Housing Lettings	
	1 April 2024 to 31 March 2025	1 April 2023 to 31 March 2024
Brockhall & Dinckley Ward		
Billington & Langho Ward		

Temporary Accommodation

9. The number of households housed in temporary accommodation within and outside the Ribble Valley Borough Council region on the following dates:

Households in Temporary Accommodation	31 March 2025	31 March 2024
<i>Households Housed within Ribble Valley Borough Council</i>		
<i>Households Housed outside Ribble Valley Borough Council</i>		
<i>Total Households</i>		

10. The amount of money spent on temporary accommodation per household within the Ribble Valley Borough Council area over the following periods:
- 1 April 2024 to 31 March 2025.
11. The amount of money spent on temporary accommodation per household outside the Ribble Valley Borough Council area over the following periods:
- 1 April 2024 to 31 March 2025.

Housing Completions

12. The number of NET housing completions in the Ribble Valley Borough Council area broken down on a per annum basis for the period between 2000/01 and 2024/25.
13. The number of NET affordable housing completions in the Ribble Valley Borough Council area broken down on a per annum basis for the period between 2000/01 and 2024/25.
14. The number of NET housing completions in Brockhall & Dinckley Ward broken down on a per annum basis for the period between 2000/01 and 2024/25.
15. The number of NET affordable housing completions in Brockhall & Dinckley Ward broken down on a per annum basis for the period between 2000/01 and 2024/25.
16. The number of NET housing completions in Billington & Langho Ward broken down on a per annum basis for the period between 2000/01 and 2024/25.
17. The number of NET affordable housing completions in Billington & Langho Ward broken down on a per annum basis for the period between 2000/01 and 2024/25.

On 2 September 2025 the Council responded with the following information:

Housing Register

Having reviewed your request for information, we have identified that due to the nature of the information that you are seeking, your request may be more appropriately addressed to Onward Homes formerly Ribble Valley Homes who are responsible for social housing in the Ribble Valley and should be able to help you with your request.

Ribble Valley Borough Council commission Onward Homes to manage the waiting list as part of the housing stock transfer 2008. Ribble Valley Borough Council do not hold/manage a register of residents in housing need/waiting list.

Onward Homes, are responsible for social housing in the Ribble Valley and can be contacted on telephone number – 0300 555 0600

Social Housing Stock

The Council disposed of its housing in 2008.

Onward Homes, formerly Ribble Valley Homes are responsible for social housing in the Ribble Valley.

Onward Home can be contacted on:

Telephone – 0300 555 0600

Write to: CustomerServices@onward.co.uk

Social Housing Lettings

The Council disposed of its housing in 2008.

Onward Homes, formerly Ribble Valley Homes are responsible for social housing in the Ribble Valley.

Onward Home can be contacted on:

Telephone – 0300 555 0600

Write to: CustomerServices@onward.co.uk

Temporary Accommodation

To Follow

Housing Completions

Please note the Council only hold data from 2016.

12.

2016	78
2017	
2018	92
2019	116
2020	162
2021	115
2022	62
2023	149
2024	64
2025	96

13. To Follow.

14. To Follow.

15. Nil

16 To Follow.

17. 2016 – 15 units

2025 – 5 units

On 23 October 2025 you emailed the Council's FOI team attaching a letter which requested that an internal review be carried out. A copy of this letter is attached for ease of reference.

On 11 November 2025 you emailed the Council's FOI team as follows:

I am writing to request an update regarding the below Freedom of Information (FOI) request.

The FOI request was submitted on 26 June 2025, with a partial response to the FOI request received on 2 September 2025. The response to our questions 1 to 17 in respect of housing are almost entirely incomplete.

I would like to remind the Council that the statutory response time is 20-working days, which elapsed several months ago. A request for an Internal Review of the matter was also submitted on 23 October, which the Council have 20-working days to respond to.

We are extremely disappointed with the apparent lack of action by the Council. If we do not receive a reply with the full response by 1pm on Friday 21 November, we will be escalating the matter to the Information Commissioner's Office.

REVIEW

Section 1 of the FOIA 2000 states that:

- (1) Any person making a request for information to a public authority is entitled-
 - (a) To be informed in writing by the public authority whether it holds information of the description specified in the request, and
 - (b) If that is the case, to have that information communicated to him

Section 3(2) further states that for the purposes of this Act, information is **held** by a public authority if-

- (a) It is held by the authority, otherwise than on behalf of another person, or
- (b) It is held by another person on behalf of the authority

Having considered this matter I believe that unfortunately there were errors made initially when carrying out the appropriate searches to determine whether the Council held the information that you requested. I sincerely apologise for this but can confirm that these checks have now been undertaken. The Council have also liaised directly with Onward Homes.

Unfortunately, Ribble Valley Borough Council do not hold all the information that you requested, but please find below responses to the questions you asked:

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2025.
This information is not within Ribble Valley Borough Council's possession. Enquiries have been made with Onward Homes who confirm that they do not hold this information.
2. The average waiting times on 31 March 2025 for the following types of affordable property across the Authority:
 - a. 1-bed affordable dwelling;
 - b. 2-bed affordable dwelling;
 - c. 3-bed affordable dwelling; and
 - d. A 4+ bed affordable dwelling.

This information is not within Ribble Valley Borough Council's possession. Enquiries have been made with Onward Homes who confirm that they do not hold this information.

3. The average waiting times on 31 March 2024 for the following types of affordable property across the Authority:
 - a. 1-bed affordable dwelling;
 - b. 2-bed affordable dwelling;
 - c. 3-bed affordable dwelling; and
 - d. A 4+ bed affordable dwelling.

This information is not within Ribble Valley Borough Council's possession. Enquiries have been made with Onward Homes who confirm that they do not hold this information.

4. The total number of households on the Council's Housing Register at 31 March 2025 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2025)
Brockhall & Dinckley Ward	
Billington & Langho Ward	

This information is not within Ribble Valley Borough Council's possession. Enquiries have been made with Onward Homes who confirm that they do not hold this information.

5. The number of properties advertised, and the average number of bids per property over the 2024/25 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Brockhall & Dinckley Ward		Billington & Langho Ward	
	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

Ribble Valley Borough Council do not have a choice Based Lettings scheme. Houses are allocated from a housing waiting list.

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:
 - The date they occurred; **There has been regular minor changes to reflect national policy change and full review in 2024**
 - What they entailed; **A change to points awarded and further priority given to Homeless families.**
 - Copies of the respective documents:

Report to Health & Housing Committee on 28 August 2025

<https://ribblevalleyintranet.moderngov.co.uk/documents/s9883/AMENDMENTS%20TO%20ALLOCATION%20POLICY%20-%2028%20AUGUST%2025%20003.pdf>

<https://ribblevalleyintranet.moderngov.co.uk/documents/s9813/ALLOCATION%20policy%20amended%20Aug%2025.pdf>

Report to Health & Housing Committee on 6 June 2024

<https://ribblevalleyintranet.moderngov.co.uk/documents/s7500/Adoption%20of%20the%20Allocation%20Policy%20June%2024Final.pdf>

<https://ribblevalleyintranet.moderngov.co.uk/documents/s7522/ALLOCATIONS%20REVIEW%202023%20-%20RVBC%20draft%206%20Final.pdf>

Report to Health & Housing Committee on 14 January 2021

<https://ribblevalleyintranet.moderngov.co.uk/documents/s642/Revised%20Allocations%20Policy.pdf>

The Council's current Housing Allocations Policy can be viewed at: <https://www.ribblevalley.gov.uk/downloads/file/3963/allocations-policy>

Social Housing Stock

7. The total number of social housing dwelling stock on 31 March 2025 in the following locations:

Location	Total Social Housing Stock (31 March 2025)
Brockhall & Dinckley Ward	2
Billington & Langho Ward	55

This information is not within Ribble Valley Borough Council's possession. Enquiries have been made with Onward Homes who confirm that they do not hold this information.

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2024 and 31 March 2025; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	Social Housing Lettings	
	1 April 2024 to 31 March 2025	1 April 2023 to 31 March 2024
Brockhall & Dinckley Ward		
Billington & Langho Ward		

This information is not within Ribble Valley Borough Council's possession. Enquiries have been made with Onward Homes who confirm that they do not hold this information.

Temporary Accommodation

9. The number of households housed in temporary accommodation within and outside the Ribble Valley Borough Council region on the following dates:

Households in Temporary Accommodation	31 March 2025	31 March 2024
Households Housed within Ribble Valley Borough Council	11	12
Households Housed outside Ribble Valley Borough Council	0	0
Total Households	11	12

10. The amount of money spent on temporary accommodation per household within the Ribble Valley Borough Council area over the following periods:

- 1 April 2024 to 31 March 2025. **To follow**

11. The amount of money spent on temporary accommodation per household outside the Ribble Valley Borough Council area over the following periods:

- 1 April 2024 to 31 March 2025. **To follow**

Housing Completions

12. The number of **NET** housing completions in the Ribble Valley Borough Council area broken down on a per annum basis for the period between 2000/01 and 2024/25.

2008/09 - 75
2009/10 - 89
2010/11 - 69
2011/12 - 147
2012/13 - 172
2013/14 - 183

2014/15 - 345
2015/16 - 300
2016/17 - 390
2017/18 - 400
2018/19 - 412
2019/20 - 559
2020/21 - 453
2021/22 - 499
2022/23 - 546
2023/24 - 349
2024/25 - 332

13. The number of NET affordable housing completions in the Ribble Valley Borough Council area broken down on a per annum basis for the period between 2000/01 and 2024/25.

2008/09 - 37
2009/10 - 43
2010/11 - 27
2011/12 - 61
2012/13 - 29
2013/14 - 45
2014/15 - 113
2015/16 - 78
2016/17 - 86
2017/18 - 92
2018/19 - 116
2019/20 - 163
2020/21 - 115
2021/22 - 62
2022/23 - 149
2023/24 - 64
2024/25 - 96

14. The number of NET housing completions in Brockhall & Dinckley Ward broken down on a per annum basis for the period between 2000/01 and 2024/25.

2023/24 - 0
2024/25 - 20

15. The number of NET affordable housing completions in Brockhall & Dinckley Ward broken down on a per annum basis for the period between 2000/01 and 2024/25.

2023/24 - 0
2024/25 - 0

16. The number of NET housing completions in Billington & Langho Ward broken down on a per annum basis for the period between 2000/01 and 2024/25.

2023/24 - 20
2024/25 - 11

17. The number of NET affordable housing completions in Billington & Langho Ward broken down on a per annum basis for the period between 2000/01 and 2024/25.

2023/24 - 6
2024/25 - 0

In relation to questions 12-17, the Council do not hold information for all the years requested.

During my review I have considered Section 10(1) of the Freedom of Information Act ("FOIA") 2000 which requires public authorities to respond to requests for information promptly and, in any event, no later than twenty working days from the date of receipt. The Council acknowledges that this statutory deadline was not met in your case, and I would like to offer a sincere apology for the delay.

We recognise the importance of timely responses and apologise for any inconvenience caused. We aim to provide you with a substantive response to questions 10 and 11 within 10 working days of this internal review letter.

If you are not content with the outcome of this internal review, you may contact the Information Commissioner's Office:

The Information Commissioner's Office Wycliffe House,
Water Lane,
Wilmslow,
Cheshire SK9 5AF

www.ico.org.uk

Yours sincerely

JENNY MARTIN
LAWYER - LEGAL AND DEMOCRATIC SERVICES

Appendix JS2

Extracts from Planning Practice Guidance (March 2014,
Ongoing Updates)



Extracts from Planning Practice Guidance

Appendix TKP2

*as of 04/01/2024

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-006-20190220	This section sets out that assessments of housing need should include considerations of and be adjusted to address affordability. This paragraph sets out that <i>“an affordability adjustment is applied as household growth on its own is insufficient as an indicators or future housing need.”</i> This is because: • <i>“Household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and</i> • <i>people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.”</i> <i>“The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.”</i>
Housing and Economic Needs Assessment	018 Reference ID 2a-01820190220	Sets out that <i>“all households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework”</i> .
Housing and Economic Needs Assessment	019 Reference ID 2a-01920190220	States that <i>“strategic policy making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments).</i>
Housing and Economic Needs Assessment	020 Reference ID 2a-02020190220	The paragraph sets out that in order to calculate gross need for affordable housing, <i>“strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:</i> • <i>the number of homeless households;</i>

		• <i>the number of those in priority need who are currently housed in temporary accommodation;</i> • <i>the number of households in over-crowded housing;</i> • <i>the number of concealed households;</i> • <i>the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and</i> • <i>the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration."</i>
Housing and Economic Needs Assessment	024 Reference ID 2a-02420190220	The paragraph states that <i>"the total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period"</i>. It also details that: <i>"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."</i>
Housing Supply and Delivery	031 Reference ID: 68-031-20190722	With regard to how past shortfalls in housing completions against planned requirements should be addressed, the paragraph states: <i>"The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach)..."</i>

Appendix JS3

Appeal Decision: Land at Sondes Place Farm

(November, 2023)





Appeal Decision

Inquiry held on 31 October, 1-2 November and 6-7 and 9 November 2023

Site visit made on 2 November

by Andrew McGlone BSc MCD MRTPI

an Inspector appointed by the Secretary of State

Decision date: 28 November 2023

Appeal Ref: APP/C3620/W/23/3324631

Land at Sondes Place Farm, Westcott Road, Dorking RH4 3EF

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
- The appeal is made by Gleeson Land against the decision of Mole Valley District Council.
- The application Ref MO/2023/0188, dated 8 February 2023, was refused by notice dated 5 June 2023.
- The development proposed is an outline application with all matters reserved except principal means of access to the highway for residential development of up to 144 dwellings including the creation of new vehicular access, school parking and drop-off/pick-up, gypsy and traveller pitches (0.2ha), public open space, landscape planting, surface water attenuation and associated infrastructure.

Decision

1. The appeal is allowed and outline planning permission is granted with all matters reserved except principal means of access to the highway for residential development of up to 144 dwellings including the creation of new vehicular access, school parking and drop-off/pick-up, gypsy and traveller pitches (0.2ha), public open space, landscape planting, surface water attenuation and associated infrastructure at land at Sondes Place Farm, Dorking RH4 3EF in accordance with the terms of the application, Ref MO/2023/0188, dated 8 February 2023, subject to the attached schedule of conditions.

Preliminary Matters

2. The application submitted was in outline form with all matters reserved for future consideration, except for the principal means of access from Westcott Road. While an illustrative masterplan and landscape strategy have been submitted, I have considered them as potential ways that the appeal site could be developed for the development proposed. My consideration of the appeal is based on the site location plan, parameters plan, and the proposed site access arrangement – A25 Westcott Road plan (plan Ref: ITB12131-GA-019 Rev D).
3. Due to unforeseen events after the submission of his Proof of Evidence, Mr Stacey was unable to attend and give evidence to the Inquiry. Instead, Miss Gingell adopted his evidence on affordable housing as her own and spoke to it.
4. Shortly after the Inquiry closed, the appellant submitted a signed and dated s106 agreement (s106 agreement). The main parties agree that the s106 agreement addresses the second reason for refusal concerning the provision of affordable housing, and part of the third reason for refusal relating to the monitoring of the Travel Plan. The s106 agreement includes further measures: a Traffic Regulation Order (TRO), and mechanisms to secure the delivery of a

travel plan, highway works, on-site public open space with children's play area and Gypsy and Traveller pitches along with subsequent management and maintenance arrangements for the public open space and Gypsy and Traveller pitches. These matters did not form part of the Council's reasons for refusing planning permission, but I will consider the planning obligations and the s106 agreement later in my decision.

5. On 22 November 2023, all designated Areas of Outstanding Natural Beauty (AONB) in England and Wales became "National Landscapes". The legal designation and policy status of AONBs are unchanged, but I have replaced reference to the Surrey Hills AONB with the Surrey Hills National Landscape (SHNL) in my decision to reflect this change.

Background

6. The emerging Mole Valley Local Plan 2020-2037 (ELP) was submitted for Examination in Public (EiP) in February 2022. The hearing sessions for the ELP were completed in October 2022 and the Examining Inspector subsequently published actions and main modifications (MM's) in December 2022 and February 2023. The ELP submitted, EiP and subject of the MM's is based on the release of several sites in the Metropolitan Green Belt (Green Belt) for housing. However, the ELP has been paused since the consultation draft of the National Planning Policy Framework¹. This pause started 13 December 2022 and has continued to date pending the anticipated publication of updated national policy and to account for the May 2023 local elections. The Council seek clarity on the national approach to whether Green Belt is required to meet housing need, so the ELP is consistent with national policy. The parties hold contrasting views about the consistency of the consultation draft document and the ELP, but no one knows until such a time when the updated Framework is published, and it can be taken into account².
7. In the meantime, the Council says that it has been working in the background. Much of this work is not in the public domain, but in short, if the Council does not need to release Green Belt sites to deliver housing, it would seek to remove all the Green Belt site allocations from the ELP by additional MM's³. Even so, the Examining Inspector has made it clear that further hearing sessions will likely be required, and some of the ELP's strategic issues will need to be interrogated if this approach is pursued. This is likely to require a revised evidence base to justify the Council's chosen approach. Also, other aspects of the ELP's evidence base will need updating due to significant delays incurred⁴.
8. If the Council proceeds with the ELP as examined (Green Belt sites in) then it envisages being able to adopt the ELP in June or July 2024. The appellant does not raise issue with that timeframe. Nor do I. If the Council takes the ELP forward with Green Belt sites removed, the Council estimates adopting the plan in July 2024. The appellant disagrees, and I share their doubts about the Council's timeline. There are several issues to clarify. The first is whether the additional MM's could be carried out under the guise of the ELP or whether it is effectively a new plan. That is a matter for the Examining Inspector.
9. The extent of the other work indicated by the Examining Inspector is unclear

¹ CD1.5

² CD3.4

³ CD3.22

⁴ CD3.23

and while the Council may have been working in the background on this, consultation and hearing sessions need to take place, and the Examining Inspector will need to consider the evidence, whether there are any objections, and determine whether the plan is sound. In short, there are too many variables to be certain that the Council's timeframe on the ELP without Green Belt sites will occur.

Main Issues

10. The appeal site comprises two arable fields within the Green Belt outside of the settlement boundary for Dorking. Due to the appeal site's location and the development proposed, it is common ground that the appeal scheme would be inappropriate development in the Green Belt, having regard to the National Planning Policy Framework (the Framework)⁵.
11. Consequently, the main issues in this case are:
 - (a) whether the proposal would accord with the spatial strategy of the development plan;
 - (b) the effect of the proposal on the openness of the Green Belt, and the purposes of including the land within it;
 - (c) the effect of the proposed development on the character and appearance of the area, including the countryside and the Surrey Hills National Landscape (SHNL);
 - (d) whether the Council can demonstrate a five-year supply of deliverable housing sites;
 - (e) whether the proposal would make adequate provision for affordable housing, public open space, highway improvement schemes, a TRO, a demand responsive bus service, car club vehicles and spaces; and Gypsy and Traveller pitches; and
 - (f) whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify the development.

Reasons

Spatial strategy

12. Mole Valley's spatial strategy is set out in Policies CS1 and CS2 of The Mole Valley Local Development Framework Core Strategy (Core Strategy). Core Strategy Policy CS 1(3) confirms that in the countryside, development will be considered in the light of other policies within the Core Strategy and other policy documents, which have now either been replaced by the Framework or revoked. Hence, I will take into account the Framework when considering the proposal's compliance with Core Strategy Policy CS 1(3), noting that no other criterion in Policy CS 1 are relevant to the proposal.
13. Core Strategy Policy CS 2 outlines the number of homes that will be provided for in the District during the plan period of 2006 to 2026. It then sets out how this will be achieved by directing residential development to defined built-up areas, infilling and limited residential development at specific locations and through rural exception sites. As the policy seeks to direct the distribution of

⁵ CD1.1

development, the policy is relevant for decision making. The appeal proposal would not accord with the four criteria to meet the District's housing provision, and as such, the proposal would not accord with Core Strategy Policy CS2.

