

Redevelopment for Office Purposes of Redundant Farm Buildings

at

Manor Farm
Cricket Malherbie
Ilminster
Somerset TA19 0PW

Transport and Access Issues

May 2008

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- 1 Site Location Plan

1.0 INTRODUCTION

- 1.1 David Walpole Associates have been appointed by T S Jeanes & Partners ("the applicant") to advise on the transport and access issues associated with the company's proposal to convert existing redundant barns to office use at Manor Farm, Cricket Lane, Cricket Malherbie, Ilminster.
- 1.2 The redevelopment proposals are the subject of a full planning application (application number 07/01185/COU) submitted to South Somerset District Council ("the District Council") in March 2007 by the project architect John Wratten ("the architect"). For the purposes of determining this planning application the District Council is the local planning authority and Somerset County Council ("the County Council") is the local highway authority.
- 1.3 The redevelopment proposals have been the subject of an extensive dialogue between the applicant, the architect and the planning and highway officers. Two of the three buildings which form the development are listed as being of special architectural and historic interest. The third building, a former farm shop, is not listed. Minor amendments have been made to the scheme following submission of the planning application to address comments made by the various officers.
- 1.4 The County Council, as the local highway authority, submitted its consultation response to the District Council by letter dated 3 May 2007 a copy of which is attached at Appendix 1 to this report. The County Council recommends that planning permission be refused for the following reasons:

"1 The proposed development would be located where it is remote from adequate services, employment, education, public transport, etc, and will therefore increase the need for journeys to be made by private vehicles which is non-sustainable and in conflict with advice given in PPG13, RPG10 and Policy STR1 and STR6 of the Somerset and Exmoor National Park Joint Structure Plan Review, April 2000.

2 The approach roads by reason of their restricted width and poor alignment are considered unsuitable to serve as a means of access for the type of traffic likely to be generated by the proposed development."

1.5 Despite representations made by both the applicant and the project architect the County Council stands by its original recommendation for refusal on the above grounds.

1.6 In the remainder of this report we address the issues raised by the reasons for refusal suggested by the County Council. The report is structured as follows:

- In Section 2 we describe the existing and proposed development by reference to the changing nature of farming in the United Kingdom and what this has meant for Manor Farm.
- In Section 3 we describe the transport related policy context against which the redevelopment proposals should be evaluated. We consider whether or not the redevelopment proposals comply with national, regional and local policies which seek to promote sustainable development. In doing so we address the County Council's main concern which is that, in their opinion, the site is in an unsustainable and therefore unsuitable location.
- In Section 4 we consider the likely traffic impact of the redevelopment proposals. We consider the number and type of vehicles likely to be generated by the proposed office use and compare this with the past traffic generation of the site.
- Finally in Section 5 we present our conclusions.

2.0 THE EXISTING AND PROPOSED DEVELOPMENT

Site Location

- 2.1 The general site location is shown in Figure 1. The site is located in the centre of Cricket Malherbie and is approximately 1.75 miles to the south of Ilminster and 2.75 miles to the north-east of Chard.
- 2.2 Manor Farm comprises a mixed farm extending to approximately 560 acres. The farmstead is located in Cricket Malherbie and comprises the original farm complex located on the western side of Cricket Lane opposite the Parish Church and more modern farm buildings on the eastern side of Cricket Lane to the north and south of the Church. The application site is located in the original farm complex on the western side of Cricket Lane.
- 2.3 The site is located within the Cricket Malherbie Conservation Area.

The Existing Development

- 2.4 The site comprises three buildings in part of the original farm complex adjoining the western side of Cricket Lane. The three buildings form a courtyard and comprise:
- the former single storey farm shop fronting onto Cricket Lane and extending to approximately 45 sqm
 - the single storey tie stalls sited at right angles to the road and forming the northern side of the courtyard. This building extends to approximately 160 sqm.
 - the two-storey granary with a single storey extension which together form the southern side of the courtyard and extend to approximately 310 sqm.

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- 2.5 Vehicular and pedestrian access to the site is provided via three separate accesses to the complex of buildings on the western side of Cricket Lane. There is also an area of hard standing along the western side of Cricket Lane in front of the buildings.
- 2.6 The increasing costs associated with farming, and livestock farming in particular, mean that only very efficient farms can now remain economically viable. The farming activities that in the past were undertaken in the three traditional buildings now take place in more modern facilities in the farm complex. The traditional buildings are expensive to maintain and do not comply with the standards required in modern farm facilities. These three buildings no longer perform any useful agricultural purpose.

The Proposed Development

- 2.7 It is proposed to convert the three buildings so as to provide a total of 515 sqm of office space in a landscaped courtyard setting.
- 2.8 A parking area is to be provided to the north of the buildings. The car park will provide 24 car parking spaces (2 disabled and 22 conventional) and will utilise the existing, northern, access on Cricket Lane. A pedestrian link will be provided between the car park and the office buildings.
- 2.9 The County Council is *"satisfied that a safe access from the site can be formed and adequate parking and turning facilities provided"* (see e-mail dated 7 September 2007 from Mr McWilliams, Somerset County Council, to the project architect a copy of which is attached at Appendix 2).