14. Although Core Strategy Policy CS 2 sets out the Council were to prepare a Land Allocations Development Plan Document (DPD) to include a review of the Green Belt boundary to ensure sufficient land is allocated to meet the District's housing requirements and manage its delivery, the DPD did not materialise. Even so, that does not translate into a development management tool to judge the appeal scheme's acceptability against as the words set out in the policy simply do not support that.
15. Due to my finding in respect of Core Strategy Policy CS 2, the proposal conflicts, in part, with CS 1(3) as it requires development to be considered in light of other policies within the Core Strategy and the Framework. Both need to be satisfied not just one. It is not unusual for development proposal's to both comply and conflict with policy. The proposal would, setting aside whether very special circumstances exist, conflict with the Council's spatial strategy.
16. Saying that, Core Strategy Policies CS1 and CS2 were adopted in 2009, before the first publication of the Framework in 2012. The Core Strategy was drafted to deliver a quantum of housing from the now partially revoked South East Plan, which was, in any event, a limited response to the area's true needs. The Core Strategy's approach to housing was also based on household projections from 2004. This led to a housing target of 188 dpa (dwellings per annum) which was a constraint led response rather than a response to an identified level of need. The South East Plan was not reviewed as intended. The Core Strategy did not review the Green Belt boundaries in the District, and the DPD did not happen. In all, the housing delivery target found in the Core Strategy is considerably out of date. The Council's witness in cross examination recognised that the 188dpa is only around a third of the current objectively assessed need (OAN) using the standard method, and that the boundary between Dorking and the surrounding Green Belt are substantively out of date.
17. In short, the development plan is based on a quantity of housing and need that is nearly twenty years old. Reviews to ascertain whether that need is or is not being met, and whether the spatial strategy responds to that, have not taken place. Whatever the final housing target is in the ELP, whether that be with Green Belt sites in or out, the evidence points to it being higher than the Core Strategy's, and that it will need to account for the District's constraints⁶. The ELP examined and subject of MM's also includes provision for a short-term review after three years. Therefore, although I have found conflict with Core Strategy Policies CS1(3) and CS2, limited harm would arise from that conflict, given that these policies are out-of-date and carry limited weight.

Openness

18. Openness has a visual and spatial aspect. The Framework confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
19. The appeal site is an 'L-shaped' parcel of land 8 hectares in size located next to the western edge of Dorking. The land is split into two by an established

⁶ CD3.8, Page 3 and CD2.1, Page 106 and ID8, Paragraph 46

hedgerow. Ground levels are uniform on the parcel of land closest to Westcott Road, but they rise considerably on the parcel of land to the rear of Sondes Farm/Sondes Place Farm, residential properties on Nower Road and West Bank and The Priory C of E School from west to east. Powell Corderoy Primary School is to the southeast of the appeal site. The school playing fields lie beyond the site's eastern boundary.

20. The school sites contain buildings up to four storeys in height and a large, indoor sports facility is at The Priory C of E School. Residential dwellings in the area are predominately two storeys high, through there is a range between single storey and three storeys high.
21. Within the appeal site the land is generally open, save for the hedgerow extending across the centre. Locally, a combination of landscaping, boundary treatments and development on three sides of the site affect that open character. However, the site provides a space between different urban characters, and it is viewed and perceived as an open rural parcel of land free from development. This is also evident from vantage points at The Nower or Ranmore Common, though the later in particular is a long-range view not just of the appeal site and its immediate surroundings, but of the wider landscape that includes the SHNL. From here, the site is nestled amongst existing trees and hedgerows and viewed next to the western fringe of Dorking, areas of woodland and below existing ridgelines with open fields in the foreground.
22. The existing avenue of Lime trees set within wide green verges on Westcott Road provides an attractive entrance/exit to Dorking. They would remain as a key visual characteristic of the area, though there would be visual and spatial loss of the rural context that lies beyond the trees and the hedgerow along Westcott Road. This would be from the introduction of large amounts of built form, albeit the extent of the development would not protrude beyond the existing limits to Dorking.
23. By keeping around 45% of the site open after development the proposal's visual effect would be lessened as not every part of the site would be consumed by dwellings and ancillary infrastructure such as roads, driveways, parking provision, boundary treatments, the drop off/pick up facility, the Gypsy and Traveller pitches and domestic paraphernalia. However, development would still inevitably be spread across the site, be grouped in blocks, rise above existing or planned landscaping or be visible through it when not in leaf. The open space, pathways and surface water attenuation would also have a different visual appearance and spatial function that would be read as being part of a housing development on the land, not an arable field. The visual and spatial effect would be felt nearby and from The Nower and Ranmore Common to different degrees. The land would be perceived to be part of the settlement of Dorking and not countryside on the edge of the settlement as it currently is.
24. I conclude that the proposal would result in a moderate loss of openness in the Green Belt and conflict would arise with Framework paragraph 137.

Purposes

25. The village of Westcott is to the west while the appeal site is contained by existing development to the north and south. Although the proposal would extend the western edge of Dorking towards Westcott, the extension would not go beyond the existing western point of Dorking, and thus, would not reduce the gap to Westcott, which is a village in any event. The coalescence of the

existing settlement of Dorking would not conflict with the second Green Belt purpose. The Council, as part of the ELP evidence base⁷, has considered the site to perform moderately in respect of merging, but my assessment is against the ordinary reading of the purpose set out in Framework paragraph 138. Hence, no conflict with the second purpose of the Green Belt would occur.

26. Nevertheless, the proposal would extend Dorking into the countryside beyond the current settlement boundary. The effect would be lessened by the development on three sides. But by infilling the arable land, which provides a countryside edge to Dorking, with a development of this scale and type, the organic edge of the settlement would become a straight and utilitarian boundary. Further, the land would be occupied by a considerable amount of housing and associated infrastructure, despite the retention of landscape features and new green infrastructure. In the round, the proposal would conflict with the first and third Green Belt purposes.
27. As outlined in the Built-Up Areas Character Appraisal⁸, Dorking *"sits in a valley below the Greensand Hills to the south and the chalk hills of the North Downs to the north. The viewpoints at Box Hill and Ranmore provide panoramic views over the town, with the spire of St Martin's Church being a prominent landmark in the heart of the town centre."*
28. Despite the site's geographic proximity to the settlement, the historic core and the character of Dorking cannot be understood from it. There are no views of the appeal site from the historic core of Dorking either, though glimpsed views of the appeal site can be obtained from parts of West Bank and Longfield Road. Hence, the special character of Dorking would be preserved.
29. The site provides a landscape setting to the edge of Dorking owing to its rural character which runs up to the existing extent of the settlement. Understanding of that is, however, affected by local topography, built form and landscaping. Other parcels of undeveloped land help break up the town's-built form, though there are some substantial and prominent buildings such as at The Priory C of E School. Although this is evident near to the site, it is the longer-range landscape views from The Nower and particularly Ranmore Common and how Dorking sits in those, that forms the underling characteristic of its setting. Both vantage points lie within the SHNL and thus the appeal site forms part of its setting, and in turn the landscape setting of the historic town of Dorking. I will consider the proposal's effect on the SHNL in a subsequent main issue. My findings here relate specifically to the setting of Dorking not the SHNL.
30. From Ranmore Common and The Nower, the site's arable use sits within scenic and panoramic views to and from the SHNL. Particularly, from several vantage points the development would be seen. But the development would sit below existing ridgelines, next to existing development and amongst a patchwork of woodland and established landscaping. Yes, the proposal would result in the loss of an open field, but other fields between Ranmore Common and the site would remain as would the school playing fields to the west of the site.
31. Although the non-designated heritage asset of Sondes Place Farm forms part of the fabric of views from Ranmore Common, it is understood along with the more recent built form on the edge of this part of Dorking, and the wider landscape setting to Dorking.

⁷ CD3.8, Page 153

⁸ CD2.3

32. The precise details of how the site could be developed are not before me, but I am satisfied that, the appeal site could be designed, laid out, developed, and landscaped in a manner that would not see the setting of Dorking materially change. As such, I consider that the proposal would preserve its setting and, on that basis, there would be no conflict with the fourth purpose.
33. For completeness, I agree with the main parties' view that the proposal would not conflict with the fifth purpose of the Green Belt.
34. In conclusion, the proposed development would conflict with the first and third purposes of including the land in the Green Belt for the reasons set out. Limited harm would arise in respect of both purposes, though the proposal would conflict with Framework paragraph 138, nonetheless.

Character and appearance

35. The appeal site is not within the SHNL, and it is not a valued landscape for the purposes of Framework paragraph 174 a), but it is within the setting of the SHNL. There is a visual connection between the site and the SHNL and vice versa which leads to an urban settlement within a rural context⁹. The SHNL extends across Surrey. It includes 13 local landscape character areas, and it has a varied character. Dorking has formed part of the setting of the SHNL since it was first designated, but the purpose of the SHNL designation is to conserve and enhance the natural beauty of the area¹⁰. I have a duty to have regard to this purpose in exercising or performing any functions in relation to, or so as to affect land in the SHNL.
36. Natural England has identified factors that assist with determining of presence/absence of natural beauty¹¹. The special qualities of the SHNL are not identified specifically in the Surrey Hills AONB Management Plan. Yet the SHNL is recognised as a strong wooded landscape which transmits a sense of remoteness and tranquillity within limited settlement and population.
37. Even if the term 'landscape qualities' used in the Council's Landscape and Visual Appraisal (LVA) is interchangeable with the term 'special qualities' used by the appellant, the Council's analysis of the factors that help with the identification of valued landscapes is based on their Local Landscape Character Area (LLCA) that draws upon land within the SHNL but also land that is not¹². As such, despite the interplay between the SHNL and land outside of it, this analysis is not wholly specific to the SHNL, and its special qualities. That said, there is some overlap with the appellant's analysis of issues that could affect the SHNL's special qualities. There are some common themes that feed into what could be the special qualities of the SHNL. These are: tranquillity, recreation function, the scenic quality of the elevated valley slopes, woodland or chalk grassland, and the remoteness (or perception of) from development.
38. The appeal site lies within the Wealden Greensand National Character Area (NCA) and the Tillingbourne and Pipp Brook Greensand Landscape Character Area (LCA). The LCA extends across the lower valley slopes between the ridgelines to the north and south. Here, as evident on the appeal site, there is open farmland with large and medium irregular fields bound by hedgerows and some hedgerow trees. The site's rural character is epitomised by its agricultural

⁹ CD2.3, Page 20

¹⁰ Section 82(1) of the Countryside and Rights of Way Act 2000 (as amended)

¹¹ Mrs Brockhurst Proof of Evidence, Paragraph 7.24

¹² Mr Harper Proof of Evidence, LVA, Figure 8

use and the hedgerows that line its boundaries and divide the two parcels of land. The site is the only open land that provides a rural country setting to the built form of Dorking on approach along the A25, but the nearby wooded hills, blocks of ancient woodlands and coppice, and the attractive tree lined road corridor of Westcott Road¹³ also influence. As such, the appeal site displays elements of the NCA and it is visible through vegetation from several nearby locations, whether that be along the site's boundaries, other land boundaries or from woodland. The vegetation screens views but the degree of screening varies during the year, and the site is viewed with the established settlement.

39. Higher slopes to the north and south within the SHNL broadly extend in an easterly and westerly direction. The site sits between these ridgelines on the valley floor, nestling amongst existing built form and landscaping that screens views to varying degrees depending on the location and time of year. The chalk scarp slopes and complex ridges to the north and south¹⁴ provide scenic and panoramic views of not just Dorking, but the wider landscape which comprises the SHNL and land outside of the SHNL. The site forms part of those views. The slopes within the SHNL, which include Ranmore Common, Box Hill and The Nower are characterised by a rural landscape, with woodland contributing to a sense of remoteness, tranquillity, and recreational opportunity. These areas are generally free from development. The appeal site's landscape character compliments the SHNL, and it sits between the existing urban area of Dorking that wraps around the site, and the site effectively functions as a rural transition between the settlement and the SHNL.
40. The appellant's LVA¹⁵ considers the LCA's have a high sensitivity, but the site itself and its context to have a medium sensitivity. However, the high sensitivity is directly influenced by the SHNL. On the other hand, the Council's LVA considers that the LLCA, which is based on land inside and outside of the SHNL, is of a medium-high landscape value and of high sensitivity. Clearly the appeal site holds landscape value, it is to what extent. Based on the evidence before me and my own observations of the site and the surrounding landscape, I prefer the appellant's judgement on landscape value.

The proposal's effect

41. Developing the site as proposed would change its character and appearance due to the large amounts of built form and associated infrastructure despite the landscaping and open space. It would expand the settlement and cause the coalescence of existing built form of different characters. The rural edge which characterises the transition in and out of Dorking would be lost. However, the tree lined Westcott Road would not be lost. Inevitably development would be seen through the avenue of Lime trees, but they and the alignment of the road mean that the focus would remain primarily of that attractive characteristic. Landscaping on the site only has the potential to help with upholding that corridor whether travelling in or out of Dorking.
42. The effect of the development would, notwithstanding the precise siting and layout of any buildings and landscaping, be felt locally from public footpaths or roads to the south and west¹⁶, albeit landscaping would still inhibit views to glimpses or in tandem with existing development to the south of the site.

¹³ CD2.4, Page 47

¹⁴ Albury to Ranmore Chalk Ridge LCA (north) and Leith Hill to Bury Hill Wooded Greensand Hills LCA (south)

¹⁵ CD4.9

¹⁶ Viewpoints 1i, ii, iii, iv, 2 and 11

43. Change arising from development is not synonymous with that equating to harm. However, the loss of the rural character to the edge of Dorking would cause harm to the character and appearance of the area despite the proposed open space and landscaping. That harm would be limited as reserved matters would provide opportunity for precise design and landscaping details to come forward having regard to the site's topography, Westcott Road, existing development and the school playing fields.
44. From The Nower and Ranmore Common, there would be a change from open, agricultural land to built form, but the site is next to the existing settlement in a low-lying position. The overall dominance of a green and scenic view would remain whether that is experienced from The Nower or along several points on Ranmore Common. The town of Dorking would continue to be part of those views, and the proposal would sit below established ridgelines with new tree cover. Detailed designs of the scheme could help assimilate the proposal into the landscape, and given this, the depth of views from The Nower or Ranmore Common would not be affected as a result. There would also likely be increased opportunity to appreciate the SHNL from within the appeal site.
45. The proposal could add to light pollution in the area, but sensitive design and details could be secured by planning condition. Considering the intended green infrastructure and with light pollution already part of the SHNL's setting, no material harm or adverse effects would be created on the setting of the SHNL.
46. For the reasons set out and bearing in mind the purpose set out in Section 85(1) of the Countryside and Rights of Way Act 2000 (as amended) (CROW Act) does not contain an absolute against development, the proposal would not adversely affect the SHNL or its setting. However, even if I were to find that there was some harm to the setting of the SHNL, the proposal could mitigate its negative effects as far as possible on the appeal site to minimise its adverse impacts and conserve the SHNL in line with Framework paragraph 176.
47. I recognise that the site is part of the draft site allocations in the ELP and that there is an evidence base supporting that plan, but I have considered the effects of the proposal, which would be for a greater quantum of development than envisaged by the Council, on its own merits. While the Council's landscape witness accepted in cross examination that the site could accommodate 144 homes without unacceptable impacts either on landscape character or the SHNL subject to questions of detailed design, I have reached my own view.

Conclusion of the main issue

48. The proposed development would conflict with Core Strategy Policies CS 13 (1) and CS 14 and saved Policies ENV4, ENV22 and ENV23 of the Local Plan 2000 (Local Plan) as it would not respect or enhance the character and distinctiveness of the landscape character area in which it is proposed. Careful siting, design and landscaping would lessen the proposal's impact but not entirely avoid it even though making best use of the land available. Conflict would also occur with Framework paragraphs 130 c) and 174 b) in this respect.
49. However, the proposal would accord with Core Strategy Policy CS 13 (2) as the natural beauty of the SHNL landscape would be conserved, having regard to ridgelines, significant views, peace, tranquillity and levels of artificial light. The proposal would also accord with Framework paragraphs 130 c) and 176 as development could come forward whilst being sensitively located within the setting of the SHNL and designed to avoid or minimise adverse impacts on the

designated area. Thus, the proposal would accord with Section 85(1) of the CROW Act.

Housing supply

Housing requirement

50. The Core Strategy is more than five years old, and its policies have not been reviewed. Hence, Framework paragraph 74 confirms that the Council should identify a minimum of five years' worth of housing against their housing requirement against their local housing need (LHN). Against the agreed base period, and using the LHN figure, the main parties agree that there is a shortfall below the minimum five years. The appellant says a supply of 2.75 years or 1,517 dwellings can be demonstrated, whereas the Council says a supply of 3.74 years or 2,062 dwellings can be shown.
51. Despite the clear direction provided by the Framework, the Council advocate five other scenarios to base the Council's housing requirement on. The Council say that all five have greater merit than using the LHN (scenario 2) in this case as they are more up to date. The Council also contends that the LHN is not fit for purpose as the 2014 household projections have inflated housing growth compared to subsequent projections and the 2021 census.
52. Scenario 1 is based on the 2021 census. Scenario 1a is an amended target based on the same census but includes concealed households which have arisen from past under delivery. Scenario 3 uses the 2018 based household projections to inform the LHN. Scenario 4 is the proposed housing target from the ELP (Green Belt sites in). Scenario 5 is a housing target based on the ELP but with Green Belt sites out. In order of preference, the Council consider scenarios 4 and 5 are of equal standing, before scenarios 3, 1a, 1 and 2 (LHN).
53. Fundamentally, determining what the appropriate housing target is, is a matter for the plan-making process not the decision-making process. Setting that principle to one side, only scenario 2 draws support from the Framework. Yet, the Council rely on the VIP Trading¹⁷ and Clacton on Sea¹⁸ decisions as reasons why a decision maker could depart from the approach in Framework paragraph 74, and use a housing requirement figure from an emerging, but not adopted strategic policy instead of the LHN calculated using in the standard method.
54. In the VIP trading decision, the revised housing target set by Policy H1 of the then draft London Plan was given significant weight as it was not to be modified following EiP, and used for the basis of assessing whether a five-year supply could be demonstrated. The Inspector, in the Clacton on Sea decision, considered the recently found sound emerging plan and its imminent progress to adoption to be a very important material consideration and applied weight to its housing target in accordance with Framework paragraph 48.
55. However, the circumstances in which those decisions were taken are not directly comparable to the situation here and scenarios 1, 1a and 3. They are all not housing targets which form part of the ELP or any other plan, they do not set the strategic direction for a plan, nor have they been subject of EiP. The Planning Practice Guidance (the Guidance) is also clear that the 2014 household projections are to be used¹⁹. In any event, the number of houses in

¹⁷ CD15.2

¹⁸ CD14.11

¹⁹ Paragraph ID: 2a-005-20190220

scenarios 1, 1a and 3 is considerably below the housing target in the ELP (Green Belt sites in), which is, notwithstanding the merits of this plan's soundness, not a full response to the Council's OAN for reasons relating to the District's constraints²⁰, and based on the Council's own evidence. Furthermore, scenarios 1 and 3 are below the Council's housing target for an ELP with Green Belt sites out. Therefore, even if I were to depart from the clear binary approach of Framework paragraph 74, scenarios 1, 1a and 3 would not appear to respond to the Council's own evidence around the need for housing.

56. The housing target in scenario 4 (ELP Green Belt sites in) was reduced down from 353 dpa (submission version) to 340 dpa as a result of the EiP. That target also accounts for past under delivery in the first three years of the plan period and looks to address this in the first five years. In scenario 5 (ELP Green Belt sites out), the annual housing target is 270 dpa.
57. For either scenario 4 or 5 the Council assert that the strategy set by emerging Policies S1 and H1 would not change, save for the housing target. This may be correct, but the pause and subsequent direction of the ELP is unclear. Due to the extent of unknowns surrounding the ELP's strategic issues and its evidence base, I am not satisfied that scenario 5 provides a firm footing at present to assesses the District's deliverable housing supply against.
58. That leaves scenario 4. If Green Belt sites are to remain in, the ELP could swiftly progress to adoption given MM's have been published. In normal plan making circumstances the Council may be right to say that significant weight should be given to ELP Policy H1. But doing so would ignore the pause to the ELP and its uncertain direction of travel potentially until a new version of the Framework is published, with a range of potential unknowns relating to the ELP with additional MM's (Green Belt sites out) flowing from that. This means that the circumstances here are not directly comparable to those in the VIP Trading or Clacton on Sea decisions.
59. It is my considered view that the housing requirement figure in ELP Policy H1(1) carries limited weight; a judgement also expressed by the Council's planning witness in cross examination. Using this figure would result in a 4.79 year supply on the Council's case or a 3.52 year supply on the appellant's case.
60. Nonetheless, given the current circumstances and uncertainty, the clarity offered by the LHN calculated by the standard method as advised by Framework paragraph 74 is to be preferred even if I were to disregard the clear binary approach that this paragraph sets²¹.