3.0 TRANSPORT RELATED POLICY CONTEXT

3.1 In this section of the report we set out the sequence of planning policy that is considered relevant to the consideration of the transport related aspects of this application and show that the redevelopment proposals comply with national, regional and local policy.

3.2 The development proposals have been formulated against a policy background that seeks to promote sustainable development. National, regional and local policy and guidance seeks to promote sustainable development by:

- locating development so as to reduce the overall need to travel
- encourage the use of sustainable modes of travel (i.e. walking, cycling and public transport) in preference to the private car and particularly single occupancy private car trips
- make the most efficient use of land and resources
- integrating land-use and transport planning so as to help achieve the government's wider social, economic and environmental objectives

National Policy

3.3 The overarching policy framework in England comprises Planning Policy Guidance (PPGs) notes which are slowly being superseded and replaced by Planning Policy Statements (PPSs). The most relevant documents in this instance comprise:

- PPS1 Delivering Sustainable Development (2005)
- PPG4 Industrial, Commercial Development and Small Firms (1992)
- Consultation Paper on a New Planning Policy Statement 4: Planning for Sustainable Economic Development (December 2007)

- PPS 7 Sustainable Development in Rural Areas
- PPG13 Transport (2001)

PPS 1 Delivering Sustainable Development

3.4 The Government places great emphasis on the importance of delivering sustainable development through the planning process. The opening sentence of paragraph 3 states "*Sustainable development is a core principle underpinning planning.*"

Paragraph 5 goes on to state:

"Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:

- *making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;*
- *contributing to sustainable economic development;*
- *protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;*
- *ensuring high quality development through good and inclusive design, and the efficient use of resources; and,*
- *ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community."*

3.5 Paragraph 27 sets out the general approach that planning authorities should follow when preparing development plans, we consider that criteria (i) – (viii) are particularly relevant in this case, these state:

"27 In preparing development plans, planning authorities should seek to:

- Promote national, regional, sub regional and local economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative business, commercial and industrial sectors.*

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- ii. *Promote urban and rural regeneration to improve the well-being of communities, improve facilities, promote high quality and safe development and create new opportunities for the people living in those communities. Policies should promote mixed-use developments for locations that allow the creation of linkages between different uses and can thereby create more vibrant places.*
 - iii. *Promote communities which are inclusive, healthy, safe and crime free, whilst respecting the diverse needs of communities and the special needs of particular sectors of the community.*
 - iv. *Bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs to housing, for industrial development, for the exploitation of raw materials such as minerals, for retail and commercial development, and for leisure and recreation-taking into account issues such as accessibility and sustainable transport needs, the provision of essential infrastructure, including for sustainable waste management, and the need to avoid flood risk and other natural hazards.*
 - v. *Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, while recognizing that this may be more difficult to rural areas.*
 - vi. *Focus developments that attract a large number of people, especially retail, leisure and office development, in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development.*
 - vii. *Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges.*

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- viii. *Promote the more efficient use of land through higher density, mixed-use development and the use of suitably located previously developed land and buildings. Planning should seek actively to bring vacant and underused previously developed land and buildings back into beneficial use to achieve the targets the Government is set to the development on previously-developed land."*
- 3.6 We consider that the redevelopment proposals serve to deliver each of the aims set out in PPS1 in a way that will reduce the overall need to travel, protect and enhance the physical environment and support the local community.
- 3.7 It should be noted that this overarching statement of national policy recognizes that in rural areas it will be more difficult to provide access on foot, bicycle or public transport rather than by car. This national policy does not preclude development in rural areas simply because access by modes of transport other than the car is more difficult than it would be in an urban area.
- 3.8 This policy is expanded upon in the Planning and Climate Change Supplement to PPS1 (December 2007). Paragraph 25 of this document explains how planning authorities should select land for development. The final sentence of this paragraph states:
- "When considering the need to secure sustainable rural development, including employment and affordable housing opportunities to meet the needs of local people, planning authorities should recognize that a site may be acceptable even though it may not be readily accessible other than by the private car."*
- 3.9 The application site is within easy cycling distance of Ilminster and Chard and is located within the village of Cricket Malherbie. The redevelopment proposals are intended to serve a local need, demonstrated by the fact that even at this very early stage in the planning process interest has been expressed by a local business wishing to expand into the new premises should they be granted permission.
- 3.10 Clearly therefore the redevelopment proposals accord with the overarching objectives of PPS1.

PPG4 Industrial, Commercial Development and Small Firms (1992)

3.11 The opening paragraph to this PPG (Para 1) states:

"One of the Government's key aims is to encourage continued economic development in a way which is compatible with its stated environmental objectives. Economic growth and a high quality environment have to be pursued together."

3.12 Locational considerations are primary to the way business operates and this is recognised in Paras 9-12 of PPG4. Paragraph 10 states:

"Development plans offer the opportunity to:

- encourage new development in locations which minimise the length and number of trips, especially by motor vehicles;*
- encourage new development in locations that can be served by more energy-efficient modes of transport (this is particularly important in the case of offices, light industrial development, and campus style development such as science and business parks likely to have large numbers of employees);*
- discourage new development where it would be likely to add unacceptably to congestion;*
- locate development requiring access mainly to local roads away from trunk roads, to avoid unnecessary congestion on roads designed for longer distance movements."*

3.13 The redevelopment proposals comply with each of these criteria in that this is a small-scale office development serving a primarily local need which will reduce the overall need to travel. The site is located in a rural area but is still accessible by bicycle and on foot/public transport.

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- 3.14 Paragraph 13 states that unless the proposed development would cause demonstrable harm to interests of acknowledged importance the development should be allowed. Furthermore, it continues to state that development control practices should not place unjustifiable obstacles in the way of development, which is necessary to provide investment, jobs and homes.
- 3.15 Paragraph 14 recognizes that many business uses, including the office use proposed, can be carried out in rural areas *"without causing unacceptable disturbance to increased traffic, noise, pollution or other adverse effects"*. This paragraph goes on to say that *"individual planning decisions will of course depend on such factors as the scale of development, the nature of the use of the site and its location."*

Consultation Paper on a New Planning Policy Statement 4: Planning for Sustainable Economic Development (December 2007)

- 3.16 The draft PPS4 recognizes the important needs of business, employment and economic benefits and explains that the planning system should contribute towards improving productivity and the UK's long-term economic performance.
- 3.17 One of the Government's key policy outcomes of economic development as set out in Para 6(iv) is to *"deliver sustainable development, the key principles of which, including responding to climate change, are set out in Planning Policy Statement 1 and the annex to PPS 1 on Climate Change"*.
- 3.18 We have previously demonstrated that the redevelopment proposals comply with the policies set out in PPS 1 and the Climate Change annex to that document.
- 3.19 Paragraph 18 explains how regional planning bodies and local planning authorities should prepare policies to support sustainable economic development in their areas. In respect of office development it states:

"For office (B1 a) development, give preference to the identification of sites in or on the edge of town centres for large office development, consistent with the sequential approach in PPS 6, whilst recognizing that market demand will influence office location. Opportunities for smaller scale office development should be promoted taking account of local circumstances and wider benefits that may arise from the proposal. Where office development is ancillary to other forms of economic development not located in the town centre there should be no requirement for such offices to be located in the town centre."

- 3.20 The redevelopment proposals are for a small scale office development. It is clear from the above policy that developments of this type and scale do not have to be located in or on the edge of a town centre although town centres are the preferred location for large scale developments.
- 3.21 It is also clear that planning authorities should promote small-scale office development taking into account local circumstances and the wider benefits that may arise. There has already been a clear expression of interest from a local business wanting to relocate and expand into the new premises. At a site meeting with the local Councillor and officers of the district and county councils the District Council's economic development team leader confirmed that there is very little office space available in Chard and Ilminster.
- 3.22 Given the clear local demand, and the absence of alternative small-scale office accommodation locally, it is likely that this demand will have to be met further afield which will increase the overall need to travel and have a potentially detrimental impact on the local economy.
- 3.23 Paragraphs 28 to 33 of draft PPS4 explain how *"local planning authorities should adopt a positive and constructive approach towards proposals for economic development, operating within the context of the plan led system"*.
- 3.24 Paragraph 32 considers rural areas, it states:

"In rural areas, recognizing that accessibility-whether by private transport, public transport, walking and cycling-is a key consideration, local planning authorities should:

- *support farm diversification schemes for business purposes that help to sustain agricultural enterprise and are consistent in their scale of their rural location and environmental impact;*
- *recognize that a site may be an acceptable location for development even though it may not be readily accessible by public transport;*
- *support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors; and*
- *support small-scale economic development where it provides the most sustainable option in villages that are remote from, and have poor transport links with, local service centres."*

3.25 The supporting statement submitted with the planning application and the subsequent "farm plan" dated 4 April 2007 together clearly explain that the decision to redevelop the redundant farm buildings for office purposes rather than residential was taken in order to support the long-term profitability of the farm.

3.26 The second bullet point is particularly pertinent in this case given the County Council's recommendation as set out in its consultation response (letter dated 3 May 2007 attached at Appendix 1). In this consultation response the County Council states that "public transport services are in frequent". Clearly the fact that the site is not easily accessible by public transport does not automatically mean that the site is an unacceptable location for economic development.

PPS 7: Sustainable Development in Rural Areas (2004)

3.27 The Government's key objectives for rural areas as set out in the first section of this PPS include: raising the quality of life and the environment in rural areas; promoting more sustainable patterns of development; and promoting the economic performance of rural areas. The redevelopment proposals will satisfy each of these objectives.

3.28 Paragraph 5 deals with economic development and employment, it states:

"5 Planning authorities should support a wide range of economic activity in rural areas. Taking account of regional priorities expressed in RSS, and in line with the policies in paragraphs 2-4 above, local planning authorities should:

- i. identify in LDDs suitable sites for future economic development, particular in those rural areas where there is a need for employment creation and economic regeneration;*
- ii. set out in LDDs their criteria for permitting economic development in different locations, including the future expansion of business premises, to facilitate healthy and diverse economic activity in rural areas."*

3.29 Clearly local planning authorities are required to support economic activity in rural areas.

3.30 Paragraph 17 and 18 deal with the reuse of buildings in the countryside and state that reuse for economic development purposes will usually be preferable to residential development.