Housing Delivery Test

61. The Housing Delivery Test (HDT) is a backward-looking tool and the last version of the HDT was in 2021. However, it is the current decision-making framework despite the Council's opinion that it should carry no weight. The HDT cannot simply be disregarded based on the Council's views about its merit. Notably the consultation draft Framework did not propose to remove it nor could either party point to any appeal decision whether made by an Inspector or Secretary of State whereby the HDT has been given no weight.
62. In the last HDT result the Council was delivering 70% of its requirement. The

²⁰ ID8, Paragraph 46

²¹ East Riding of Yorkshire Council v Secretary of State for Levelling Up, Housing and Communities [2021] EWHC 3271 (Admin)

Council's witness accepted that the Council had never passed the HDT and that the delivery of housing in the District had deteriorated since the last HDT. Furthermore, a comparison²² of neighbouring Surrey local planning authorities which have a similar or higher percentage of land in the Green Belt, shows that this is not necessarily a barrier to a satisfactory HDT result and therefore avoiding an associated consequence.

Deliverable supply

63. Against the agreed five-year period of 1 April 2023 to 31 March 2028, the supply dispute relates to ELP draft allocation sites which do not require Green Belt boundary changes. These sites would potentially deliver a mix of market and affordable homes.
64. Of the 276 dwellings that the Council say are deliverable at Pixham End, the appellant agrees that there is evidence to include 175 of these. Recent applications have resulted in more than 175 dwellings being granted permission, but the Council's delivery rate of 69 dwellings per year is not evidenced. Adopting the appellant's more realistic delivery rate of 50 dwellings per annum, I consider that 175 dwellings could be delivered with 25 in 2024/25, and 50 per year in 2025/26, 2026/27 and 2027/28.
65. The site at Ermyn House becomes available in October 2026, though it is being marketed for offices with a medium to long term lease. This could be to demonstrate that the office space is no longer required, but the existing building would need to be demolished and a developer lined up before works could start. As such, there is not clear evidence to support any completions in 26/27, nor the 70 dwellings potentially completed in 27/28. That said, there is a fair chance that 25 dwellings could be completed by the end of March 2028 applying the appellant's broad brush industry standard for half a year.
66. Given the scale of development at Friday Street and the Council's resolution to grant planning permission for 23 dwellings, I consider that there is, despite the prolonged s106 negotiations, a good chance that up to 26 dwellings could be delivered here. I do not consider that there is enough clear evidence to support the 6 dwellings at Cricketers Close due to the concerns raised about odour and ecology in relation to a scheme for 4 dwellings that is current awaiting a decision. However, given the scale of development, there is sufficient time for the concerns raised about the 4 dwellings to be overcome and the dwellings delivered by the end of March 2028.
67. Following the dismissed appeal at South House²³, pre-application discussions have taken place with a revised application likely. There may be differences between the Council and landowner on capacity, but a view was expressed in the appeal decision that the harms could be overcome. Given this, and as the s106 was agreed for a scheme with a higher number of dwellings, there is enough evidence that the completions suggested by the Council will happen.
68. The South House appeal decision held that the land at Murreys Court did not meet the definition of deliverable. A planning application has since been submitted for a combination of 60 assisted living units and a 66 bed care home. The outcome of that application is unclear, and the quantum of development is considerably above the Council's suggestion, nor is it clear

²² ID5

²³ CD14.7

what, if any, bearing they may have on the delivery of 29 dwellings suggested. As such, there is not enough clear evidence to include this site.

69. Of the other sites, some or all of them may come forward and yield housing completions before the end of March 2028 as the Council suggest. I do not discount the Council's local knowledge and experience. But, based on current evidence, despite the ongoing discussions and likely planning applications, there is not enough clear evidence²⁴ in terms of the developer's delivery intentions, anticipated start and build-out rates to support their inclusion in the housing land supply total. There are also issues to resolve around the height of the scheme at Regent House in relation to the SHNL and the Area of Great Landscape Value; and whether the hospital will remain operational or not and the site's capacity. I accept that there is a realistic prospect of works starting at Bull Hill, but there is not enough clear evidence that dwellings will be delivered before the end of March 2028 despite the land being owned by the Council and there being a joint venture partnership. The delivery rates are speculative and if flats are to be built, then the whole scheme would need to be delivered before dwellings could be occupied. Therefore, the site's inclusion at the current time is not supported by clear evidence.

Conclusion on the extent of the supply

70. Whilst a snapshot in time, it seems to me that Mole Valley's current supply of deliverable housing sites based on LHN (scenario 2) lies somewhere between the two figures presented to me but far closer to the appellant's figure than the Council's. Based on my findings on the disputed sites, there would be a supply of around 2.9 years or 1,602 dwellings. This would be a shortfall of roughly 1,152 dwellings against the LHN figure.
71. While scenario 4 is not to be preferred, it carries limited weight. So, applying my findings on the disputed sites to this scenario, there would be a supply of approximately 3.7 years which would be a shortfall of about 551 dwellings. I am mindful that scenario 4 measures a housing target with Green Belt sites in against a supply with Green Belt sites out, but that is the agreed approach to assessing the supply, and there is no analysis before me about whether sites within the Green Belt are deliverable or not. Although logic suggests there may be a boost to the Council's supply if the ELP were to be adopted with Green Belt sites in, there is no substantive evidence to support that or to what extent. Therefore, my findings are based on the parties agreed approach to assessing the supply.
72. The outcome of my findings on the disputed sites also affects the number of affordable homes that form part of the five-year supply. Using my findings and the Council's affordable housing delivery figures²⁵, 50 further affordable homes could, at best, form part of that supply. This figure should be added to the agreed figure of 65 affordable homes that already forms part of that supply, taking the total affordable housing supply to around 115 dwellings or 23 dpa.

Planning obligations

73. Framework paragraph 57 and Regulation 122 of the CIL Regulations confirm that planning obligations must only be sought where they meet each of the following three tests: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably

²⁴ Regent House, Leatherhead Hospital and Elmers Field

²⁵ ID6, Table 1

related in scale and kind to the development.

74. The s106 agreement would secure financial contributions towards the highway improvement schemes, a demand responsive bus service, car club vehicles and spaces, a travel plan monitoring fee, and a TRO. The s106 agreement also includes mechanisms to secure the delivery of affordable housing, a travel plan, highway works, on-site public open space with children's play area and Gypsy and Traveller pitches along with subsequent management and maintenance arrangements for the public open space and Gypsy and Traveller pitches.
75. The proposal would increase vehicular and other transport movements to and from the appeal site. Core Strategy Policy CS 18 explains that all new housing and commercial development will be subject to the development tariff, a component of which will be directed towards enhanced public transport, promotion of more sustainable transport choices and to support improvements in the range of transport options and accessibility to services and facilities by means other than the private car. The policy seeks to encourage a modal shift away from the private car, but the evidence to support the highway improvement scheme, demand responsive bus service and car club vehicles and spaces still needs to satisfy the three tests.
76. A contribution of £172,800 is sought for Copenhagen style crossings at the junctions where Westcott Road with Nutcombe Lane and Drill Hall Road, and to modify the existing signalised junction at Westcott Road/Drill Hall Road. This is to encourage modal shift and promote sustainable modes of travel to/from the appeal site to the town centre and its train stations by providing level, priority access to users in these locations. The improvements seek to add to and extend the accessibility and safety improvements proposed by the appellant along Westcott Road near to the site. The existing shared foot and cycleway would be used but priority access at the junctions would be extended much closer to the town centre. Westcott Road is a busy road that can be congested along with Vincent Lane. There is little resilience left at this junction. While the obligation would not remove every possible car journey, it would encourage modes of transport other than the car and for those movements to be safe and given priority, I consider that the obligation satisfies the three tests.
77. Surrey County Council, in partnership with the Council have recently launched the Mole Valley Connect DDRT bus service. This flexible service provides passengers with a range of destinations within an agreed travel zone, offering links to the railway stations, local shops and GP's. People book journeys using an app, online or via on the telephone. The DDRT runs alongside the timetabled range of bus services available from two sets of bus stops a short walk from the site. These offer connections to various destinations, including train stations for onward journeys across the week. Improvements to the existing bus stop are already proposed along with pedestrian and cycle connections along Westcott Road. As such, given the site's location next to Dorking, I do not consider a contribution to the DDRT, which is primarily aimed at semi-rural and rural locations, to be necessary or directly related to the proposed development on the evidence before me.
78. The Council assert that the provision of electric vehicle car club spaces and vehicles will increase the use of sustainable modes of travel, reduce the reliance on the private motor vehicle, reduce congestion and improve air quality. That evidence is not, however, specific to the effects of the proposed development. There is already a car club with one vehicle a 10-to-15-minute

walk from the appeal site. A further car club vehicle is stationed near to the Council offices around 30 minutes away, and anecdotally well used. However, there is no substantive evidence about the availability of either existing car club vehicle or whether there are barriers such as their location that affect its use to know whether further provision is necessary on the appeal site. Accordingly, I am not satisfied that the contribution would be directly related to the development and be of scale and kind to it.

79. The s106 agreement requires an indemnity to be provided with the initial funding arrangements for the management company that is to be set up to repair, maintain and renew the public open space and the children's play area. The indemnity would cover the first five years of maintenance should the management company default, so that the open space is managed, maintained and establishes. It is a failsafe, but the Council would be able to satisfy itself of the management company's funding arrangements for the initial period. While matters can change, there are enforcement powers under s106 of the Act should the management company default. Thus, the indemnity provision is not necessary to make the development acceptable in planning terms. Therefore, I have not taken it into account in reaching my decision.
80. For the reasons set out above, the obligations in respect of the demand responsive bus service, car club vehicles/spaces and the indemnity do not satisfy the tests set out in Framework paragraph 57 and in CIL Regulation 122. I am therefore unable to take them into account in determining this appeal. I conclude, however, that the remaining obligations that would be secured through the s106 agreement would meet the statutory tests and as such, they are material considerations in this appeal. Hence, the proposal would not conflict with Core Strategy Policies CS 4, 18 and saved Local Plan Policy MOV2.

Other considerations

Sustainable location

81. The site is a sustainable location due to its proximity to Dorking and the facilities and services it offers which could be reached by a range of travel modes. Siting development in sustainable locations is the fundamental thrust of national and local policy, but in Mole Valley there is a tension between protecting the environment, delivering against its needs and doing so in sustainable locations. While it is unclear which version of the ELP the Council will progress, I give limited positive weight to the site's sustainable location despite the scheme's conflict with the spatial strategy and the site's Green Belt location. My finding here is reinforced by the highway improvement works that the s106 agreement would secure that would benefit the wider population also.

Market housing

82. The proposed market dwellings would help boost the Council's supply of market homes through a mix of units next to Dorking, which offers accessible facilities and services. The shortfall against the minimum level of supply to be very substantial (LHN) or considerable (scenario 4).
83. Despite the Council's view about the HDT, the delivery of housing has not improved since the last HDT result in which the Council was delivering 70% of its requirement. The Housing Delivery Test Action Plan may yield change but the shortfalls in housing land supply against either the LHN or scenario 4 are serious even if the ELP has increased supply already despite it not being adopted. In any event, the ELP has been paused and its future direction is

unclear. The timeline for the ELP is far more uncertain if all the Green Belt site allocations are removed from the ELP and I doubt the Council's timeline.

84. Not delivering enough houses affects people whether that be in their availability, cost, affordability or the bearing that all three have on people being pressed into staying in unsuitable accommodation for their current or even future needs. The Framework seeks to significantly boost the supply of homes. I consider that the provision of market housing should carry very substantial weight in this case. That level of weight applies to the position using the LHN, but also scenario 4 should I be wrong about using the LHN as that shortfall is still well below the minimum five-year supply and the housing would deliver social benefits/significantly boost housing supply.

Affordable housing

85. Compared to the Core Strategy Policy CS4 target a shortfall of 234 affordable homes has arisen across the current development plan period. The most recent evidence of need²⁶ points to an increased need for affordable homes (143 dpa). However, in the last three years alone, there has been a shortfall of 396 affordable homes due to the delivery of only 33 dpa in those years.
86. To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to be substantially below that level of delivery. This will mean the existing shortfall will only become worse.
87. The ELP is said by the Council to be grounds for optimism in turning the tide, but even if every single site in the ELP, whether that be with Green Belt sites in or out, delivered 40% affordable homes, the identified need would not be met. So, while there may be an uptick in delivery after the ELP is adopted, it will not be enough to satisfy people who need such housing now. In practice, not every site may deliver affordable homes at 40%, so the picture may not be as positive as the Council suggests.
88. The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children's education and development. In Mole Valley the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.
89. The proposal would deliver up to 72 affordable homes with a suitable tenure split, which exceeds the 40% on site provision that Core Strategy Policy CS 4 requires. The s106 agreement secures the provision and tenure split. The affordable homes would make a sizeable contribution to addressing the acute and long-established shortfall which will not be fully addressed in the short term. I give the affordable housing provision very substantial positive weight.

Gypsy and Traveller pitches

90. The provision of 0.2 hectares on land could accommodate at least three Gypsy and Traveller pitches would help towards meeting the identified need demonstrated in the Council's evidence base for the ELP. This is consistent with ELP Policy DS24. I recognise the pause to the ELP and the uncertain future of

²⁶ Strategic Housing Market Assessment Update (SHMA), December 2020

including the appeal site as an allocation, but the evidenced need means that I give this provision significant positive weight.

School drop off/pick facility

91. A parking and pickup/drop off facility for the Priory C of E School forms part of the proposal. Due to the location of the school, neighbouring residential development and the existing road network, the appeal site offers the only location where this could be delivered. Although the Highway Authority is looking to encourage a shift away from private cars for school related journeys, there will probably always be some element of private car use. The locations from which pupils attend the school also means that coaches are likely to continue to operate. The proposed provision, subject to details, offers the potential for a safe facility to be created along with a pedestrian connection to the school. There may be knock on effects for the movement of vehicles on the local highway network with vehicular access solely from Westcott Road, but there is no Highway Authority objection in this case. I consider that the parking and pickup/drop off facility carries moderate positive weight.

Biodiversity net gain

92. The appeal scheme would deliver an on-site biodiversity net gain (BNG) of over 20%. This would be a measurable gain in the context of Framework paragraph 179a), but it is also a figure that goes beyond requirements of 10% and 20% as sought by The Environment Act 2021 and ELP Policy EN9 which provide a forward direction of travel to measure BNG against. The BNG proposed could be secured through planning conditions and the s106 agreement. Given that the BNG goes beyond both forward looking figures, it is a measurable gain that attracts significant positive weight.

Green infrastructure

93. It is common ground that the appeal scheme would provide in excess of 3.5 hectares of newly accessible green infrastructure, including open space and a play area. ELP Policy DS24 seeks the provision of all these matters, though that policy attracts limited weight due to the unknown direction that the ELP will go. The green infrastructure would mitigate the development's effects and likely include elements of good design, but it would also plausibly be used by the wider population also and connect Westcott Road to West Bank, the Priory C of E school and The Nower for example. The existing route to the west of the appeal site from Westcott Road to Milton Heath and The Nower would remain, but the proposed green infrastructure would be a closer alternative to many. I therefore attach moderate positive weight to the green infrastructure proposed, which would be secured through planning conditions and the s106 agreement.

Economy

94. Economically, the proposal would lead to the creation of between 336 and 436 direct, indirect and induced jobs. It is also envisaged that future occupants would add around £4 million per year to the local economy. I do not consider, in the context of Framework paragraph 81, that these benefits are of limited weight. They stem from the proposal and carry significant weight in my view as there would be short-and long-term contributions to the economy.

ELP Policy DS24

95. For the reasons outlined above, the current pause to the ELP and its future direction of travel lead me to attach limited weight to ELP Policy DS24. Even

so, the proposal would not, subject to details at reserved matters along with the imposition of planning conditions and the s106 agreement, conflict with it. This is, however, a matter of neutral weight in the planning balance.

Other Matters

Sondes Place Farm – a non-designated heritage asset

96. Sondes Place Farm, to the east of the site, is a good example of a model farm complex with associated farmhouse dating from the 19th century that were architect designed rather than built in the local vernacular style. The aim was to support the development of agricultural technology and improve welfare standards of farm workers. The buildings have been converted to residential use, but they are complete and hold architectural and historical significance.
97. The proposal would alter the rural setting afforded by the two fields to the model farm. However, the appeal scheme could be designed to lessen that change through landscaping, the placement and design of the open space and the siting of the dwellings. This leads me to consider that the scale of harm to the significance of Sondes Place Farm would be low. Balanced against this are numerous benefits associated with the scheme which I have outlined above. In my judgement when I consider the scale of harm identified against these, the balance is firmly in favour of the appeal scheme.

Points raised by interested parties

98. It is likely that residents would experience dust, noise, vibration and disruption in connection with the proposal, but these would be relatively short-term effects and a planning condition could be imposed to secure a construction management plan to limit these effects. There would be a change to existing neighbouring residents' privacy and outlook, but I am content that these effects could be made satisfactory at the detailed design stage. Despite the localised congestion experienced in Dorking, the Council's Environmental Health Officer did not raise any objections about the effect of air quality or light pollution arising from the proposal. Subject to planning conditions relating to the construction phase and lighting, I agree.
99. Surveys set out the site's ecological baseline and include recommendations. Existing trees and hedgerows are to be retained and a suitably designed landscape strategy for the site including sustainable urban drainage could come forward at reserved matters stage. Given this, and the imposition of planning conditions to secure a sensitive lighting management plan, a landscape and ecological management plan, a construction and ecology management plan and an updated bat surveys and mitigation strategy, I agree with the Surrey Wildlife Trust that the proposal would be acceptable in biodiversity terms.
100. I consider that the proposed means of access would be acceptable subject to the imposition of planning conditions. I also agree with the Highway Authority that the proposed development would not lead to a significant increase in vehicular trips on the surrounding highway network. I understand that a solution to remedy the existing localised congestion at the junction of Westcott Road and Vincent Lane has not been found. The extra number of vehicles on the highway and at that junction may mean journeys take a little longer, but the site's location and accessibility to a range of facilities and services, including multiple public transport options, means that future occupants would not be reliant on the private car. The evidence before me indicates that the proposal would not have an unacceptable effect on the operation of the local

highway network or the safety of its users, and subject to the imposition of planning conditions and the s106 agreement, the residual cumulative impacts on the road network would not be severe having regard to Framework paragraph 111. There would not consequently be conflict with ELP Policy S4.

101. Although it is suggested that local infrastructure such as doctors and schools are already full, this is not supported by substantive evidence and no planning obligations are sought to mitigate the proposal's effects on these facilities.
102. The appeal site lies in Flood Zone 1. No objections have been raised by the Lead Local Flood Authority and the Environment Agency subject to planning conditions being imposed so that surface water drainage details are considered at reserved matters stage. These details will include consideration of the proposed sustainable urban drainage system and its interaction with the existing environment so that there is no increased risk of flooding in the area.
103. The proposal would mean that the appeal site could no longer be used for arable farming, and in the wider context of seeking to minimise food imports, reducing associated carbon emissions, and being self-sustaining as a country, the proposal would not assist. There may also be an indirect effect as the site is partially used by local primary school pupils to plant vegetables before the main crop is planted. However, stepping back, the appeal site is relatively modest in size, it is not best and most versatile agricultural land, and the education benefit could be delivered in another manner by the school. The loss of the appeal site for farming, whilst regrettable needs to be balanced against the scheme's benefits. There is no evidence, despite the assertion, to support a view that the proposal will increase local temperatures on its own.
104. The site may currently offer a rural edge to Dorking that residents resonate with their wellbeing. The proposal would change that relationship, but residents would still have a range of good quality outdoor spaces and routes that they can enjoy for their wellbeing.
105. Brownfield land may or may not be available in the local area, but I have considered this appeal on its own planning merits and the only way that the site would not be in the Green Belt would be through the ELP or another plan in the future. The Council also raise points about the appeal scheme 'pre-empting' the outcome of the consultation draft of the Framework²⁷ and thus the ELP. However, the Council has not advanced a case on prematurity with regards to Framework paragraphs 49 and 50.