3.21 Paragraphs 30 and 31 deal with farm diversification and state that local planning authorities should *"be supportive of well conceived farm diversification schemes for business purposes that contribute to sustainable development objectives and helped to sustain the agricultural enterprise, and are consistent in their scale and with their rural location. This applies equally to farm diversification schemes around the fringes of urban areas."*

3.32 As explained previously the proposed redevelopment will support the existing farm, and is sustainable in transport terms since it will serve to reduce the overall need to travel.

PPG13 Transport (2001)

3.33 The key objectives of this PPG as set out in paragraph 4 are to:

- promote more sustainable transport choices for both people and moving freight;
- promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and
- reduce the need to travel, especially by car.

3.34 Paragraphs 40 to 44 deal with development in rural areas. Paragraph 43 is particularly relevant in this case, it states:

"43 In order to reduce the need for long-distance out-commuting to jobs in urban areas, it is important to promote adequate employment opportunities in rural areas. Diversification of agricultural businesses is increasingly likely to lead to proposals for conversion or reuse of existing farm buildings for other business purposes, possibly in remote locations. PPG7 (now PPS7) indicates that for development related to agriculture and for farm diversification, appropriate new buildings may also be acceptable. In plan policies and development control decisions, local authorities should encourage farm diversification proposals particularly, but not exclusively, where this enables access by public transport, walking and cycling. They should be realistic about the availability, or likely availability, of alternatives to access by car. Similarly, they should not reject proposals where small-scale business development or its expansion would give rise to only modest additional daily vehicle movements, in comparison to other uses that are permitted on the site, and the impact on minor roads would not be significant."

3.35 Clearly the redevelopment proposals fully comply with each aspect of the policy objectives set out in this statement of national policy:

- We know that there is a local demand for office space of this size and that there is no suitable space available even in the local towns (i.e. Chard and Ilminster). Long-distance out-commuting to other areas is the inevitable consequence.
- The proposals comprise a farm diversification scheme that will support the existing agricultural business.

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- Although the site is not on a bus route the site is within easy cycling distance of both Chard and Ilminster and is accessible on foot from the immediate surrounding area.
 - The proposals would generate very little traffic and have no noticeable detrimental impact on the operation of the surrounding highway network.

Regional Planning

- 3.36 The regional planning guidance for the South West is RPG 10 published in 2001. Under the provisions of the Planning & Compulsory Purchase Act 2004 the RPG became the regional spatial strategy (RSS10) and now forms part of the statutory development plan.
- 3.37 In June 2006 The Draft Regional Spatial Strategy for the South West 2006-2026 was published. This was subject to an Examination in Public between April and July 2007. The Panel Report was published in December 2007 and is currently with the Secretary of State.
- 3.38 The current RSS, the draft RSS and the panel report all support the principle of permitting small-scale economic development in rural areas particularly in conjunction with farm diversification.
- 3.39 Policy SS 19: Rural Areas of the current RSS explains that market towns should be the focal points for development in rural areas and that outside market towns development should be small scale and take place primarily within or adjacent to existing settlements. The policy goes on to say that local authorities in their development plans should set out policies for supporting sustainable farm diversification schemes which help to maintain the viability of the agriculture sector and rural economic vitality.

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- 3.40 The redevelopment proposals clearly comply with this policy in that they are small-scale, located within the village of Cricket Malherbie (indeed they are within the village conservation area) and represent a farm diversification scheme that will support the existing agricultural business.
- 3.41 Section 8 of the RSS sets out the Regional Transport Strategy. Paragraphs 8.20-8.21 and Policy TRAN 7 deal with rural areas. It is explained that the RPG (now RSS) *"supports a living countryside based on a viable rural communities with access to housing, jobs, facilities and services in a way that helps minimise social exclusion"* (paragraph 8.20). It goes on to say that *"meeting the transport needs of rural areas present particular challenges arising from the changing nature of the rural economy and the separation of home and workplace"*(paragraph 8.20). It continues *"many rural areas will continue to be dependent on private transport and opportunities to steer development to locations that can be well serviced by public transport may be limited"* (paragraph 8.21). Policy TRAN 7 explains how *"local authorities, transport operators and other agencies should work together to encourage more sustainable travel choices and reduce travel distances in rural areas"*.
- 3.42 Clearly the RSS recognizes the need to provide economic opportunities in rural areas which will serve to support local communities and reduce the overall need to travel.
- 3.43 The Foreword to the draft RSS (published 2006) explains that *"the region is continuing to grow and we are facing up to this future with a strategy which aims to locate development in places where jobs and homes can be more imbalanced. This will, we hope, in turn, reduce the need to travel so much by car."*
- 3.44 Policy SD4 Sustainable Communities seeks to create sustainable communities by, amongst other proposals,
- linking the provision of homes, jobs and services so that cities, towns and villages and groups of places have the potential to become more self contained and the need to travel is reduced; and
 - encouraging business activity and particularly small businesses.

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- 3.45 Paragraph 3.2.2 explains that *"the most effective way for the draft RSS to deal with future growth pressures and contribute to a sustainable future for the region is to guide most development to a relatively small number of places. This approach does not mean that the needs of more rural areas, and the many villages and small towns, where most of the region's population live, will be neglected. Adequate provision is made for the new development needed to maintain their vitality as more self contained, balanced communities."*
- 3.46 The Panel Report maintains the general thrust of these sections of the draft RSS albeit with changes to the text so that paragraphs 3.1.2 and 3.2.2 are merged.

Somerset & Exmoor National Park Joint Structure Plan Review 1991-2011

- 3.47 The Structure Plan was adopted in April 2000 and will eventually be superseded by the RSS and the emerging Local Development Framework for South Somerset.
- 3.48 The Structure Plan focuses developments on the 15 largest settlements in the structure plan area whilst also permitting some development in rural areas. Paragraph 3.15 states that:
- "The economic and social needs of the rural areas are provided through the encouragement of diversification in the local rural economy and the reuse of redundant farm buildings for small-scale employment and community purposes."*
- 3.49 Clearly the redevelopment proposals satisfy this requirement.
- 3.50 In its consultation response on the planning application (Appendix 1) the County Council recommends that planning permission be refused because the proposals conflict with Policies STR1 and STR6 of the Structure Plan. These policies are set out below:

"Policy STR1 Sustainable Development

Development in Somerset and the Exmoor National Park should:

- *be of high quality, good design and reflect local distinctiveness;*
- *develop a pattern of land use and transport which minimises the length of journeys and the need to travel and maximises the potential for the use of public transport, cycling and walking;*
- *minimise the use of non-renewable resources;*
- *conserve biodiversity and environmental assets, particularly nationally and internationally designated areas;*
- *ensure access to housing, employment and services;*
- *give priority to the continued use of previously-developed land and buildings;*
- *enable access to people with disabilities."*

"Policy STR6 Development outside Towns, Rural Centres and Villages

Development outside Towns, Rural Centres and Villages should be strictly controlled and restricted to that which benefits economic activity, maintains or enhances the environment and does not foster growth in the need to travel."

- 3.51 The basis of the County Council's concern as expressed in the first recommended reason for refusal is that:

"The proposed development would be located where it is remote from adequate services, employment, education, public transport, etc, and will therefore increase the need for journeys to be made by private vehicles which is nonsustainable and in conflict with advice given in PPG13, RPG 10 and Policy STR1 and STR6 of the Somerset and Exmoor National Park Joint Structure Plan Review, April 2000."

- 3.52 The raft of national and regional policy, both existing and emerging, as described above clearly recognizes the need to provide employment opportunities in rural areas in order to reduce the overall need to travel whilst also recognizing that those journeys are likely to be undertaken by private vehicles rather than by public transport, walking or cycling.

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- 3.53 Indeed this is such an important consideration that the Panel Report on the draft RSS makes specific recommendations and changes to the employment/housing linkage as expressed in the draft RSS. The draft RSS essentially sought to provide *"balanced communities"* where significant urban extensions and new employment opportunities were provided in the same general area thus reducing the overall need to travel. The Panel were of the opinion that *"while a balance between employment growth and housing provision is desirable and will provide opportunities for shorter job trips, an overly rigid interpretation of self-containment is not required."* (Ref Para 4.0.16 of the Panel Report). The Panel went on to say that *"while we do not believe that self-containment is a practical objective, we do agree that every effort should be made to provide a range of local employment to avoid the creation of dormitories"* (Ref Para 4.0.17 of the Panel Report).
- 3.54 The redevelopment proposals are a small-scale development intended to satisfy a local demand as evidenced by expressions of interest already received even though the proposals have not yet received planning permission. The District Council's economic development officer has confirmed that there are no alternative facilities currently available in the immediate area including Chard and Ilminster. The inevitable consequence of not providing employment opportunities locally is that residents will have no alternative other than to travel longer distances to employment opportunities further afield and local businesses will have to relocate out of the area.
- 3.55 These issues are specifically addressed in the Joint Structure Plan. Paragraph 5.43 states:
- "The Joint Structure Plan seeks to focus a higher proportion of development towards the 15 main settlements. This strategy needs to be implemented sensitively to ensure that investment is not unduly drawn away from rural areas. The maintenance of rural employment opportunities will also minimise the need for commuting to work in larger, more distant centres."* (Our emphasis)
- 3.56 Policy 19 Employment and Community Provision in Rural Areas states:

"In rural areas provision should be made a development which creates or enhances local employment, shopping or community facilities, including development necessary for the purposes of agriculture and development associated with the diversification of agricultural units."

3.57 Paragraph 5.45 goes on to say:

"It is essential that employment opportunities are maintained and created in rural areas to help sustain rural communities and reduce the need to travel."

3.58 Contrary to what the local highway officer has said it is clear that the County Council's view is that the creation of employment opportunities in rural areas will reduce the overall need to travel rather than "fostering of growth in the need to travel" as stated in the consultation response (Appendix 1).

3.59 In our opinion it is clear that the redevelopment proposals fully comply with the County Council's policies as expressed in the Joint Structure Plan.

South Somerset Local Plan (April 2006)

3.60 Paragraphs 9.24 - 9.28 of the Local Plan and Policy ME5 deal with "farm/rural diversification". Policy ME5 states:

"Well conceived proposals for farm diversification schemes for business purposes which are consistent in their scale with their rural location will be permitted subject to their compliance with other plan policies and provided that no unacceptable harm is caused."