Planning Balance

106. The proposal is inappropriate development which is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. There would also be moderate harm to the openness of the Green Belt and with limited harm to two of the purposes of including the land within it. Nevertheless, the totality of Green Belt harm attracts substantial weight. Very special circumstances will not exist unless the harm to the Green Belt and any other harm is clearly outweighed by other considerations.
107. I have identified limited harm with the Council's spatial strategy and the character and appearance of the area, though that harm is localised and does not extend to the setting of the SHNL or the SHNL itself. Hence, the proposal

²⁷ CD1.5

would conflict with Core Strategy Policies CS 2, CS 13 (1) and CS 14 and saved Policies ENV4, ENV22 and ENV23. But no conflict would arise with Core Strategy Policy CS 13 (2). The s106 agreement secures contributions required by Core Strategy Policies CS 4, 18 and saved Local Plan Policy MOV2. Some of obligations would provide the local community with affordable homes and Gypsy and Traveller pitches together with access, recreation, leisure and wellbeing benefits that weigh in favour of the appeal scheme. The remaining contributions would mitigate the effect of the development, so they do not weigh in favour or against the proposal.

108. I consider that all the other considerations clearly outweigh the harm that I have identified. Hence, the very special circumstances necessary to justify the development do exist and I conclude the proposal would accord with Core Strategy Policy CS 1 (3) in respect of the Green Belt. That would also mean, as the appellant suggests, that the proposal would accord with the development plan as a whole despite the scheme's conflict with the spatial strategy.
109. However, on the Council's interpretation of Core Strategy Policy CS 1(3), even if the provisions of national policy relating to Green Belt are satisfied, there would still be conflict with this policy due to the scheme's conflict with the District's spatial strategy, and by extension the character and appearance of the area. On the Council's case, this would lead to a conclusion that the proposal would conflict with the development plan as a whole. Yet the development plan policies that I have found conflict with are the most important policies in this case²⁸. The application of footnote 8 concerning housing land supply and the HDT mean that the decision-making process set out in Framework paragraph 11 d) is to be applied.
110. There are no policies in the Framework that protect areas or assets of particular importance which provide a clear reason for refusing the development proposed. Applying the tilted balance, the proposed development would result in benefits, but also cause harm. However, I conclude that the adverse impacts of granting permission would not significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. As a result, even applying Core Strategy Policy CS 1 (3) as the Council interprets, there are material considerations in this case that indicate that this decision should be made otherwise than in accordance with the development plan.
111. Therefore, I conclude, on either approach, that the appeal should be allowed subject to the conditions set out below.

Conditions

112. In imposing planning conditions, I am mindful of the six tests in Framework paragraph 55. Beyond the standard condition [1], I have imposed a plans condition and a condition concerning existing and proposed ground levels, proposed ground floor slab level of each building, and the finished levels of any access road and driveway, in the interests of certainty and the character and appearance of the area [3 and 5].
113. In the interests of archaeology, a condition is needed for archaeological investigation and recording [6]. To ensure that the construction of the development does not bring about adverse impacts in terms of ecology,

²⁸ CS 1, CS 2, CS 13, CS 14, ENV22 and ENV23 – agreed by Ms Munnis and Mr Ross, plus ENV4

highway safety and the amenities of the area, conditions to secure a construction transport management plan and a construction and ecology management plan are necessary [9 and 12].

114. To encourage means of transportation other than the private car, a travel plan condition is necessary [4]. So that the appeal site can be accessed safely from Westcott Road, and the continued operation of the surrounding highway network, a condition is necessary to ensure the approved access details are constructed and visibility zones kept permanently clear of obstruction over 0.6m high [8]. To help address the effects of climate change, a condition is necessary [13] to secure details of measures to reduce carbon emissions of the predicted energy use for each dwelling by at least 10%.
115. In the interests of flood prevention, pollution control and environmental protection, conditions are necessary to secure surface water drainage details and a subsequent verification report [7 and 14]. To protect bats and ensure suitable habitats, a condition is necessary to secure an updated bat roost survey report and final bat mitigation strategy [2]. In the interests of biodiversity, including its future management and maintenance, conditions are necessary for a sensitive lighting management plan and a landscape and ecological management plan [10 and 11]. The former condition is also necessary in the interests of the character and appearance of the area.

Conclusion

116. For the reasons given above, I conclude that the appeal should be allowed.

Andrew McGlone

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Zack Simons and Kimberley Ziya	Counsel, instructed by Adam Ross of Nexus Planning
They called:	
Clare Brockhurst FLI BSc (Hons), Dip LA	Director, Leyton Place Limited
Dominick Veasey BA (Hons), DipTP, MRTPI	Head of Research and Analytics, Gleeson Land
Annie Gingell BSc (Hons), MSc, MRTPI	Associate, Tetlow King Planning
Adam Ross BA (Hons), DipTP, MRTPI	Director, Nexus Planning
David Earl *	Associate, iTransport
James Smith *	Principal at James Smith Planning Law Services

FOR THE LOCAL PLANNING AUTHORITY:

Jack Parker	Counsel, instructed by Melissa Clarke, Deputy Development Manager and Solicitor, Mole Valley District Council
He called:	
Sherelle Munnis BA (Hons) MRTPI	Deputy Development Manager, Mole Valley District Council
Duncan Clarke BSc (Hons), MA, MA, MRTPI	Planning Policy Manager, Mole Valley District Council
Nick Harper BA(Hons), DipLA (Hons) CMLI	Partner, Harper Landscape Architecture LLP
James Lehane *	Principal Transport Development Planning Officer, Surrey County Council
Tom Penlington *	Legal Services Manager and Solicitor, Mole Valley District Council

* Participated in the Planning Obligation session only.

INTERESTED PARTIES:

Ken Hollis
Steve McDonald
Jackie Macey
Chris Cook
Lisa Scott
Councillor Watson, Surrey County Council

INQUIRY DOCUMENTS

- ID1 Appellant Opening Statement and Appearances
- ID2 Council Opening Statement and Appearances
- ID3 Errata, Miss Gingell Proof of Evidence
- ID4 Mr Clarke Updated Affordable Housing Table
- ID5 Surrey Local Planning Authorities' Housing Delivery Test Results 2018 - 2021
- ID6 Housing Land Supply Roundtable Note
- ID7 Council Closing Submissions
- ID8 Appellant Closing Submissions

CORE DOCUMENTS

Found in the List of Core Documents, dated 30 October 2023.

SCHEDULE OF CONDITIONS

- 1) Approval of details of access (other than shown on plan reference ITB12131-GA-019 Rev D), the layout, scale, external appearance of the buildings, and the landscaping of the site (hereinafter called the 'reserved matters') shall be obtained from the Local Planning Authority in writing before any development is commenced and carried out as approved. Plans and particulars of the reserved matters referred to above, shall be submitted in writing to the Local Planning Authority before the expiration of three years from the date of this permission. The development hereby permitted shall be begun before the expiration of two years from the date of approval of the last of the reserved matters to be approved.
- 2) Reserved Matters applications that are influenced by trees 1, 3 and 17 as shown on Figure A11.1 Bat Tree Roost Plan of the Ecological Impact Assessment (EAD Ecology, May 2023) shall be accompanied by an updated bat roost survey report and final bat mitigation strategy to be approved in writing by the Local Planning Authority. The survey report and mitigation strategy shall be in line with the Response to Surrey Wildlife Trust Ecology Planning Advice Service (EAD Ecology, May 2023) and Ecological Impact Assessment (EAD Ecology, January 2023). The update bat roost surveys, to include preliminary ground level tree roost assessments and bat presence/likely absence surveys, must be carried out in line with good practice guidelines.

Compliance

- 3) The development hereby permitted shall be carried out in accordance with the following approved plan numbers 1158.01 'Site Location Plan', 1158.03 'Parameters Plan' and ITB12131-GA-019 Rev D.
- 4) The details within the approved Travel Plan, dated 22 May 2023, Revision C, shall be implemented upon first occupation of the development and thereafter shall be maintained and developed to the satisfaction of the Local Planning Authority.

Pre-commencement

- 5) No development shall take place until details of the existing ground levels of the site, the proposed finished levels of the ground, the ground floor slab level of each building, and the finished levels of any access road and driveway showing their relationship with the existing levels of the immediately adjoining land and buildings, have been submitted to and approved, in writing, by the Local Planning Authority. The development shall be carried out in accordance with the approved levels.
- 6) No development shall take place until a programme of archaeological work, to be conducted in accordance with a written scheme of investigation (WSI) has been carried out. The WSI shall comprise a programme of geophysical survey followed by a trial trench evaluation and shall be submitted to and approved, in writing, by the Local Planning Authority.
- 7) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in

writing by the Local Planning Authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

- a) the results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
- b) evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep, during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off
- c) detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.
- d) a plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
- e) details of drainage management responsibilities and maintenance regimes for the drainage system.
- f) details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Thereafter the drainage scheme shall be implemented in accordance with the approved details.

- 8) No works shall commence on-site unless and until the access to Westcott Road hereby approved has been constructed to base course level and provided with visibility zones in accordance with the approved plans, Drawing No. ITB12131-GA-019 Rev D, and thereafter the visibility zones shall be kept permanently clear of any obstruction over 0.6m high. The access shall then be constructed in accordance with the approved plans prior to the first dwelling being occupied.
- 9) No development shall commence until a Construction Transport Management Plan, to include details of:
 - a) parking for vehicles of site personnel, operatives and visitors
 - b) loading and unloading of plant and materials
 - c) storage of plant and materials
 - d) programme of works (including measures for traffic management)
 - e) provision of boundary hoarding behind any visibility zones
 - f) HGV deliveries and hours of operation
 - g) vehicle routing
 - h) measures to prevent the deposit of materials on the highway

- i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
- j) on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented during the construction of the development.

- 10) Prior to commencement of development, a Sensitive Lighting Management Plan (SLMP) approved by a suitably qualified ecologist and designed in accordance with the findings of the Ecological Impact Assessment (EAD Ecology, January 2023) and the updated bat surveys (required by Condition 2) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the SLMP shall be implemented in accordance with the approved details. The SLMP must be designed in line with Guidance Note 8 Bats and Artificial Lighting (GN08/23) and include, but not be limited to providing the following information:
- bat mitigation strategy
 - dark habitat corridors
 - demonstration of avoiding illuminance of key habitats
 - horizontal illuminance contour plan (lux) modelling and detail of luminaire specifications
- 11) Prior to the commencement of development, a Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP must be written by a suitably qualified ecologist and be in line with the Response to Surrey Wildlife Trust Ecology Planning Advice Service (EAD Ecology, May 2023) and Ecological Impact Assessment (EAD Ecology, January 2023). Thereafter the LEMP shall be implemented in accordance with the approved details. The LEMP should be based on the proposed impact avoidance, mitigation and enhancement measures specified in the above referenced report and should include, but not be limited to the following:
- a) description and evaluation of features to be managed.
 - b) ecological trends and constraints on site that might influence management.
 - c) aims and objectives of management.
 - d) appropriate management options for achieving aims and objectives.
 - e) prescriptions for management actions, together with a plan of management compartments
 - f) reparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period
 - g) details of the body or organisation responsible for implementation of the plan
 - h) ongoing monitoring and remedial measures
 - i) legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery.
 - j) monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

- k) final Biodiversity Gain Plan
- l) final Mitigation Strategy for Protected Species

- 12) Prior to the commencement of development, a Construction and Ecology Management Plan (CECoMP) shall be submitted to and approved in writing by the Local Planning Authority. The CECoMP must be written by a suitably qualified ecologist and be in line with the Response to Surrey Wildlife Trust Ecology Planning Advice Service (EAD Ecology, May 2023) and Ecological Impact Assessment (EAD Ecology, May 2023). Thereafter the CECoMP shall be implemented in accordance with the approved details.

The CECoMP should include, but not be limited to:

- a) map showing the location of all of the ecological features.
- b) risk assessment of the potentially damaging construction activities
- c) practical measures to avoid and reduce impacts during construction.
- d) location and timing of works to avoid harm to biodiversity features.
- e) responsible persons and lines of communication
- f) use of protected fences, exclusion barriers and warning signs.
- g) final Mitigation Strategy for Protected Species

Before above ground works

- 13) Before any above ground works take place, details to reduce the carbon emissions of the predicted energy use of the development hereby permitted by at least 10% against the Target Emission Rate for each dwelling, as determined by Part L of the Building Regulations 2022 shall be submitted and approved by the Local Planning Authority. All approved carbon reduction measures to serve a dwelling shall be implemented prior to the first occupation of that dwelling hereby permitted, and in accordance with the approved strategy.

Pre-occupation

- 14) Prior to the first occupation of any phase of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system for that phase has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

END OF SCHEDULE

Appendix JS4

Appeal Decision: Land to the West of Langton Road, Norton
(July 2016)

Appeal Decisions

Inquiry held on 7-10 June 2016

Site visit made on 8 June 2016

by P. W. Clark MA MRTPI MCMI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 22 July 2016

Appeal B Ref: APP/Y2736/W/15/3136237

(Site B) Land to the west of Langton Road, Norton

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Gladman Developments against the decision of Ryedale District Council.
 - The application Ref 15/00098/MOUT, dated 30 January 2015, was refused by notice dated 22 July 2015.
 - The development proposed is up to 85 residential dwellings including access.
-

Appeal A Ref: APP/Y2736/W/15/3136233

(Site A) Land to the west of Langton Road, Norton

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Gladman Developments against the decision of Ryedale District Council.
 - The application Ref 15/00099/MOUT, dated 30 January 2015, was refused by notice dated 22 July 2015.
 - The development proposed is up to 8 residential dwellings including access.
-

Decisions

1. Appeal B is allowed and planning permission is granted for up to 85 residential dwellings including access at (Site B) Land to the west of Langton Road, Norton in accordance with the terms of the application, Ref 15/00098/MOUT, dated 30 January 2015, subject to the sixteen conditions attached as Appendix B.
2. Appeal A is allowed and planning permission is granted for up to 8 residential dwellings including access at (Site A) Land to the west of Langton Road, Norton in accordance with the terms of the application, Ref 15/00099/MOUT, dated 30 January 2015, subject to the fifteen conditions attached as Appendix A.

Procedural matters

3. The Inquiry sat for four days but was held open until 17 June 2016 for closing submissions to be made in writing and for Unilateral Undertakings to be signed.
4. The address of the site is given as Norton. Norton and Malton are twin towns either side of the River Derwent in North Yorkshire. In many ways they function as a single entity and are treated as such in planning policy. Although they are variously termed Malton, Norton or Malton/Norton, these names all refer to the one conurbation or parts thereof.

5. Both applications are made in outline. In both cases, details of vehicular access to but not within the sites are submitted for approval now. Further details of pedestrian and cycle accesses to and all access within the sites and details of appearance, landscaping, layout and scale are reserved for later consideration in the event of either appeal being allowed.
6. The applications were made in the terms set out above. They are supported by a mass of documentation including a Development Framework Plan. In May 2015, during the Council's consideration of the applications, the originally submitted Framework Plan was substituted by a revised version showing reduced developable areas. A subsequent e-mail from the appellant asserts that the Development Framework Plan is intended to form part of the planning application. Nevertheless, the matters it depicts are clearly those which are shown on the application form to be reserved matters and the e-mail itself confirms (correctly) that the provisions of the Framework Plan would need to be secured by condition if thought necessary for the applications to be approved.
7. Notwithstanding the fact that the Council subsequently reconsulted on the application in terms which referenced numbers reduced from 8 to 6 for appeal A and from 85 to 79 for appeal B, there is no information to show that the terms of the application itself were so changed. In any event, as an outline proposal with matters of scale and layout reserved, any limitation of numbers, in the event of the developments being approved, would have to be imposed by condition. The screening opinions issued in March 2015 for the two sites were in terms of 10 dwellings for site A and 90 for site B.

Main Issues

8. There are four main issues common to both appeals. The first two and the last of these derive from reasons for refusal or from grounds of appeal common to both appeals. The third derives from a reason for refusal unique to appeal B but the issue equally applies to appeal A. They are the effects of the proposals on;
 - The significance of heritage assets, both designated and undesignated
 - The character and appearance of the neighbourhood, the setting of Norton and on protected trees
 - The need to travel and the use of sustainable modes of transport and
 - The supply of housing in general and affordable housing in particular.
9. Amongst other matters, third parties had concerns about flooding and about highway safety, particularly for horses.

Reasons

Heritage

10. Two heritage assets are in question. Both are outside but near the site. Confusingly, both have at one time or another been called Sutton Grange. I will refer to them as the barn and the house. The barn is a designated heritage asset, listed Grade II in 1986 as Sutton Farm Stone Barn. The house (currently called Sutton Grange) is neither listed nor included on any Local List

but both parties are agreed and I concur that it should be regarded as a non-designated heritage asset.

11. Both main parties are agreed and I concur that neither appeal proposal would have any direct effect on either asset. In both cases, the questions are whether there are any effects of the proposals on the assets' settings and, if so, whether any such effects affect their significance.
12. The way the barn is experienced today is largely from private property and at close range. It is approached from Langton Road by a private drive on appeal site A through protected woodland which hides it from view until, at the western end of the woodland (and of site A), the upper floor of its extensive north-eastern façade becomes visible over the roofs of garages (converted from sheds) which form a triangular courtyard to its east. The entry to the courtyard is at its north-western extremity at which point there is a full view of both the short north-western and long north-eastern elevations of the barn. It is from this point that some but not all of the significance of the building can be understood.
13. The drive continues past the north-western elevation, descending a bank and turning through approximately 180°. From this point the architecturally more interesting south-western elevation sited high on its terrace can be experienced, somewhat obscured by two new dwellings positioned in another courtyard at a lower level at which the drive ends but still dominating the scene. It is from this point that a more complete understanding of the significance of the building is obtained. It is, as the Council's Conservation Officer reports in her observations on the application, the large scale of the building and the status which its size and the elevated position of this frontage would have given to the purpose (which is unknown¹) for which it was built.
14. The impressive impact of this elevation can still be appreciated more fully from a point further to the south west where a track from Bazley's Lane crosses the line of the former driveway to the house and passes the former principal entrance to the grounds around the house. None of these ways of experiencing the setting of the barn and of understanding its significance would be affected by either of the appeal proposals.
15. From a public place, the upper parts of the barn can be seen over the rooftops and between the newly erected bungalows in Heron Close, to its north. This experience of its setting would not be affected by either of the appeal proposals.
16. The eastern corner of the barn can be glimpsed at a distance from breaks in the hedgerow along Langton Road, across both sites A and B but the views appear to be happenstance rather than designed and simply provide an awareness of a large building some way off. It is not possible, in these views, to derive much information about the nature of the building or its purpose, still less to divine whether it had any functional connection with the land across which it can be glimpsed. In truth, these views do not tell one much, if anything, about its significance. Their loss would cause little or no harm to the

¹ The listing description as a barn simply reflects the use to which it was put at the time of its listing. It is currently used as five residences. Evidence given at the Inquiry shows that fairly early in its life it was used, or partially used, as a gentleman's residence. My observations on site suggest that it may have been built as a stables and coach house with residential accommodation, an hypothesis accepted as plausible by both parties' experts. At the time it was built, Malton racecourse was flourishing. Even today, the breeding of racehorses is an important economic activity around Malton.

significance of the heritage asset and so I do not require their retention by condition. The dominance of the barn can be retained by a condition (14) limiting the height of buildings on site A.