3.61 The latter part of the explanatory text at paragraph 9.27 explains how the District Council will consider the transport aspects of such schemes, it states:

"PPG13 indicates that farm diversification projects which have access by public transport, walking or cycling should be encouraged, but a realistic view of the availability of alternatives to the car should be taken. Schemes should also be supported where there would only be a moderate increase in daily traffic movements and the impact on minor roads would not be significant."

- 3.62 The application site is located approximately 2 km from a bus route. During weekdays service number 30/30A (Taunton-Axminster via Ilminster and Chard) provides an hourly service along this route. PPG13 paragraph 75 recognizes that walking offers the greatest potential to replace short trips particularly those under 2 km. and to provide part of a longer journey by public transport. Therefore although the application site is not located on a bus route it is accessible by public transport.
- 3.63 It should be noted though that public transport use in South Somerset is very low. The 2001 census showed that only 1.9% of journeys to work in South Somerset were by bus (ref Paragraph 7.26 of the Local Plan). Given such a low use of public transport across the whole of the South Somerset area we consider it unreasonable to object to the farm diversification project that is the subject of this planning application on this basis given that, by its very nature, it is located in a rural area.
- 3.64 We note also that the local transport plan includes proposals to improve public transport services in the rural areas in the vicinity of the application site.
- 3.65 We will demonstrate in the next section of this report that the potential traffic generation and traffic impact of the redevelopment proposals is very low and will have no noticeable detrimental impact on the operation of the local highway network.
- 3.66 We therefore conclude that the proposals comply with the above policy.
- 3.67 In addition to the above policy we consider the general development policies ST3 and ST5 relevant. Policy ST3 is the same as Joint Structure Plan policy STR6 and has therefore been considered previously. Policy ST5 sets out a range of criteria against which development proposals will be considered. Criteria 1 and 5 are relevant to consideration of the transport aspects of the proposals. These state:

"1 The proposal promotes of a (stet) pattern of land use and transport which reduces the need to travel, it minimises the length of journeys and provides accessibility by choice of means of transport

5 The proposal makes provision for a satisfactory means of access into and within the site and traffic resulting from development can be accommodated on the local transport network" "

- 3.68 It is clear that the redevelopment proposals will reduce the overall need to travel and minimise the length of journeys. The site is within easy cycling distance of Chard and Iminster and is accessible by public transport. We therefore conclude that the development meets the requirements of criterion 1.
- 3.69 The local highway engineer has accepted that a satisfactory means of access can be provided to the site (Ref Appendix 2 e-mail dated 7 September 2007 from the county council to the applicant). We will demonstrate in the next section of this report that the traffic generated by the proposed redevelopment can easily be accommodated on the local highway network. We therefore conclude that the development meets the requirements of criterion 2.
- 3.70 Our overall conclusion therefore is that the redevelopment proposals comply with the transport related policies of the local plan.

4.0 TRAFFIC IMPACT

- 4.1 The redevelopment proposals comprise an office development with a total gross floor area of 550 sqm.
- 4.2 The traffic generating characteristics of office developments are well-documented. Typically a trip rate of approximately 2 vehicle movements per 100sqm gross floor area in each of the peak hours is to be expected. The directional distribution is typically 90% in/10% out in the morning peak hour (8-9 a.m.) and 10% in/90% out in the evening peak hour (5-6 p.m.).
- 4.3 This equates to 11 vehicle movements each of the peak hours: 10 in/1 out in the AM Peak hour and 1 in/10 out in the PM peak hour.
- 4.4 The local highway network comprises a network of rural primarily single track roads with passing places. The Transport and Road Research Laboratory studied the capacity of single lane roads with passing places and reported its findings in Working Paper TSN29R. This research was, itself, based upon original research undertaken on single track roads in the Scottish Highlands.
- 4.5 It was concluded that single carriageway roads with passing places can cater for flows of 300 vehicles per hour (total two way) without incurring significant increases in delay compared with traffic in free-flow conditions.
- 4.6 Traffic flows on the local road network in the vicinity of the application site are very low. The impact of an additional 10 vehicle movements in the weekday peak hours distributed over the whole of the local highway network will be so small as to be insignificant, and indeed unnoticeable given the normal day-to-day and seasonal variations in traffic flow.

-
- 4.7 One of the buildings proposed to be converted to office use was previously used as a farm shop between 1981 and 2001. This use ceased in 2001 at the time of the foot and mouth outbreak when the risk of transmitting disease was considered too great. Up until that time the shop had operated seven days a week and employed two local people to assist the applicant and his family in the day-to-day running the shop. The shop attracted in excess of 100 customers per day.
- 4.8 Whilst acknowledging that the farm shop would have generated traffic the county council's highway engineer has expressed the view that such a use could be established elsewhere in the complex of farm buildings. This is not the applicant's intention and such a use would of course require planning permission in any event.
- 4.9 Irrespective of any past traffic generation associated with the three buildings forming the application site we consider that there is no justification whatsoever for objecting to the redevelopment proposals on the basis that the local highway network cannot accommodate the volume and type of traffic likely to be generated by the proposed office use. The fact that the site has in the past operated as a farm shop and generated significant traffic movements far in excess of those associated with the proposed new use simply strengthens this argument.
- 4.10 In its consultation response (Appendix 1) the County Council has also expressed concern that the proposed use would result in heavy goods vehicles accessing the site. This concern is based on the fact that the B1 use class encompasses light industrial uses as well as office development. The application is for office use (i.e. use class B1a) only and can be conditioned as such. The County Council's concern regarding heavy goods vehicles would therefore be overcome.