17. The house, Sutton Grange, is also visible in these views and so they aid an understanding that the two buildings once had an association. The list entry for the barn specifically states that it does not form part of an Asset Grouping so I am not convinced that an appreciation of this relationship from this viewpoint (as opposed to the viewpoint south-west of the barn described earlier) is necessary to an understanding of either building's significance but I recognise that it is a concern of the Council. These views from Langton Road would be interrupted by development on either of the appeal sites but, in substitution, the development of appeal site A with an area of open space on the land formerly associated with the occupancy of the barn would allow public appreciation of both heritage assets from much closer viewpoints from which any significance deriving from the barn's proximity to the house in this view could be much better appreciated. The provision of this open space can be required by condition (13) attached to appeal A.
18. Both parties agree that the proposed developments would result in less than substantial harm to the listed building. I agree and conclude that any harm to the significance of the listed building by any effects on its setting by either appeal would be so minimal as to be effectively non-existent. Any such harmful effects as exist would be outweighed by the public benefits of enabling closer appreciation of the asset from within the site of appeal A, which could be secured by condition (13) on appeal A. It (appeal A) would therefore comply with that part of The Ryedale Plan Local Plan Strategy policy SP12 which provides that proposals which would result in less substantial² harm to a designated asset will only be agreed where the public benefit of the proposal is considered to outweigh the harm and extent of harm to the asset. I now turn to consider the house.
19. At some stage in its life the house has been reoriented so that its entrance is no longer on its north-western elevation but on its south-eastern side. The consequence is that, in contrast to the barn which is designed to be largely hidden by a wooded drive and to reveal its most spectacular impact when arriving at the house from its former (now abandoned) north-western driveway, the house is approached today by a straight drive running direct from Langton Road separated from open fields only by a post and rail fence. The approach today has no relationship with the barn.
20. Despite the low-lying position of the house, its ornate bargeboards, prominent gables and chimneys mean that it is now experienced as a "cottage ornée" forming a picturesque element in an open landscape backed by woodland seen in views from Langton Road. These views and the grand effect of its approach along a drive through open fields would largely be lost through the development of appeal site B and so would considerably reduce the contribution which the open setting of the house makes to its modern day significance as a prestigious country residence.
21. As an undesignated asset, its significance is less than statutory. Nevertheless, the appeal proposals would compromise the heritage elements of that part of The Ryedale Plan Local Plan Strategy policy SP12 which seek to ensure the

² The Strategy does not use the term "less than substantial" which is found in the NPPF

sensitive expansion, growth and land use change in and around the District's Market Towns and villages, safeguarding elements of the historic character and value within their built up areas, including Visually Important Undeveloped Areas (defined on the adopted Proposals Map) as well as surrounding historic landscape character and setting of individual settlements. This is both a heritage consideration and a landscape and townscape consideration to which I turn shortly.

22. The loss of longer distance views of the house would not in any way affect the appreciation of its heritage significance as a much-altered country house, which can only be understood by a forensic examination of its fabric at close quarters, principally from within the grounds of the house itself. Furthermore, as with the development of appeal A, the development of appeal B would allow longer distance public views to be replaced by a closer public appreciation of the heritage asset. The scale of any harm to this aspect of its significance is therefore minimal.
23. Both parties agree that the appeal proposals will result in less than substantial harm to the significance of the house. I agree, to the extent stated earlier. I conclude that although the proposal compromises that part of The Ryedale Plan – Local Plan Strategy policy SP12 which seeks to protect other features of local historic value and interest throughout Ryedale, having regard to the scale of any harm and the significance of the heritage asset, the matter would not be of great consequence.

Character and appearance

24. The appeal sites do not sit within any nationally or locally protected or designated landscape although the southern tip of site B abuts an Area of High Landscape Value. They do not lie within any Visually Important Undeveloped Area as defined on the Proposals Map, nor is there any published suggestion that they be designated as such within the emerging Local Plan Sites Document. Although all landscape is valued to a degree, there is no information to show that they are a particularly valued landscape within the compass of paragraph 109 of the National Planning Policy Framework (the NPPF). They are outside the defined settlement limits of Malton/Norton and so are formally regarded as countryside. It is a core planning principle of the NPPF that planning should recognise the intrinsic character and beauty of the countryside but these sites do not require any special consideration in terms of their landscape character or appearance.
25. Various analyses have been made of the character of the landscape in which they sit. They lie on the boundary between three of the one hundred and fifty-nine National Character Areas defined by Natural England. The appellant's expert³ places the sites within National Character Area 29 "Howardian Hills". The Council's expert⁴ places it within National Character Area 27 "Yorkshire Wolds". National Character Area 26 "Vale of Pickering" is close by. The boundaries of National Character Areas are broadly defined rather than following detailed local features and at their edges are likely to exhibit transitional characteristics.
26. Key characteristics of both the Howardian Hills NCA and the Yorkshire Wolds NCA include large estates and designed parklands with large country houses.

³ Paragraph 3.7 of Mr Holliday's evidence

⁴ Section 3.2.1 of AECOM's Landscape and Visual Appraisal June 2015

In response to a specific question, both parties' experts confirmed that the majority of these appeal sites did not represent designed parklands, the only element of which, in relation to the two heritage assets, was restricted to the wooded drive (protected by a Tree Preservation Order) leading to the listed barn and the garden areas immediately around the house and barn (including the western part of appeal site A). Both could be protected by conditions (13) and (15) of appeal A.

27. In other respects, although the sites exhibit features typical of the local National Character Areas, both parties agreed that their development would not lead to the loss of such features and would have a negligible effect on the character areas overall. I note that both the Yorkshire Wolds and Howardian Hills character areas feature sparse settlement but the existence of small market towns is recognised on the fringes of the Yorkshire Wolds and Malton is specifically mentioned in the description of the Howardian Hills and particular building materials are noted as characteristic of both areas, so built form as such is not inimical to their character. The more distant views of the site, illustrated in both parties' analyses, show that the built up area of Malton/Norton clearly figures in the landscape. The effect of developing the two sites would be to increase its extent by a marginal amount. The site itself hardly signifies in these more distant views so can barely be said to provide a setting for Norton.
28. At a regional level, the North Yorkshire County Council's North Yorkshire and York Landscape Characterisation Project identifies a Limestone Ridge character area encompassing the sites. This too notes several country houses with associated designed parkland settings as one of its key characteristics, along with others which would not be compromised by development of the sites. It too notes Malton as the only major settlement within the area. Consequently, the same inferences result from the regional characterisation as from the national one, which is that development of these sites would have a negligible impact.
29. At a district level, the Landscapes of Northern Ryedale, published on behalf of the District Council in 1999 identifies an area of Wooded Vale Farmland abutting the northern edge of the Yorkshire Wolds but notes that in common with the Open Vale Farmland found further east, it has few prominent landscape features. Again, this does not lead to a conclusion that there would be any great landscape significance resulting from the development of the appeal sites.
30. Both parties have conducted either a Landscape and Visual Appraisal or a Landscape and Visual Impact Appraisal for the site following the precepts of the Institute of Landscape Architects. For the most part they largely agree on their conclusions namely that both physical effects and visual effects are largely confined to the site itself, resulting from the transformational change from undeveloped land to developed land. As became apparent during cross-examination, the difference between them largely results from the value which the Council has placed on the site, high relative to that of other land within a Zone of Theoretical Visibility around the site in contrast to the appellant's more absolute, less relative concept of its lesser value in terms of landscape and visual impact.
31. The sites lie to the south-west of Langton Road. Site A is relatively level between the road to the east and the heritage assets to the west. Site B

slopes down from the road towards the Mill Beck stream. A substantial hedge largely hides the sites from public view although there are openings through which the Wolds can be seen across the site by looking south and a picturesque view of Sutton Grange nestling against a backdrop of trees can be obtained by looking north. The carriageway of Langton Road is elevated and so more continuous views across the site can be seen by passers-by on horseback or, more generally, when the hedgerow is trimmed.

32. There is no doubt that these are pleasant, even pretty, scenes. Their loss would be regretted. But the development of the sites would have no effect on the backdrop of trees which are off site. The retention of trees on site (along the driveway to the listed barn on site A or along the Mill Beck on site B) could be required by conditions (15) for appeal A and (16) for appeal B and, provided open space adjacent to the stream is retained (as it would be, by condition (15) of appeal B), development of site B would give public access to the same views at closer quarters, so I am not convinced that the transformational effects of developing the fields themselves in the way proposed would be harmful once development is completed.
33. Langton Road is a long straight approach to the heart of Norton. The protected trees on site A are presently at the southern extremity of continuous development along the western side of the road. But the alignment of the road is undeviating at that point so they are no more than an incident along its course. There are other trees along the road which have an equal effect. It is an exaggeration to say that they provide a visual stop because they are not paired by an equal clump on the opposite side of the road. Only when the road bends at the junction with The Ridings, further to the north, is there a visual stop with trees at both sides of the road.
34. Moreover, both sides of the road are experienced in common. On the east side, built development extends along Langton Road for about one quarter of the way opposite site B. There is a constructed gateway feature by the roadside at the point where a speed limit takes effect which provides a clearer indication to road users of Norton's extent.
35. As noted earlier, there is no clear view of Norton in which the sites present a foreground which provides a setting to the town. The straight alignment of Langton Road means that the sites are peripheral to the experience of arriving into Norton. The hedgerows which presently constrain peripheral views could be retained by condition. Consequently, the development of the sites would have little or no effect on the setting of the town. I am confirmed in this view by the advice of the Landscapes of Northern Ryedale, published on the Council's behalf in 1999; "From a landscape perspective, urban expansion would best be accommodated on the flat, low lying land to the south and east of the towns."
36. I conclude that the proposals would have no adverse effects on protected trees or the setting of Norton. There would be some very limited harm from appeal B to the character and appearance of this part of Langton Road resulting from the loss of some pleasant and attractive scenes and, as noted earlier, from the reduced contribution which the open setting of the house makes to its significance but elements of the historic character would remain and there would also be benefits resulting from the provision of public open space with its own pleasant views.

37. As noted earlier, appeal B would marginally compromise the heritage elements of that part of The Ryedale Plan Local Plan Strategy policy SP12 which seeks to ensure the sensitive expansion, growth and land use change in and around the District's Market Towns and villages, safeguarding elements of the historic character and value within their built up areas, including Visually Important Undeveloped Areas (defined on the adopted Proposals Map) as well as surrounding historic landscape character and setting of individual settlements. For that same reason and to that very limited degree also, the development of site B would compromise that part of policy SP13 which requires the quality, character and value of Ryedale's diverse landscapes to be protected and enhanced and which require new development proposals to contribute to the protection and enhancement of distinctive elements of landscape character. For that same reason and to that same very limited degree, appeal B would also compromise those parts of policy SP20 which deal with Character, requiring new development to respect the character and context of the immediate locality and the wider landscape and townscape character.

The need to travel

38. In terms of daily life, Malton/Norton is recognised by The Ryedale Plan – Local Plan Strategy as Ryedale's Principal Town offering the greatest concentration of employment so it should at least be possible in theory for residents to find work locally. My visit to the site made me aware that there are local employment opportunities in horse breeding and training establishments and in Norton College near to the site but there is no suggestion other than that the majority of employment opportunities in Malton/Norton would be in the centre of town or on industrial estates on the outskirts which are described in the Special Qualities Study of Ryedale's Market Towns included within the appellant's Core Documents. The centre of the twin towns is between 1.5 and 2km from the sites. Industrial estates on the outskirts would be further afield. It is unlikely that these distances would be favoured for walking and so there would be a degree of need to travel for work from the proposed developments.
39. Commuting to York or elsewhere may be preferred as a matter of choice but the bus stop from which a service to York is provided is agreed to be 1.3km from the access to site A and 1.4 km from the access to site B. The railway station offers potential for commuting further afield but is 1.8km from site B. These are all greater distances than those preferred for walking and so their use would, in themselves, generate a need for transport.
40. Likewise, although Malton/Norton offers the greatest concentration of retail and leisure facilities in the District, the nearest local shopping facilities listed in the Statement of Common Ground are stated to be more than 1km from the site entrance to appeal B. This is greater than the preferred walking distances set out in Manual for Streets or the recommendations of the Institute of Highways and Transportation, so it is likely that these daily requirements would give rise to a need to travel.
41. Norton College is close at hand but a Primary School is more than a kilometre distant. There is a proposal to provide a much closer outpost of this school for years 5 and 6 but even if this proposal reaches fruition, it is clear that for many primary schoolchildren there would be a need to travel.

42. Less than daily needs, such as a GP surgery and a Library are provided for in Malton/Norton but are about 1.4 and 1.8km distant so would generally give rise to a need to travel.
43. Norton is noted in the evidence to be less well provided with green infrastructure than Malton but the proposals would be provided with open space on site together with an equipped play area. Not only would this reduce the need to travel for leisure facilities from the development but it would also contribute to the wider needs of Norton and so must be counted as a benefit of the development.
44. It is apparent therefore that for all other than secondary education and recreation facilities on local open space, development of the appeal sites would not comply with the second of the six bullet points providing site selection criteria in The Ryedale Plan - Local Plan Strategy policy SP1. This looks for a site's ability to support access on foot to centrally located shops, services and facilities.
45. The NPPF in paragraph 34 and in the eleventh of the twelve Core Principles set out in paragraph 17 is less prescriptive. Where the need to travel will be minimised is part of its advice on the location of developments which generate significant movement but where the use of sustainable transport modes can be maximised is also a factor in its advice on where such development should be located. These are defined as including walking, cycling, low and ultra low emission vehicles, car sharing and public transport.
46. Although the distances to the facilities considered above would discourage walking, they are not so great as to deter cyclists. Moreover, at least as far as central Norton, the route is relatively flat and not so heavily trafficked as to be a deterrent to cycle use. Beyond Norton, into Malton would require the shared use of more heavily trafficked roads without specific cycle facilities, a stiff hill and passage through an Air Quality Management Area (AQMA), so is less conducive to cycling but I am satisfied that most daily needs could be met without travelling so far.
47. Despite the AQMA there is no information to show that Malton/Norton, or the development proposal, offers any particular facilities for low or ultra-low emission vehicles but suggested conditions (11) in both appeals would require the provision of electric vehicle charging points. It is suggested that a travel plan be required by condition (13) of appeal B and there is funding provision for its implementation within the s106 obligation. Through that, car sharing could be promoted to maximise the use of that sustainable transport mode.
48. A regular hourly bus service is provided on Langton Road past the sites, nine times a day, Mondays to Saturdays but it does not run after late afternoon so normal hours of commuting to more distant employment are not feasible by public transport. It is not well publicised; it is a hail and ride service so no bus stops indicate its existence or provide information about timetables. No information is provided about the route followed but timing points include Field View on Langton Road opposite the sites and various points in Malton/Norton town centres.

49. In the material supporting the outline applications, repeated assertions are made⁵ to the effect that the development would make improvements to the bus services along Langton Road. In the event, the Unilateral Undertakings only provide £5,000 as a contribution towards the provision of and/or improvements to two bus stops in Norton. This does little to reduce the need to travel from the development or to maximise the use of sustainable transport modes by residents of the site, so I take no account of it. Nevertheless, bearing in mind the NPPF's exhortations to take account of the nature and location of the site and of policies to support a prosperous economy in rural areas, it has to be recognised that, even without improvement, the bus service is reasonably good for a rural market town and offers the sites a further sustainable mode of transport.
50. I conclude that the developments would generate a need to travel which could be met only in small part by walking. In consequence, the proposals would conflict with one of the provisions of The Ryedale Plan - Local Plan Strategy policy SP1 but, with the conditions suggested, it would be possible to maximise the use of other sustainable transport modes in the way the NPPF recommends.

Housing

51. Policy SP1 of The Ryedale Plan – Local Plan Strategy provides that Ryedale's future development requirements will be distributed and accommodated in line with the Spatial Strategy Summary and on the basis of a hierarchy of settlements in which Malton and Norton is defined as the primary focus of growth. The Spatial Strategy Summary defines the role of Malton and Norton as the focus for the majority of new development and growth including new housing (amongst other matters). The implementation of policy SP1 is to be through the Local Plan Sites Document and Neighbourhood Development Plans for the location of development and for the planned supply of new development sites and through the Development Management Process for development proposals (i.e the consideration of planning applications or, in these cases, planning appeals).
52. Policy SP2 provides that the sources of new housing that will contribute to the supply of new homes across the District includes Housing Land Allocations in and adjacent to the built up area of Malton and Norton. It stipulates that 50% of the District's level of provision should be located at Malton and Norton. Its implementation section records the actions or mechanisms to implement different parts of the policy. For the allocation and release of sites two mechanisms are listed; one is the Local Plan Sites Document, the other is the Development Management Process (i.e the consideration of these appeals). In advance of the Local Plan Sites Document the release of sites will be influenced by the five-year deliverable supply position.
53. The Local Plan Sites Document has yet to be produced and is at an early stage of preparation. The development plan is not completely silent on the matter of locations for housing, indicating in general terms the acceptability of locations in and adjacent to the built up area of Malton and Norton and setting a target of 100 dwellings per annum for that general location. But, other than the

⁵ Transport Assessment paragraphs 3.1.5 and 4.8.3, Planning Statement paragraphs 2.2.3, 4.4.24, 5.2.11, 8.4.3 and Appendix 2 and Diana Richardson's evidence paragraph 9.3.25

- advice to be influenced by the five-year deliverable supply position it is silent on the precise allocation of sites.
54. The final bullet point of NPPF paragraph 14 advises that where the development plan is silent, the presumption in favour of sustainable development means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework taken as a whole or, if specific policies in the Framework indicate development should be restricted. It follows that, whether the decision on these appeals is taken in accordance with the development plan or whether it is taken in accordance with the other material considerations of the NPPF, a balancing exercise is necessary in which one factor is consideration of the Council's five-year deliverable housing supply.
 55. The Council's housing requirement is set in The Ryedale Plan – Local Plan Strategy as at least 3,000 (net) new homes over the period 2012-2027 of which 50% should be in or adjacent to Malton/Norton. This plan is recent (5 September 2013) and was found sound in the light of the NPPF (March 2012). The Inspector's report (paragraphs 37 - 49) make it clear that reliance was not placed solely on evidence prepared for the now cancelled Yorkshire and Humberside Regional Spatial Strategy but that an objective assessment of housing need was carried out in late 2011 – early 2012, using 2004, 2008 and 2010 – based population and housing projections along with an employment-led growth scenario and an analysis of affordable housing need. None of this is inconsistent with the outcomes of the "Hunston", "Solihull", "Satnam" and "Kings Lynn" cases to which I was referred. The plan has not been successfully challenged.
 56. The final requirement figure is mid-way between those required using the 2008 and 2010 – based population and household projections and would also more than meet the (then) most recent 2011-based interim household projections. The Inspector who examined the Plan observed that it would be unwise to base the plan on a single set of household projections. He concluded by saying that a total level of 3,000 dwellings or 200 dwellings per year represents a realistic, balanced, deliverable, justified and soundly based figure which would meet the objectively assessed housing needs of the district over the plan period.
 57. Paragraph 4.32 of the reasoned justification to the plan recognises that housing needs and requirements can change over time and so commits to reviewing housing needs in five years. The Council has commenced this review by publishing a Strategic Housing Market Assessment (SHMA) in April 2016 using 2012-based household projections. This concludes (paragraph 9.35) that an appropriate Objectively Assessed Need (OAN) figure for Ryedale excluding the North York Moors National Park would be 204 dwellings per annum. This does not suggest that the requirement set in the plan is out of date.
 58. The appellant contests the findings of this SHMA based on three components of the SHMA; economic-led needs, market signals and affordable housing needs. The criticisms of the economic forecasts used as an input to the SHMA are three fold; (i) the economic forecasts may be conservative (ii) Planning Practice Guidance (PPG) advises that likely changes in job numbers should be based on past trends and/or economic forecasts as appropriate, whereas the SHMA uses economic forecasts only and (iii) the economic forecasts use their own estimates of local economic activity rates rather than national ones which may be lower.

59. It is not for me in this s78 appeal to do a forensic examination of economic forecasts which are but one strand of a SHMA which is but one input to the adoption of a housing requirement but I observe that of these three criticisms, (i) is purely speculative, (ii) is criticism of a choice of one method which the PPG endorses as an alternative and (iii) prays in aid an appeal decision at Redcar which drew on extensive evidence specific to the applicability of that issue to that location. I note that the appellant's expert witness concludes that "on its own merits, the above [comments] on economic-led needs would not lead me to conclude that OAN must be greater than that concluded within emerging SHMA". I have no reason to disagree.
60. The appellant's criticisms of the SHMA's response to market signals is largely concerned with its adequacy for dealing with affordability, which overlaps with the third concern. The suggestion of a 20% uplift rather than the 10% uplift used in the SHMA is based on the recommendations of the Local Plans Expert Group which has yet to be endorsed by government and, as the appellant's expert himself says, can be given little weight.
61. The appellant's third concern turns around the advice in the NPPF, amplified in the PPG, for meeting the full objectively assessed needs for affordable housing. There are two components to the criticism. One concerns a disagreement over data sources for relets of affordable rented housing, both parties using different but equally reliable sources which give different results, though these are relatively marginal. The other, more major component is the SHMA's redefinition of what constitutes affordability from a threshold of 25% of household income to a threshold of 30%.
62. Whilst sharing the appellant's distaste, expressed so eloquently by the quotation from my colleague Mr Thickett in his April 2014 report on the examination into the East Hampshire Plan, for redefining the threshold of affordability in such a way that plays down identified demand, adjusting for this factor merely takes us back towards the situation examined by the Local Plan Inspector in 2013. Then, as paragraph 55 of his report points out, the SHMAs estimated a 5-year net shortfall of affordable housing of between 250-270 affordable units per year. His paragraph 43 pointed out that the estimated annual need for affordable housing exceeded the proposed annual level of housing provision and would be even higher if it were to rely solely on delivering such housing as a proportion of market housing. He reported (in paragraphs 44 and 57) that to meet the full need for affordable housing through the provision of market housing would mean setting unrealistic and undeliverable overall targets of more than 550 dwellings per year.
63. He commented, in a passage which refutes the implications for the plan of the appellant's contention that the SHMA does not set out an estimation of deliverability, that the plan, as submitted and amended, aims to deliver as much affordable housing as it can, with no maximum provision, and there may be other ways to provide such housing. He concluded in paragraphs 44 and 62 that the NPPF does not expect plans to meet the highest level of evidenced need but requires a more balanced objective assessment and that policy SP3 will help to positively address the high levels of need for affordable housing and would provide an effective, justified and soundly based framework for delivering affordable housing over the period of the plan, consistent with national policy.

64. In other words, the appellant's observations on the need to increase housing requirements in order to increase the supply of affordable housing do not raise new issues not taken into account in the adopted plan. However much moral high ground is taken concerning the redefinition of the threshold of affordability, no current guidance contradicts the approach taken by the SHMA 2016. The appellant's arguments do not therefore invalidate the conclusions of the SHMA 2016, nor do they undermine the continued validity of the housing requirement as set out in the adopted Ryedale Plan – Local Plan Strategy.
65. From this it follows that, as agreed in the Statement of Common Ground, Ryedale can demonstrate a five-year deliverable supply of housing land. There is no information to show that the position in relation to the subsidiary requirement for Malton and Norton (50% of the total) is any different. Reverting back to the point of the argument considered earlier, it follows that, in accordance with policy SP2, this is a factor which should influence consideration of release of sites in advance of the Local Plan Sites Document.
66. In relation to affordable housing, the position is agreed. Annual affordable housing requirements have not been delivered in full in Ryedale in each year of the plan period to date. The 2016 SHMA's redefinition of the threshold for affordable housing does not and cannot rewrite the repeated complaints in the Local Plan Strategy to the effect that the lack of affordable housing is the main imbalance in Ryedale's housing market, that Ryedale has an acute need for affordable housing and that increasing the supply of new affordable homes is a priority.
67. Policy SP3 seeks the provision of 35% of new dwellings as affordable housing on site for developments of more than 5 dwellings or on sites of 0.2ha or more. The appellant's uncontroverted evidence shows that over a ten-year period, Ryedale achieved 25%, increasing to 31% in a more recent five-year period but in the three years of the Local Plan Strategy's existence has delivered 60, 47 and 67 affordable dwellings against a target of 79 each year. It follows that the offer of 35% in the submitted Unilateral Undertakings, although no more than complying with policy, should be regarded as a considerable benefit.
68. The separation of the proposals into two separate planning applications with two separate Unilateral Undertakings would bring site A (if limited to ten dwellings or less) within the scope of government policy, set out in the Written Ministerial Statement of 28 November 2014 and elaborated in Guidance, that affordable housing contributions should not be sought on sites of ten units or less. The reason for this policy is to avoid a disproportionate burden on small-scale developers.
69. But the present appellant is not a small-scale developer. Whatever the reason for making two separate applications (understood to be related to the slightly different ownership arrangements of the two sites), or the future intentions of the appellant to subdivide the sites into smaller parcels for sale to other builders, there is more that unites these two appeals than separates them. The applications were made on the same day and determined on the same day. Four of the five reasons for refusal are common to both sites and even the appellant expressed surprise that the fifth was not equally applied. Twenty of their supporting documents and the supporting Framework Plan are common to both applications.

70. Only the Heritage Statements and the Socio-Economic Sustainability Statements are unique to each application. The two appeals have been conjoined in this Inquiry and the expert witness evidence is common to both applications. Indeed, when specifically asked, why two applications were made, the appellant's planning witness commented that she could not explain it and would not have recommended it (the explanation noted above was given by the appellant's advocate). For all these reasons, I do not disapply policy SP3 from site A and I do take account of the affordable housing provisions of the Unilateral Undertaking for site A as a benefit of the scheme.
71. In relation to the effect of the proposals on housing in general and affordable housing in particular, I conclude that the proposals would deliver the equivalent of about one year's housing supply for Malton and Norton (50% of that for Ryedale) but that the Council can demonstrate a deliverable five-year housing supply without these sites. So, the benefits of the proposals to housing supply in general are limited to boosting the supply to a level which is more than required.
72. On the other hand, in the light of the Council's track record, the proposals' full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit.
73. Although the sites lie outside the development limits for Malton and Norton defined on the Proposals Map, policy SP2 allows for housing land allocations in and adjacent to the built up area to be released through the Development Management Process in advance of the Local Plan Sites Document, so the release of these sites through these appeals would not be inconsistent with the policy. As already noted, the proposals would comply with policy SP3 for the supply of affordable housing.

Other matters

74. There is evidence that the sites have a high water table and experience standing water at certain times. However, there is technical evidence, not controverted, to the effect that this can be dealt with by means of a retention pond to hold surface water run-off on the lowest part of the land sealed against the effects of rising ground water.
75. Local horse breeders and trainers have concerns, supported with evidence, of the dangers which modern traffic poses to their livelihoods and to the safety of their horses. But, it is clear that the developments proposed would generate effects on the local highway network variously described as minimal, minor or marginal. Even if the developments were not allowed to proceed, background growth in traffic in the local area would result in the same effects within a few years, so the solution to the horse trainers' problems would not be found by denying permission for these appeal proposals.
76. The two sites are presently agricultural land, some of which is grade 3A (Best and Most Versatile). Although not a reason for refusal, NPPF paragraph 112 advises that the economic and other benefits of the best and most versatile agricultural land should be taken into account. Policy SP17 of the Local Plan

Strategy includes protection of the best and most versatile agricultural land from irreversible loss, which will be resisted unless the proposed use cannot be located elsewhere and that the need for the development outweighs the loss of the resource. However, there is little evidence of any great economic benefit arising from the land. Its other benefits have been considered earlier. This is therefore not a conclusive point but one which needs to be weighed in the overall balance.

77. As agricultural land, the site is greenfield. Its development would not therefore accord with the eighth of the government's core planning principles set out in NPPF paragraph 17 and repeated in NPPF paragraph 11 that planning decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land). However, national policy does not preclude the development of greenfield land, it simply prioritises other land. But, it is clear from the Local Plan Strategy, that to meet housing needs, greenfield land will need to be released so, once again, this is not a compelling argument against the developments, simply a matter to be weighed in the balance.

Conclusions

78. Planning applications and appeals should be determined in accordance with the development plan unless there are material considerations which indicate otherwise. In this case, the Local Plan Strategy is recently adopted and up to date. Whilst it is silent on the precise allocation of sites for housing development, it provides a mechanism for their allocation through the operation of the Development Management System in the absence of the Local Plan Sites Document.
79. Applying the provisions of the development plan to these proposals, I have found harm to the significance of the nearby listed building to be effectively non-existent and so Appeal A complies with policy SP12. Appeal B would considerably reduce the contribution which the open setting of the house makes to its modern significance as a prestigious country residence.
80. As an undesignated asset, its significance is less than statutory. Nevertheless, the appeal B proposals would marginally compromise the heritage elements of that part of The Ryedale Plan Local Plan Strategy policy SP12 which seek to ensure the sensitive expansion, growth and land use change in and around the District's Market Towns and villages, safeguarding elements of the historic character and value within their built up areas, including Visually Important Undeveloped Areas (defined on the adopted Proposals Map) as well as surrounding historic landscape character and setting of individual settlements. It would also compromise that part of The Ryedale Plan – Local Plan Strategy policy SP12 which seeks to protect other features of local historic value and interest throughout Ryedale but, having regard to the scale of any harm and the significance of the heritage asset, the matter would not be of great consequence.
81. For the same reason and to the same degree, the development of site B would compromise that part of policy SP13 which requires the quality, character and value of Ryedales's diverse landscapes to be protected and enhanced and which requires new development proposals to contribute to the protection and enhancement of distinctive elements of landscape character. It would also compromise those parts of policy SP20 which deal with Character, requiring

- new development to respect the character and context of the immediate locality and the wider landscape and townscape character.
82. In terms of the need to travel, both appeal proposals would conflict with one of the provisions of The Ryedale Plan - Local Plan Strategy policy SP1 but, with the conditions suggested, it would be possible to maximise the use of other sustainable transport modes in the way the NPPF recommends. Both appeals would conflict to a degree with Local Plan Strategy policy SP17 but the Council agrees that this is not a reason for dismissing the appeals.
83. As noted earlier, the proposals would comply with the general locational requirements of policy SP2, which provides for the allocation of sites through the development management process influenced by the five-year deliverable supply position. That does not indicate any overriding need for an allocation to be made. On the other hand, the proposals would also comply with policy SP3, which would be of considerable benefit, given the Council's record of delivery of affordable housing.
84. The application of the substantive development plan proposals does not lead to a definitive result because the conflicts with policies SP12, 13, 17 and 20 are fairly inconsequential but a contribution to affordable housing in accordance with policy SP3 would be significant. Four policies are conflicted but the Council agrees that conflict with one of these is of no concern at all and the conflict with the other three amounts to triple-counting of the same effect; namely the loss of some attractive perspectives of an undesignated heritage asset of limited significance.
85. The decisive consideration is policy SP19, the Council's presumption in favour of sustainable development. This aims to secure development that improves the economic, social and environmental conditions in the area. Consistent with that in the NPPF, this policy has three strands.
86. Although the parties' Statement of Common Ground asserts that they disagree over the weight to be attached to the harms and benefits of the proposals, there was in fact little disagreement other than those already analysed in this decision. In summary, I have found that, as greenfield sites, the land is not of the government's preferred type and, as the Council has a five-year housing land supply, it is not necessarily needed at this particular time but it is available in the right place to contribute to building a strong, responsive and competitive economy. The appellant's lists of specific economic benefits were not challenged and its Unilateral Undertakings will coordinate development requirements with the provision of infrastructure.
87. The proposals will support strong, vibrant and healthy communities by providing affordable housing required to meet the needs of present and future generations. As outline proposals, there is no reason to believe that detailed proposals will not create a high quality built environment. There are accessible local services which will reflect the community's needs and support its health, social and cultural well-being.
88. As greenfield sites, development inherently fails to protect the natural environment but the appeals will largely protect the historic environment and, through the use of conditions both now ((8) and (15) for appeal A, (7) and (16) for appeal B and (11) for both) and at reserved matters stage will help to

improve biodiversity, use natural resources prudently, minimise waste and pollution and mitigate and adapt to climate change.

89. On balance these would be sustainable developments and can therefore be said to comply with the development plan when read as a whole. So, subject to conditions, the appeals should be allowed and permission should be granted.

Conditions and obligations

90. Both appeals are supported with Unilateral Undertakings. Both provide for affordable housing which, as noted above is necessary to comply with policy SP3 and which I count as a considerable benefit of the scheme. Both provide a financial contribution towards air quality mitigation measures. Correspondence between the parties suggests that this will be used to exclude high polluting Heavy Goods Vehicles from the Air Quality Management Area and so compensate for the additional air pollution caused by traffic from the developments. It is therefore necessary for the acceptability of the developments.
91. Site B would provide £5,000 towards the provision of and/or improvements to two bus stops in Norton. Correspondence between the parties suggests that this would relate to two bus stops in the centre of Norton. As noted above, these are too far from the site to encourage the use of sustainable modes of transport by residents of the development and so I consider that this provision is not necessitated by or related to the development of site B and so I take no account of it in my decision.
92. Site B would also provide for a footpath link to Bazleys Lane and so to the Wolds Area of High Landscape Value. This is part of the open space proposals, for which both Undertakings make provision including a play area on site B and which, as noted earlier, are necessary to remedy open space and green infrastructure shortfalls in the area. Site B would also provide a sum of money to provide improved road signage advising motorists of horse riders in the area. Although not solely necessitated by the development, this would be a proportionate contribution and so I take it into account as a mitigating measure. Site B would also provide funding for a travel plan, the necessity for which was noted earlier.
93. The parties jointly suggested 29 conditions for site A and 28 for site B. I have considered these in the light of Guidance and the model conditions appended to the otherwise superseded Circular 11/95, the Use of Conditions in Planning Permissions, preferring the wording of the latter where appropriate.
94. Many of the suggested conditions either duplicated the standard requirement to submit details of reserved matters, or were in effect informatives about the desired content of reserved matters applications or required the implementation or retention of matters which are not before me but which would be the subject of reserved matters or details to be submitted for approval later and so would be more appropriate for imposition when such details are considered.
95. I have not imposed the suggested conditions limiting the numbers of dwellings because "dwelling" is not a precise unit but ranges from a studio flat to a multi-room mansion. Rather, I have imposed conditions limiting the extent of development and height of buildings and specifying the location of open space to be provided in accordance with the recommendations of the appellant's

consultants. In addition to conditions already discussed in this decision, I have imposed conditions requested by the Council's advisers or consultees or suggested by the appellant's consultants for the reasons given in their respective representations.

P. W. Clark

Inspector

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

David Manley QC	Instructed by Anthony Winship, Solicitor to Ryedale District Council
He called	
Nigel Weir BA(Hons) MA CMLI	Associate Landscape Architect, AECOM
Jennifer Deadman BA(Hons)	Historic Building Consultant
Emma Woodland BA(Hons) MA AffIHBC	Building Conservation Officer, Ryedale District Council
Nick Ireland BA(Hons) MTPI MRTPI	Planning Director, G L Hearn
Matthew Gilbert BSc(Hons) MRTPI	Director, The Planning Consultancy

FOR THE APPELLANT:

Martin Carter, of Counsel	Instructed by Diana Richardson, Planning Manager, Gladman Developments Limited
He called	
Gary Holliday BA(Hons) MPhil CMLI	Director, FPCR Environment and Design Limited
Jason Clemons BA(Hons) DipUD MA MSc MRTPI IHBC	Director and Head of Historic Buildings, RPS CgMS
Martin David Taylor BSc MSc MRTPI MIED	Associate Director, Nathaniel Lichfield and Partners
Diana Richardson MA BA(Hons) MRTPI	Planning Manager, Gladman Developments Limited

INTERESTED PERSONS:

Harry Cawte	Local Resident
Cllr Lindsay Burr	Local Resident and local Councillor
Fiona Campion	Local Resident
Mark Campion	Local Resident
Patrick Gray DipTP MRTPI	Partner, Hickling Gray Associates, on behalf of Local Residents

ADDITIONAL DOCUMENTS submitted at Inquiry

- 1 Notification of Appeal B 10 November 2015
- 2 Notification of Appeal A 10 November 2015
- 3 Notification of Date, Time and Place, appeal B 9 May 2016
- 4 Notification of Date, Time and Place, appeal A 9 May 2016
- 5 Statement of Common Ground signed 7 June 2016
- 6 Sales Particulars, Sutton Farm Norton
- 7 Two bundles of letters of objection and photographs
- 8 E-mail from Fiona Campion 22 April 2016 with photographs

- 9 E-mail from Peter Callaghan 8 June 2016 granting access to Sutton Farm for site visit
- 10 Further Comments from Highways 27 May 2016
- 11 Nick Ireland's Note on Affordable Housing
- 12 Extracts from Planning Practice Guidance; Housing and economic development needs assessments
- 13 Copy of engraving c1790; "Sutton near Malton" The Manor House
- 14 Bundle of photographs from Mark Campion
- 15 Draft Unilateral Undertaking site A
- 16 Draft Unilateral Undertaking site B
- 17 Note from Jason Clemons; Why is the barn such a dominant building?
- 18 Ryedale District Council Housing Strategy Action Plan Draft August 2015
- 19 York, North Yorkshire and East Riding Housing Strategy 2015-21, May 2015
- 20 Diana Richardson's Table 1 revised following evidence of Mr Gilbert
- 21 Written submission by Jennifer Hubbard BA
- 22 Hydrock note on traffic at site access/Langton Road junction
- 23 Suggested conditions site A
- 24 Suggested conditions site B

ADDITIONAL DOCUMENTS submitted after Inquiry

- 1 Unilateral Undertaking Appeal A dated 14 June 2016
- 2 Unilateral Undertaking Appeal B dated 14 June 2016

Appendix A; Conditions for Site A (appeal ref APP/Y2736/W/15/3136233)

- 1) Details of appearance, landscaping, layout, and scale, and further details of the access (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than three years from the date of this permission.
- 3) The development hereby permitted shall begin not later than two years from the date of approval of the last of the reserved matters to be approved.
- 4) The access to the development hereby permitted shall be carried out in accordance with the following approved plan: 14531-002 revision P1.
- 5) Construction of the access to the development shall not commence until the two traffic calming "speed cushions" in Langton Road in the vicinity of the proposed access have been removed and replaced in positions to be agreed in writing with the local planning authority and the carriageway reinstated.
- 6) The access shall not be used by vehicles until pedestrian visibility splays providing clear visibility of 2m x 2m measured down each side of the access and the back edge of the footway of Langton Road have been provided. Once provided, the visibility splays shall be kept clear of any obstruction to visibility below 1.5m above carriageway height
- 7) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
 - i) the parking of vehicles of site operatives and visitors
 - ii) loading and unloading of plant and materials
 - iii) storage of plant and materials used in constructing the development
 - iv) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
 - v) wheel washing facilities
 - vi) measures to control the emission of dust and dirt during construction
 - vii) a scheme for recycling/disposing of waste resulting from demolition and construction works
 - viii) Hours of work
- 8) No development shall take place until a scheme of public lighting has been submitted to and approved in writing by the local planning authority.
- 9) No development, including demolition, shall take place until a site investigation of the nature and extent of contamination has been carried out in accordance with a methodology which has previously been submitted to and approved in writing by the local planning authority. The results of the site investigation shall be made available to the local planning authority before any new construction begins. If any contamination is found during the site investigation, a report specifying the measures to be taken to remediate

the site to render it suitable for the development hereby permitted shall be submitted to and approved in writing by the local planning authority. The site shall be remediated in accordance with the approved measures before new construction begins. If, during the course of development, any contamination is found which has not been identified in the site investigation, additional measures for the remediation of this source of contamination shall be submitted to and approved in writing by the local planning authority. The remediation of the site shall incorporate the approved additional measures.