5.0 CONCLUSIONS

- 5.1 We have undertaken a thorough assessment of the traffic and transport issues and policy background associated with the proposal to convert redundant farm buildings at Manor Farm, Cricket Malherbie into office use.
- 5.2 Our investigations lead us to conclude that the farm diversification proposals fully comply with existing and emerging national, regional and local planning and transport policy. These policies seek to support rural areas and reduce the overall need to travel, and are perfectly summarised in Paragraph 5.45 of the Joint Structure Plan Review which states:
- "It is essential that employment opportunities are maintained and created in rural areas to help sustain rural communities and reduce the need to travel."*
- 5.3 We have considered the likely traffic generating characteristics of the small scale office development and the impact that this traffic will have on the local highway network. We have concluded that the proposals will only generate 11 vehicle movements in the weekday peak hours. Such low levels of traffic generation will have no significant detrimental impact whatsoever on the operation of the local highway network, indeed such small increases in traffic flow will be unnoticeable given the normal day-to-day and seasonal variations in traffic flow that will take place in any event. We have concluded that the proposed office use will generate no heavy goods vehicle traffic. We therefore conclude that the local highway network can safely accommodate development-generated traffic.
- 5.4 We are aware of the past use of part of the application site as a farm shop. On the basis of information provided to us, we have concluded that the shop would have generated in excess of 200 vehicle movements per day which is far more than the proposed office use. The fact that the past use of the site would have generated far more traffic than the proposed use has been noted, but does not form any part of our consideration leading to the conclusion that the local highway network can accommodate development-generated traffic.

-
- 5.5 Our overarching conclusion therefore is that there is no policy, or technical, justification for objecting to the redevelopment proposals on transport or traffic related grounds.
- 5.6 In our opinion the redevelopment proposals fully comply with national, regional and local policies regarding the rural economy and sustainability. This being the case we recommend that planning permission should be granted.

APPENDIX ONE

Letter dated 3 May 2007
From Somerset County Council
To South Somerset District Council
(highway consultation response)

Environment Directorate

Davidson-Grant Corporate Director
City Hall, Taunton, Somerset TA1 4DY

SOMERSET



County Council

South Somerset District Council
Customer Services (Planning)
Council Officers
Brympton Way
Yeovil
Somerset
BA20 2HT

please ask for
Ian McWilliams

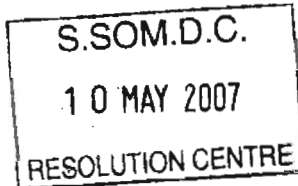
extension
01823 356006

IRMcWilliams@somerset.gov.uk

my reference
TD/PA/5/67/IRM

your reference
07/01185/COU

Fao: Elaine Orme



3 May 2007

Dear Madam:

**TOWN AND COUNTRY PLANNING ACT 1990
CHANGE OF USE AND CONVERSION OF BARNES TO OFFICE USE
MANOR FARM, CRICKET LANE, CRICKET MALHERBIE, ILMINSTER
PLANNING APPLICATION: 07/01185/COU**

I refer to the above-mentioned planning application received on 19th March 2007 on which I have the following observations on the highway aspects of this proposal: -

In principle, the proposed development site is remote from any urban area and therefore distant from adequate services and facilities. In addition, public transport services are infrequent. As a consequence, occupiers of the new development are likely to be dependant on private vehicles. Such fostering of growth in the need to travel would be contrary to government advice given in PPG13 and RPG10, and to the provisions of policies STR1 and STR6 of the Somerset and Exmoor National Park Joint Structure Plan Review (adopted policies: April 2000).

In detail, the approach roads to the site are substandard by reason of their restricted width and poor alignment and there are a limited number of passing places. The proposal is likely to generate a significant increase in the level of traffic using these roads and therefore the potential for conflict.

The proposal to convert the buildings into Class use B1 raises concerns regarding the volume and type of traffic that the proposal could potentially generate. The B1 class use includes uses such as light industrial and research studios, of which all could be established at the site without the need for planning permission once a B1 use has been permitted. As a result there is a significant concern that this development may result in the increase in the number of heavy goods vehicles accessing the site. Given the sites location and the substandard nature of



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the approach roads as already mentioned in this response it is felt that this is an inappropriate location for such a development.

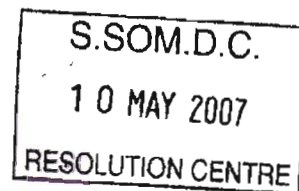
Therefore, I would recommend that this application be refused on highway grounds for the following reasons:

1. The proposed development would be located where it is remote from adequate services, employment, education, public transport, etc, and will therefore increase the need for journeys to be made by private vehicles which is non-sustainable and in conflict with advice given in PPG13, RPG10 and Policy STR1 and STR6 of the Somerset and Exmoor National Park Joint Structure Plan Review, April 2000.
2. The approach roads by reason of their restricted width and poor alignment are considered unsuitable to serve as a means of access for the type of traffic likely to be generated by the proposed development.