- 10) No development shall take place until details of the proposed means of disposal of foul and surface water drainage have been submitted to and approved in writing by the local planning authority.
- 11) No development shall take place until details of the provision of one electric charging point for each dwelling and one public charging point per ten dwellings (or lesser number of dwellings) have been submitted to and approved by the local planning authority.
- 12) The development shall be carried out in accordance with the approved details submitted as required by conditions 1, 7, 8, 10 and 11 and shall thereafter be retained as approved.
- 13) No dwelling shall be constructed nor residential curtilage laid out west of the remnant hedgerow identified as TG6 on drawing number 6283-A-02 included within the Arboricultural Assessment dated February 2015. The land west of the remnant hedgerow shall be laid out as open space in accordance with details to be submitted in compliance with condition 1.
- 14) No dwelling shall exceed a single storey of accommodation with an additional storey of accommodation contained within the roofspace.
- 15) In this condition "retained tree" means an existing tree or hedgerow which is to be retained in accordance with the Tree Retention Plan drawing 6283-A-03 revision C contained within the submitted Arboricultural Assessment dated February 2015; and paragraphs (i) and (ii) below shall have effect until the expiration of 1 year from the date of the first occupation of the final dwelling to be completed.
 - (i) No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved Tree Retention Plan, without the written approval of the local planning authority. Any topping or lopping approved shall be carried out in accordance with British Standard 3998 (Tree Work).
 - (ii) If any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the local planning authority.
 - (iii) The erection of fencing for the protection of any retained tree shall be undertaken in accordance with section 5 of the submitted Arboricultural Assessment dated February 2015 before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any

excavation be made, without the written approval of the local planning authority.

Appendix B; Conditions for Site B (appeal ref APP/Y2736/W/15/3136237)

- 1) Details of appearance, landscaping, layout, and scale, and further details of the access (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than three years from the date of this permission.
- 3) The development hereby permitted shall begin not later than two years from the date of approval of the last of the reserved matters to be approved.
- 4) The access to the development hereby permitted shall be carried out in accordance with the following approved plan: 14531-004 revision P1.
- 5) The access shall not be used by vehicles until pedestrian visibility splays providing clear visibility of 2m x 2m measured down each side of the access and the back edge of the footway of Langton Road have been provided. Once provided, the visibility splays shall be kept clear of any obstruction to visibility below 1.5m above carriageway height
- 6) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
 - ix) the parking of vehicles of site operatives and visitors
 - x) loading and unloading of plant and materials
 - xi) storage of plant and materials used in constructing the development
 - xii) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
 - xiii) wheel washing facilities
 - xiv) measures to control the emission of dust and dirt during construction
 - xv) a scheme for recycling/disposing of waste resulting from demolition and construction works
 - xvi) Hours of work
- 7) No development shall take place until a scheme of public lighting has been submitted to and approved in writing by the local planning authority.
- 8) No development, including demolition, shall take place until a site investigation of the nature and extent of contamination has been carried out in accordance with a methodology which has previously been submitted to and approved in writing by the local planning authority. The results of the site investigation shall be made available to the local planning authority before any new construction begins. If any contamination is found during the site investigation, a report specifying the measures to be taken to remediate the site to render it suitable for the development hereby permitted shall be submitted to and approved in writing by the local planning authority. The site shall be remediated in accordance with the approved measures before new construction begins. If, during the course of development, any contamination

is found which has not been identified in the site investigation, additional measures for the remediation of this source of contamination shall be submitted to and approved in writing by the local planning authority. The remediation of the site shall incorporate the approved additional measures.

- 9) No development shall take place until details of the proposed means of disposal of foul and surface water drainage have been submitted to and approved in writing by the local planning authority.
- 10) No building or other obstruction shall be located over or within 3m either side of the centre line of the sewer which crosses the site and no building within 15m of the sewage pumping station located at the southern end of the Langton Road boundary of the site.
- 11) No development shall take place until details of the provision of one electric charging point for each dwelling and one public charging point per ten dwellings (or lesser number of dwellings) have been submitted to and approved by the local planning authority.
- 12) No development shall take place until a programme of archaeological work has been implemented in accordance with a written scheme of investigation which has been submitted to and approved in writing by the local planning authority.
- 13) No dwelling shall be occupied until a Travel Plan for the site has been submitted to and approved in writing by the local planning authority.
- 14) The development shall be carried out in accordance with the approved details submitted as required by conditions 1, 6, 7, 9, 11, 12 and 13 and shall thereafter be retained as approved.
- 15) No dwelling shall be constructed nor residential curtilage laid out on land indicated as "Green Infrastructure (including POS)" on the submitted Development Framework Plan drawing number 6283-L-03b revision K dated May 2015. The land indicated as "Green Infrastructure (including POS)" shall be laid out as open space including a Local Equipped Area of Play in accordance with details to be submitted in compliance with condition 1.
- 16) In this condition "retained tree" means an existing tree or hedgerow which is to be retained in accordance with the Tree Retention Plan drawing 6283-A-03 revision C contained within the submitted Arboricultural Assessment dated February 2015; and paragraphs (i) and (ii) below shall have effect until the expiration of 1 year from the date of the first occupation of the final dwelling to be completed.
 - (i) No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved Tree Retention Plan, without the written approval of the local planning authority. Any topping or lopping approved shall be carried out in accordance with British Standard 3998 (Tree Work).
 - (ii) If any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the local planning authority.
 - (iii) The erection of fencing for the protection of any retained tree shall be undertaken in accordance with section 5 of the submitted Arboricultural Assessment dated February 2015 before any equipment, machinery or

materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written approval of the local planning authority.

Appendix JS5

Appeal Decision: Coombebury Cottage, Dunsfold (May 2024)





Appeal Decision

Inquiry Held on 27-29 February and 1 March 2024

Site visit made on 1 March 2024

by G D Jones BSc(Hons) DipTP DMS MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 8th May 2024

Appeal Ref: APP/R3650/W/23/3332590

Land at Coombebury Cottage, Dunsfold Common Road, Dunsfold GU8 4NB

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Mr D Sullivan of Sigma Homes against the decision of Waverley Borough Council.
 - The application Ref WA/2022/03032, dated 18 November 2022, was refused by notice dated 31 May 2023.
 - The development proposed is the demolition of existing buildings and the erection of up to 53 dwellings, public open space, landscaping and related infrastructure (all matters reserved except for access).
-

Decision

1. The appeal is allowed and outline planning permission is granted for the demolition of existing buildings and the erection of up to 53 dwellings, public open space, landscaping and related infrastructure (all matters reserved except for access) at Land at Coombebury Cottage, Dunsfold Common Road, Dunsfold GU8 4NB, in accordance with the terms of the application, WA/2022/03032, dated 18 November 2022, subject to the schedule of conditions appended.

Preliminary Matters

2. The proposals are for outline planning permission with access only to be determined at this stage and with appearance, landscaping, layout and scale reserved for future approval. Whilst not formally part of the scheme, I have treated the details relating to these reserved matters submitted with the appeal application as a guide as to how the site might be developed.
3. A legal agreement, dated 13 March 2024, made under s106 of the Town and Country Planning Act 1990 (the Legal Agreement) was submitted shortly after the Inquiry closed in accordance with an agreed timetable. I have had regard to it in my consideration and determination of the appeal.
4. The evidence refers both to National Landscapes and Areas of Outstanding Natural Beauty. For consistency and notwithstanding the phraseology of the National Planning Policy Framework (the Framework), I have used the term National Landscape in my decision.
5. Dunsfold Parish Council is preparing a Neighbourhood Plan. While a draft version was published, it has since been withdrawn. Accordingly, no more than very limited weight is carried by the emerging Neighbourhood Plan.

Main Issue

6. Through the submission of additional material by the appellant, the Council is now satisfied that, subject to mitigation, all of its reasons for refusal have now been resolved except for Nos 1 and 4. Accordingly, as I identified at the start of the Inquiry, the main issue is the effect of the proposed development on the character and appearance of the area, including in respect to trees.

Reasons – Main Issue

7. It is common ground between the main parties that the site forms part of a valued landscape in the terms of the Framework and that it is located within the setting of the Surrey Hills National Landscape (the SHNL). I have found no reason to conclude otherwise. It is also located within an Area of Great Landscape Value (the AGLV) and the proposed access would pass through common land, Dunsfold Common.
8. Both main parties have produced assessments of the landscape and visual effects that would result from the appeal scheme, which come to different conclusions. From all that I heard, saw and experienced during the appeal process, including during my site visit, in my view its effects in these respects would largely lie somewhere between each party's witness's assessments, generally more closely to those of the Council's witness on landscape and visual impact.
9. As a decision-making aid I have, nonetheless, largely adopted the Council's witness's assessment as a benchmark. I have not, though, adopted the Council's case in respect to the effect of the development on the SHNL for reasons which I shall set out below. Before doing so, though, I deal separately with the evidence in respect to trees in the terms of the fourth reason for refusal.
10. That refusal reason relates to the area's character and appearance specifically in terms of how the proposed quantum of built development would affect the reasonable provision of 'good sized' trees as part of the scheme. The evidence went into a considerable degree of detail on this matter. Nonetheless, it is important to keep in mind that the appeal scheme is for outline planning permission with all matters except for access reserved for future consideration.
11. It is very clear to me that there would be fairly substantial space around the site's margins for additional planting, including trees, were the development to proceed along the lines set out in the illustrative material submitted in support of the proposals, and as shown on the proposed parameters plan. With careful consideration and control of the reserved matters, particularly landscaping and layout, this could reasonably supplement and complement the existing mature planting around the site's margins. On this basis, a sympathetic context and setting for the development in character with the area could be achieved.
12. Based on the illustrative layout and having regard to the evidence of the arboricultural witnesses, in contrast, the scope for planting within the developed centre of the site would be much more restricted. Amongst other things, this is primarily because of the limited amount of space that would remain for planting amongst the developed areas, the space required for root and canopy spread and constraints on the size and height of trees in terms of securing good living conditions for residents.

13. Nonetheless, some opportunities for planting within that developed central area would remain, albeit on a very much more constrained basis than around the site's margins. Again, subject to careful consideration of the reserved matters a planting scheme, including suitable native tree species, for the developed centre of the site could be achieved that would be appropriate to the new residential context and complementary to the more substantial existing and proposed tree planting around the site's margins and the wider locality.
14. Accordingly, while trees form part of the assessment of the effect of the development on the area's character and appearance and the harm that would result, in the terms of the fourth reason for refusal trees do not add any particular additional weight to the totality of harm that would occur. Moreover, subject to the careful control and consideration of the reserved matters, there would be no conflict, in this regard, with Policy NE2 (Green and Blue Infrastructure) of the Waverley Borough Local Plan Part 1: Strategic Policies and Sites February 2018 (the Local Plan I), with Policy DM11 (Trees, Woodland, Hedgerows and Landscaping) of the Waverley Borough Local Plan Part 2: Site Allocations and Development Management Policies March 2023 (the Local Plan II) or with para 136 of the Framework.
15. Dunsfold is not located in the SHNL but is within its setting. The appeal site is reasonably well contained, due largely to the area's topography and the screening effect of vegetation, particularly woodland. It is also located some distance away from the SHNL. Consequently, at most, there would be only very limited views of the appeal development from the SHNL.
16. Indeed, in views from higher ground of the SHNL, due principally to its well-wooded context, Dunsfold village is currently a largely indistinguishable feature in the landscape. Given that the village is substantially bigger than the appeal development would be, subject to the careful control of the scheme's detailed design and appearance, for the reasons outlined above, I see no reason why this would not continue to be the case were the appeal development to proceed.
17. From outside the SHNL, there are much closer views of the site from which the appeal development would be more readily discernible with the SHNL forming part of the backdrop and/or context. They would though be limited due to the reasons referred to above. As the development would be experienced in the context of the existing village and bearing in mind the distance from the SHNL, in this sense the appeal scheme would also have no adverse impacts via its effect on the SHNL's setting.
18. For the foregoing reasons, subject to careful consideration of the reserved matters, overall, the appeal development would not have a harmful effect on the SHNL via its setting. Accordingly, it would not be at odds with Framework para 182. Nor would it conflict with the first part of Local Plan I Policy RE3 (Landscape Character – i. Surrey Hills Area of Outstanding Natural Beauty).
19. I also note that the site and much of the surrounding area, including Dunsfold village, fall within a candidate area in the on-going SHNL Boundary Review. This, though, does not confer any planning protection. Moreover, there can be no certainty regarding the likely outcome of the Review notwithstanding the area's current status. Accordingly, at this stage the site's inclusion within the SHNL candidate area attracts no more than limited weight.

20. Regarding character and appearance, my attention has also been drawn to a number of other appeal decisions, including those relating to land in the near vicinity of the site. These include an appeal concerning the proposed residential development of a site that adjoins the current appeal site, to the west (the adjoining appeal). That appeal was dismissed.
21. When making his decision, amongst other things, the Inspector for the 'adjoining appeal' stated that that wooded site helps provide a 'clearly important' vestigial link between Dunsfold Common and the broader landscape on the east side of the settlement, within which the current appeal site is immediately located. I have found no good reason to disagree with his assessment.
22. Layout and hence the siting of the built form within the current appeal site would be a matter reserved for future determination. Nonetheless, the proposed parameters plan shows a reasonably substantial gap of open land around the site's fringes would be maintained, particularly to the southernmost corner, thereby retaining a vestigial link. That link would, though, be much diminished, significantly narrowing the gap between the two clusters of development in Dunsfold, to the detriment of the character and appearance of the area.
23. Notwithstanding my conclusions regarding the SHNL and trees as outlined above, the proposed development would have a harmful effect on the character and appearance of the area, which is an AGLV and a valued landscape in the terms of the Framework. Consequently, in that regard, it would be at odds with Policies TD1 (Townscape and Design), RE1 (Countryside beyond the Green Belt) and RE3 (ii) (Landscape Character – ii. The AGLV) of the Local Plan I and with Policy DM15 (Development in rural areas) of the Local Plan II, as well as with para 180 of the Framework.

Other Matters

Planning Obligations

24. In the event that planning permission were to be granted and implemented the Legal Agreement would secure the provision of 16 on-site affordable housing units, comprising 4 First Homes, 2 Shared Ownership and 10 Affordable Rented / Social Rented dwellings; the provision of self-build and custom-build plots on-site at a rate of 5% of the development; the delivery of open space, play areas and a sustainable drainage system along with measures for their future maintenance; and payments towards the provision of subsidised travel on the local Digital Demand Responsive Transport system, as well as for monitoring the travel plan and the Legal Agreement.
25. The Council has submitted a detailed statement (the CIL Compliance Statement), which addresses the application of statutory requirements to most of the planning obligations within the Legal Agreement and also sets out the relevant planning policy support / justification. I have considered the planning obligations therein in light of Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) and government policy and guidance on the use of planning obligations. Having done so, I am satisfied that those obligations would be required by and accord with the policies set out in the CIL Compliance Statement. Overall, I am satisfied that all of those obligations are

directly related to the proposed development, fairly and reasonably related to it and necessary to make it acceptable in planning terms.

Spatial Strategy

26. The spatial strategy for the Borough is principally embodied in Policy SP2 (Spatial Strategy) of the Local Plan I. The site is located outside the settlement boundary for Dunsfold as defined by the development plan.
27. It is alleged that the proposed development would conflict with parts 1 and 4 of this Policy. I am not convinced that there would be conflict with Part 1 on the basis that the site is not *land of the highest amenity and landscape value*. Although these terms are not defined, the Policy does refer to *the Surrey Hills Area of Outstanding Natural Beauty and to safeguard the Green Belt*. As the site is not in either, it is reasonable to conclude that there is land of higher amenity and landscape value elsewhere in the Borough such that, notwithstanding its high value, the site is not of the *highest* value in the terms of Policy SP2 (1).
28. I recognise, though, that another Inspector in a recent appeal decision concerning proposed development at a site off Knowle Lane, Cranleigh (the Knowle Lane appeal) took a different approach, concluding that that site, which is neither National Landscape nor Green Belt but is valued landscape, should be treated as *land of the highest amenity and landscape value*. As a decision-making tool and in the interest of consistency, I have adopted the same approach in my decision in respect to Policy SP2 (1).
29. Part 2 of Policy SP2 allows *limited levels of development in/around* certain villages, including Dunsfold, *recognising that those villages not within Surrey Hills AONB or Green Belt offer more scope for growth*. Again, 'limited' is not quantified or defined. In my view, however, particularly in the context of the existing settlement and given the relative scale of the proposed development, the appeal scheme cannot reasonably be said to be 'limited'.
30. Accordingly, I have treated the proposed development as being in conflict with Policy SP2 (1) and (4) of the Local Plan I, such that it is contrary to the spatial strategy for the Borough.

Housing Land Supply

31. Although the main parties have differing views on the extent of the housing delivery shortfall, it is common ground between them that the Council cannot currently demonstrate a Framework compliant supply of housing land. While it may be lower, I have used the Council witness's figure of 3.5 years as a benchmark to assist in making my decision. Accordingly, that the appeal development would be at odds with the spatial strategy for the Borough and conflict, in that regard, with Policy SP2 of the Local Plan I as outlined above, currently carries limited weight.

Other Considerations

32. In addition to the appeal decision letters concerning the 'adjoining appeal' and the 'Knowle Lane appeal', the evidence refers to a range of decision letters in respect to other planning appeals and an Inspector's decision on an application made under Section 38 of the Commons Act 2006 for consent to carry out restricted works on common land. I am mindful of the need for consistency in

decision making, particularly in respect to appeals casework. Nonetheless, while I am not familiar with all of the circumstances of those other cases, they do appear to differ in at least some respects to the appeal development. Moreover, each application for planning permission must be determined on its individual merits. Consequently, none of those other cases have had a significant bearing on my decision.

33. I also note the concerns raised by the Council and other parties that if the appeal were to be allowed, the area's potential inclusion within an extended SHNL might be compromised. However, notwithstanding the evidence that is before me on the matter and the identified harm that would result from the appeal development to the character and appearance of the area, this seems unlikely given the modest scale of the site within the context of the much larger SHNL candidate area. Accordingly, this matter attracts no more than limited weight.
34. In addition to the main issue and the other foregoing matters, concern has been expressed locally, including by those who spoke at the Inquiry. Matters raised include that the site is not allocated in a Neighbourhood Plan and there are no plans to do so; existing public footpaths are not proposed to be incorporated into the scheme and the effect of the development on rights of way; further development should not be allowed following the completion of Gratton Close; infrastructure, services and facilities as existing and proposed are inadequate, including public transport, drainage, sewerage, education, retail and medical; the significance of the Digital on Demand Bus service has been overstated; the access would cross common land opposed by the Parish Council for which an application for consent to carry out restricted works on common land has been refused; and Coombebury Cottage should be preserved as a farm.
35. Other issues raised include the refusal of planning permission at the 'adjoining appeal' site; highway safety, congestion and access arrangements; the lack of a design code for the development; the adequacy of proposed play areas; quality of life and living conditions in the area during and after the construction stage, including in respect to noise and disturbance; the accuracy of the Design and Access Statement; the effects of the development on heritage assets, biodiversity, including protected species, and climate change, including compliance with the Council's Climate Change SPD; drainage and flooding; light pollution; the amount of housing that has been approved / planned for in recent years at Dunsfold and at Dunsfold aerodrome, and the scope for further growth; and whether adverse impacts would significantly and demonstrably outweigh the benefits.
36. These matters are largely identified and considered within the Council officer's report on the appeal scheme and were before the Council's decision-making officer/s when they determined the planning application. They were also before the Council when it prepared its evidence and when it submitted its case at the Inquiry, and are largely addressed in its evidence and in the statements of common ground. Other than as set out above, the Council did not conclude that they would amount to reasons to justify withholding planning permission. I have been provided with no substantiated evidence which would prompt me to disagree with the Council's conclusions in these respects subject to the imposition of planning conditions as discussed in the following section.

Conditions

37. The main parties jointly submitted a schedule of 33 conditions. It includes the standard time limit, implementation and reserved matters conditions. I have considered these in the light of government guidance on the use of conditions in planning permissions and made amendments accordingly. My conclusions are summarised below.
38. A condition requiring that the development is carried out in accordance with the approved plans, so far as they relate to matters that are not reserved for future consideration, and controlling compliance with the parameters, demolition and tree survey plans would be necessary to provide certainty and to protect the character and appearance of the area and the living conditions of local residents. To provide certainty and protect the character and appearance of the area, a condition limiting the number of dwellings permitted would also be necessary. For that reason and to help ensure a safe environment, a condition to secure design coding and secured by design would be necessary.
39. To provide certainty and protect the character and appearance of the area, a condition controlling ground levels and ridge heights at the developed site would be necessary. Conditions to control activities associated with the demolition / construction stage, including hours of working, would be necessary in the interests of protecting neighbours' living conditions, highway safety and trees. Further conditions to protect trees would be necessary in the interests of biodiversity and of protecting the character and appearance of the area.
40. Conditions to secure and maintain visibility splays at the vehicular access and provisions for vehicles to turn and park within the site would be necessary in the interests of highway safety. For that reason and to promote sustainable modes of transport, a condition to control details and secure the delivery of the proposed pedestrian access would be necessary. To further promote sustainable modes of transport, reduce the need for travel and in the interests of highway safety, conditions would be necessary to secure the implementation of a revised travel plan, as well as on-site cycle storage and e-vehicle charging infrastructure.
41. Conditions to control the details of surface water drainage and management, would be necessary to reduce flood risk, to control surface water run-off and in the interests of biodiversity. A condition would be necessary to ensure that features of archaeological interest are properly examined / recorded. Conditions to safeguard against contamination that might affect the site, including unsuspected contamination, along with any requisite remediation, would be necessary to protect the health and well-being of future occupiers and off-site receptors as well as in the interests of biodiversity.
42. To provide a suitable living environment and to help meet residents' recreational needs, a condition to secure on-site play space and equipment would be necessary. To improve water efficiency and respond to climate change, a condition to limit water consumption at the completed development would be necessary.
43. In the interests of protecting highway safety and to promote sustainable construction methods, a condition would be necessary to ensure compliance with a Waste Management Plan. Conditions to ensure compliance with a Construction and Environmental Management Plan, a Biodiversity Net Gain

Strategy and an amphibian mitigation and enhancement strategy, and to control external lighting would be necessary in the interests of biodiversity. Regarding this latter matter I note that the suggested condition Nos 24 and 31 are very similar, such that only the latter would be necessary. To support the development of high quality communication infrastructure, a condition to assist the delivery of high-speed broadband to the development would be necessary.

Planning Balance and Conclusion

44. For the purposes of making my decision I have treated Policies TD1, RE1 and RE3 of the Local Plan I and Policy DM15 of the Local Plan II as carrying full weight. On this basis, given the extent of harm identified above, the detrimental effect that the appeal development would have on the character and appearance of the area, which is a valued landscape and an AGLV, and the associated development plan policy conflict collectively carry significant weight against the appeal proposals.
45. As the Council cannot currently demonstrate a Framework compliant supply of housing land, the so-called tilted balance applies, as set out in para 11 of the Framework. It provides that 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 taken as a whole.
46. Even when applying the Council's 3.5 years supply figure, there is a serious and significant shortfall in housing delivery. It is unclear how and when this shortfall will be fully addressed. This process is likely to be challenging given the constraints at play. For instance, some 65% of the Borough lies within the SHNL, Green Belt or both.
47. Within this context the provision of up to 37 market homes - outside the SHNP and the Green Belt, at a settlement that has a reasonably good range of services and facilities - carries significant weight in favour of the appeal development. The appeal scheme would also deliver 16 affordable homes at the site. The evidence indicates that there is substantial unmet need for affordable housing in the Borough.
48. I note that the Inspector in the 'Knowle Lane appeal' appears to have combined the benefits of market and affordable housing delivery when making his decision. Nonetheless, based on the evidence before me, the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs. Accordingly, the proposed provision of affordable housing also carries its own significant weight in favour of the appeal development.
49. Additionally, there would be other more modest benefits associated with the appeal development were it to proceed. These include some of the matters that would be secured via the Legal Agreement, which each attract no more than limited weight. The provision of self-build and custom-build plots responds to a *desire to build one's own house* as the 'Knowle Lane appeal' Inspector put it, such that it attracts only limited weight. The delivery of open space and play areas, while primarily intended for use by residents, would benefit the wider community, as would the payment towards the local Digital Demand Responsive Transport.

50. There would also be benefits to the local economy during the construction phase and the additional population is likely to support the continuation of local services, and there would also be biodiversity net gain. These also attract no more than limited weight.
51. Although collectively weighty, all of the adverse impacts that would, or at least might, result from the appeal development, most notably via harm to the character and appearance of the area and the associated development plan policy conflict, would not significantly and demonstrably outweigh the benefits, particularly those associated with affordable and market housing delivery, when assessed against the policies in the Framework taken as a whole.
52. Accordingly, while perhaps not ideal, the appeal scheme would be sustainable development in the terms of the Framework for which there is a presumption in its favour. Consequently, it would also accord with Policy SP1 (Presumption in Favour of Sustainable Development) of the Local Plan I. Moreover, that it would represent sustainable development in the terms of the Framework is a material consideration that, in the particular circumstances of the case, outweighs the conflict with the development plan as a whole.
53. Therefore, subject to the identified conditions, it follows that the appeal should be allowed.

G D Jones

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

David Lintott, Counsel

Instructed by Lewis Jones of Legal Services,
Waverley Borough Council

He called

Robert Petrow BA(Hons)

Landscape and Visual Impact

DipLA CLMI

Ian Brewster FdSc(Arb)

Arboriculture

HNC(Arb) ISA LANTRA

Michael Eastham BA(Hons)

Planning

MTPI MRTPI

FOR THE APPELLANT:

Christopher Young, King's Counsel¹

Instructed by Clare Bartlett of Batcheller
Monkhouse

He called

Paul Lishman MLPM MSc

Landscape and Visual Impact

CLMI

Ben Oates TechArborA

Arboriculture

Clare Bartlett BSc(Hons)

Planning

DipTP MRTPI PIEMA

INTERESTED PERSONS:

Cllr Nigel Waterson

Chairman of Dunsfold Parish Council

Dr Barbara Judge

Interested Party

INQUIRY DOCUMENTS

ID1 - The appellant's opening statement

ID2 - The Council's opening statement

ID3 - Cllr Waterson's statement for Dunsfold Parish Council

ID4 - Dr Judge's statement

ID5 - Extract from GLVIA

ID6 - Mr Petrow's statement re appeal Ref APP/R360/W/22/3293777

ID7 - Mr Lishman's note on his methodology

ID8 - Bundle of duplicate drawings from elsewhere within the evidence

ID9 - Updated table from Mr Oates

ID10 - Tree Species Soil Volume Guide v2 – GreenBlue

ID11 – phlorum's letter on behalf of the appellant in response to Dr Judge

ID12 – Dr Judge's response to phlorum's letter

¹ Mr Young was assisted by Leanne Buckley-Thomson, Counsel, albeit that she did not act as advocate for the appellant.

SCHEDULE OF CONDITIONS FOR APPEAL REF APP/R3650/W/23/3332590:

- 1) Approval of the details of the scale, layout, appearance and landscaping (hereinafter called "the reserved matters") shall be obtained from the Local Planning Authority in writing before development is commenced and shall be carried out as approved and in accordance with the approved phasing plan.
- 2) Application for approval of reserved matters shall be made to the Local Planning Authority before the expiration of two years from the date of this permission. The development to which this permission relates must be begun not later than the expiration of two years from the final approval of reserved matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.
- 3) The submission of a reserved matter application pursuant to this outline planning permission shall together provide for no more than 53 dwellings.
- 4) The development shall be carried out in accordance with the following approved plans. No material variation from these plans shall take place unless otherwise first approved in writing by the Local Planning Authority, Drawing Nos:
 - 7233 PL-01 Rev C – Location Plan;
 - 7233 PL-09 Rev A – Parameters Plan;
 - BM-A2868A-01 – Demolition Plan;
 - 2202043-TS-001 Rev F – Proposed Access Arrangement and Visibility Splays; and
 - AR-4231 TSP-221006 – Tree Survey Plan with BS 5837 constraints.
- 5) Prior to, or alongside the submission of the Reserved Matters of the dwellings hereby permitted a Design Code shall be submitted to and approved in writing by the Local Planning Authority – which shall also outline the measures to achieve Secure by Design Gold or Silver Accreditation. The subsequent detailed design of the dwellings shall be in accordance with the approved Code.
- 6) Hours of construction, demolition and site clearance including deliveries to and from the site shall be limited to 08:00 – 18:00 Monday to Friday; 08:00 – 13:00 on Saturdays and no work on Sundays and Bank or Public Holidays.
- 7) No development shall take place on-site until a detailed levels plan, clearly identifying existing and proposed ground levels and proposed ridge heights, has been submitted to and approved in writing by the Local Planning Authority. This shall include details of any earthworks including the proposed grading and mounding of land areas, the levels and contours to be formed, showing the relationship of proposed mounding to existing vegetation, encroachment of tree root protection areas and surrounding landform. Development shall be carried out in accordance with the approved details.
- 8) Any reserved matters application relating to landscaping shall be accompanied by an Arboricultural Method Statement (AMS). The development shall be carried out in complete accordance with the approved AMS and Tree Protection Plan (TPP). The Local Planning Authority shall be provided with a minimum of two weeks' written notice to the commencement date of demolition/construction activities. All protection measures shall strictly accord

with the approved TPP and AMS. The Local Planning Authority shall determine the detail within the written notice and if satisfactory shall provide written approval for the development to proceed.

- 9) Prior to the commencement of demolition/construction, an arboricultural scheme of regular site monitoring, including implementation, shall be submitted to and approved in writing by the Local Planning Authority. The approved site monitoring details shall be applied throughout the life of the development after the tree protection written notice has been approved in writing by the Local Planning Authority.

Details of site monitoring shall include:

- Expected date of first and future tree protection checks to start at least one month after commencement of demolition/construction;
 - Name of appointed arboriculturist/representative responsible for site monitoring;
 - Professional supervision of construction events within Root Protection Areas; and
 - Frequency of monitoring throughout the demolition/construction period; and
 - The development shall be carried out in accordance with the approved Arboricultural Method Statement, arboriculture site supervision, approved recommendations, and tree/soil remediation.
- 10) No part of the development shall be first occupied unless and until the proposed vehicular access to Dunsfold Common Road has been constructed and provided with visibility zones in accordance with the approved plans and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1.05m high.
- 11) No part of the development shall be first occupied unless and until the proposed new footways on Dunsfold Common Road have been constructed in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority, to provide minimum footway widths of 1 metre on the section south of the access and 1 metre to the north and including the new uncontrolled pedestrian crossing indicated on Drawing No 2202043-TS-001 Rev F.
- 12) The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.
- 13) The development hereby approved shall not be first occupied unless and until each of the proposed dwellings are provided with a fast-charge Electric Vehicle charging point (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and thereafter retained and maintained to the satisfaction of the Local Planning Authority. These details may be addressed as part of a future, reserved matters application.

- 14) No development shall commence until a Construction Transport Management Plan, to include details of:
 - a) Parking for vehicles of site personnel, operatives and visitors;
 - b) Loading and unloading of plant and materials;
 - c) Storage of plant and materials;
 - d) Programme of works (including measures for traffic management);
 - e) Provision of boundary hoarding behind any visibility zones;
 - f) HGV deliveries;
 - g) Vehicle routing;
 - h) Measures to prevent the deposit of materials on the highway;
 - i) Before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused; and
 - j) On-site turning for construction vehicles, has been submitted to and approved in writing by the LPA. Only the approved details shall be implemented during the construction of the development.
- 15) The development hereby approved shall not be first occupied unless and until facilities for the secure, covered parking of bicycles have been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and thereafter the said approved facilities shall be retained and maintained to the satisfaction of the Local Planning Authority.
- 16) The development hereby approved shall not be first occupied unless and until a revised Travel Plan is submitted to and approved in writing by the Local Planning Authority. The approved Travel Plan shall be implemented prior to occupation of the development, and thereafter it shall be maintained and developed to the satisfaction of the Local Planning Authority.
- 17) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design shall satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, the National Planning Policy Framework and the Ministerial Statement on SuDS. The required drainage details shall include:
 - a) Evidence that the proposed solution shall effectively manage the 1 in 30 (+40% allowance for climate change) & 1 in 100 (+45% allowance for climate change) storm events and 10% allowance for urban creep, during all stages of the development. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 9.7 l/s;
 - b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Including details of the proposed basins and swales and any lining requirements;
 - c) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site shall be protected from increased flood risk;
 - d) Details of drainage management responsibilities and maintenance regimes for the drainage system; and

- e) Details of how the drainage system shall be protected during construction and how runoff (including any pollutants) from the development site shall be managed before the drainage system is operational.
- 18) Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the approved scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.
- 19) No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Local Planning Authority.
- 20) Prior to commencement of development, other than that required to be carried out as part of demolition or approved scheme of remediation, the following shall be submitted to and approved in writing by the Local Planning Authority:
- a) An investigation and risk assessment, in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The investigation and risk assessment shall be undertaken by a competent person as defined in Annex 2: Glossary of the National Planning Policy Framework; and
 - b) If identified to be required, a detailed remediation scheme shall be prepared to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property. The scheme shall include:
 - All works to be undertaken;
 - Proposed remediation objectives and remediation criteria;
 - Timetable of works; and
 - Site management procedures.
- The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The remediation works shall be carried out in strict accordance with the approved scheme. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.
- 21) Upon completion of the approved remediation works, a verification report demonstrating the effectiveness of the approved remediation works carried out shall be completed in accordance with Condition 22 and shall be submitted to the Local Planning Authority for approval prior to occupation of the development.
- 22) Following commencement of the development hereby approved, if unexpected contamination is found on-site at any time, other than that identified in accordance with Condition 20, the Local Planning Authority shall be immediately notified in writing and all works shall be halted on the site. The

- following shall be submitted and approved in writing by the Local Planning Authority prior to re-commencement of works:
- a) An investigation and risk assessment, undertaken in the manner set out in Condition 20 of this permission;
 - b) Where required, a remediation scheme in accordance with the requirements as set out in Condition 20(b); and
 - c) Following completion of approved remediation works, a verification report, in accordance with the requirements as set out in Condition 21.
- 23) Prior to the commencement of development, a scheme for the provision of a Local Equipped Area of Play (LEAP) and Local Areas of Play (LAPs) including the timetable for their implementation shall be submitted to and approved in writing by the Local Planning Authority. The LEAP shall be a minimum size of 400 square metres and the LAPs a minimum size of 100 square metres. The LEAP and the two LAPs shall be implemented in accordance with the approved scheme and timetable.
- 24) Prior to the occupation of the dwellings, details shall be submitted to and approved in writing by the Local Planning Authority to confirm that the dwellings have been completed so that the potential consumption of wholesome water by persons occupying a dwelling shall not exceed 110 litres of water per person per day.
- 25) Prior to the commencement of construction and demolition activities (including groundworks) a Waste Management Plan shall be submitted and approved in writing by the Local Planning Authority, demonstrating that:
- a) The waste generated during the construction, demolition and excavation phase of development is limited to the minimum quantity necessary;
 - b) Opportunities for re-use and for the recycling of construction, demolition and excavation residues and waste on-site are maximised;
 - c) On-site facilities to manage the waste arising during the operation of the development of an appropriate type and scale have been considered as part of the development; and
 - d) Integrated storage to facilitate re-use and recycling of waste is incorporated in the development in compliance with Surrey Waste Local Plan 2020.
- 26) There shall be no burning of any waste or other materials on the site during the construction phase.
- 27) Prior to the first occupation of the dwellings hereby permitted the highest available speed broadband infrastructure shall be installed and made available for use.
- 28) No development shall take place until a detailed Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include the final biodiversity net gain assessment, using the Statutory Biodiversity Metric Calculation Tool, which demonstrates how the proposal will provide a biodiversity net gain. The CEMP shall be based on the proposed impact avoidance, mitigation and enhancement measures specified in the above referenced report and shall include, but not be limited to the following:
- a) Description and evaluation of features to be managed;

- b) Ecological trends and constraints on-site that might influence management;
 - c) Aims and objectives of management;
 - d) Appropriate management options for achieving aims and objectives;
 - e) Prescriptions for management actions, together with a plan of management compartments;
 - f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period;
 - g) Details of the body or organisation responsible for implementation of the plan;
 - h) Ongoing monitoring and remedial measures;
 - i) Legal and funding mechanisms by which the long-term implementation of the plan shall be secured by the applicant with the management body(ies) responsible for its delivery;
 - j) Monitoring strategy, including details of how contingencies and/or remedial action shall be identified, agreed, and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme;
 - k) Final Biodiversity Net Gain Assessment, to include Statutory Biodiversity Metric Calculation Tool with full detail of off-site strategy;
 - l) Amphibian Mitigation and Enhancement Strategy;
 - m) Risk assessment of the potentially damaging construction activities;
 - n) Practical measures to avoid and reduce impacts during construction;
 - o) Location and timing of works to avoid harm to biodiversity features;
 - p) Responsible persons and lines of communication; and
 - q) Use of protective fences, exclusion barriers and warning signs.
- 29) Prior to, or alongside the submission of, any reserved matters application relating to scale, layout, appearance and landscaping (as required by Condition 1), a bat mitigation strategy and updated bat surveys of trees shall be submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved strategy, including any mitigation measures identified as necessary. The updated bat surveys of trees shall include a bat preliminary ground level tree roost assessment of all trees to be removed or impacted. Bat presence/likely absence survey shall be carried out on all trees which have been assessed as having high or moderate suitability to support roosting bats in line with good practice guidelines for bat surveys.
- 30) The development hereby permitted shall not be occupied until a detailed scheme of external lighting has been submitted to and approved in writing by the Local Planning Authority (LPA). The scheme shall achieve lighting to conform with at least Zone 1b as defined by the Institution of Lighting Professionals and Guidance Note 8 – Bats and Artificial Lighting (GN08/2023). The development shall be carried out in accordance with the approved details. No additional sources of external lighting shall be installed on the development without the prior written approval of the LPA.
- 31) Prior to the commencement of development (apart from any site clearance and demolition), a Biodiversity Net Gain (BNG) Strategy, shall be submitted to

and approved in writing by the Local Planning Authority. This strategy shall demonstrate how a minimum 10% net gain shall be delivered and how it shall be managed for 30 years. The approved BNG Strategy shall be strictly adhered to and implemented in full for its duration and shall contain the following:

- a) Description and evaluation of the features to be managed;
 - b) Ecological trends and constraints on-site that may influence management;
 - c) Aims, objectives and targets for management - links with local and national species and habitat action plans;
 - d) Detail of habitat creation;
 - e) Details of how the minimum BNG shall be delivered including details of any habitat banking arrangements and off-site provision necessary to secure achievement of the overall target and how this is to be secured;
 - f) Description of the management operations necessary to achieving aims and objectives;
 - g) Prescriptions for management actions;
 - h) Preparation of a works schedule, including annual works schedule;
 - i) Details of the monitoring needed to measure the effectiveness of management;
 - j) Details of the timetable for each element of the monitoring programme;
 - k) Details of the persons responsible for the implementation and monitoring;
 - l) Mechanisms of adaptive management to account for necessary changes in work schedule to achieve the required targets; and
 - m) Reporting on year 1, 2, 5, 10, 20 and 30, with biodiversity reconciliation calculations at each stage.
- 32) Prior to, or alongside the submission of any reserved matters application relating to scale, layout, appearance and landscaping, an amphibian mitigation and enhancement strategy shall be submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved strategy, which shall include, but not be limited to:
- Terrestrial Habitat Suitability Assessment for Amphibians;
 - An amphibian tunnel under the access road and if required, guiding fences;
 - Installation, management and maintenance plan for amphibian tunnel under the access road;
 - Appropriately designed and located gully pots, and dropped and wildlife friendly kerbs;
 - Evidence of terrestrial habitat corridors for amphibians;
 - Sensitive Lighting Strategy;
 - Provision of aquatic habitat on-site, which is suitable for breeding amphibians; and
 - Method Statement for activity within suitable amphibian habitat.

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