Yours faithfully,



Ian McWilliams
Planning Liaison Officer
Somerset County Council



APPENDIX TWO

E-mail dated 7 September 2007
From the local highway authority
To the project architect

designerjohn

From: "Ian McWilliams" <IRMcWilliams@somerset.gov.uk>
To: "designerjohn" <designerjohn@btconnect.com>
Sent: 07 September 2007 10:53
Subject: RE: Manor Farm, Cricket Malherbie

Dear John

Thank you for the additional information you sent regarding the traffic movements associated with the farm shop when it was in operation. As I am sure you are aware the Highway Authority in its initial response recommended that the application be refused on highway grounds on the substandard approach roads and the remoteness of the location.

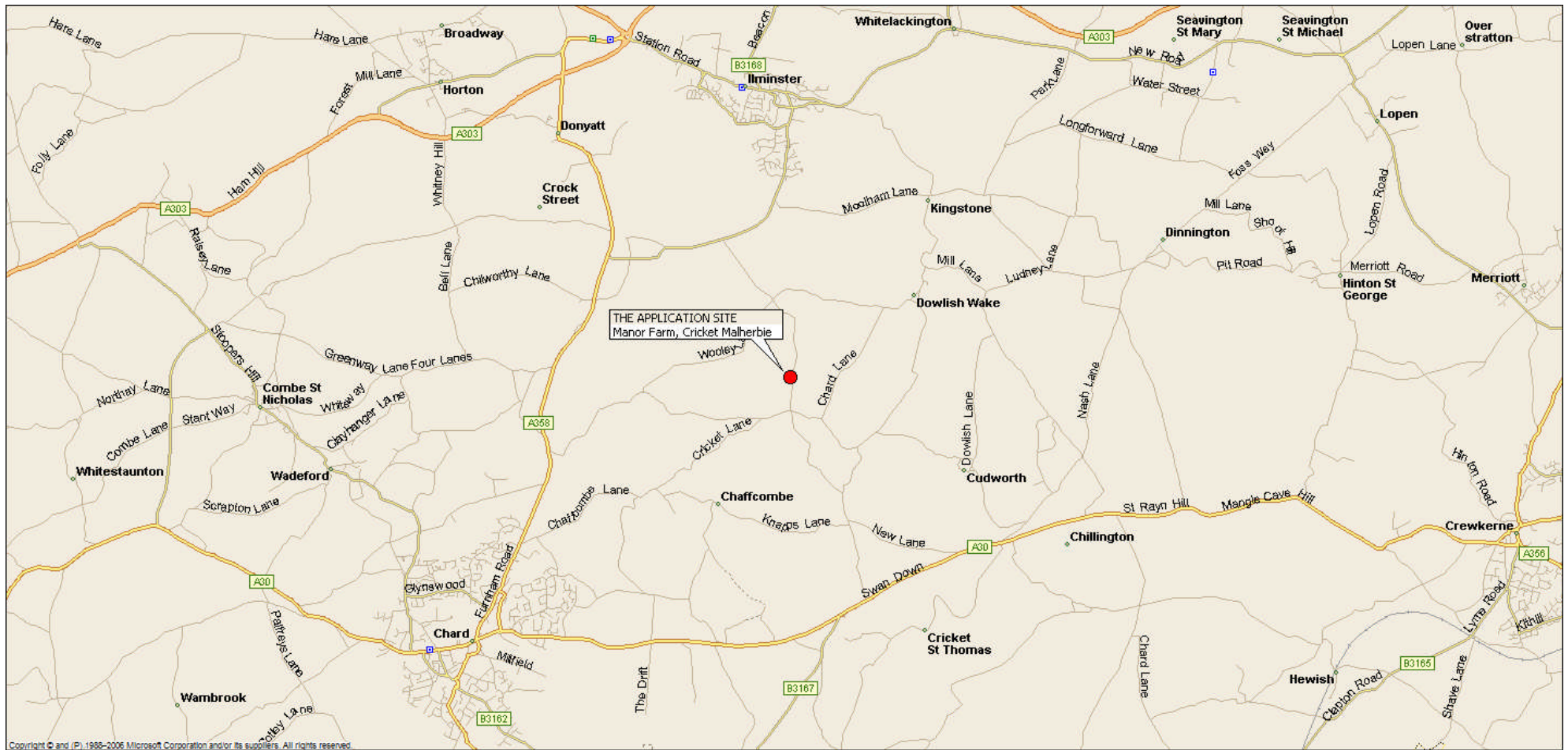
Whilst it is acknowledged that there were movements associated with the shop, there are still concerns that the proposal to change the use of the building to B1 office if permitted is likely to create in a material increase in the use made of the substandard approach roads given the fact that the proposal is to employ thirty members of staff who are likely to access the site by private vehicle and the associated delivery vehicles connected to the business.

As a result, whilst the Highway Authority are satisfied that a safe access from the site can be formed and adequate parking and turning facilities provided, the increase in the use of the approach roads means that the Highway Authority stands by its initial recommendation of refusal.

Regards

Ian McWilliams
Planning Liaison Officer
Somerset County County

FIGURE



Proposed Conversion of Redundant Barns to Offices at
 Manor Farm, Cricket Malherbie
 Ilminster, Somerset

SITE LOCATION
 (not to scale)

FIGURE 1