

Dear Sir or Madam,

Kelbrook and Sough Neighbourhood Plan: Reg 16 Consultation

Thank you for consulting the Council on the above planning document. I provide the following comments and hope they are of assistance.

Highways and transport

There are two allocated housing sites in Kelbrook, Dotcliffe Yard for 3 dwellings and Cob Lane for 10 dwellings.

Dotcliffe Yard has a planning permission (reference 17/0077/FUL) for 3 dwellings and there is an application for 3 dwellings pending under reference 22/0044 for the same site. The principle of development is accepted.

Cob Lane has a planning permission which was allowed at appeal (reference 16/0488/OUT & APP/E2340/W/18/3200240) for 9 dwellings. Subsequently a Reserved matters application was refused under application reference 17/0691/REM and a Permission in principle application was approved reference 21.0399. Again the principle of development is accepted.

The Highway Authority raised no objection to the proposals submitted subject to conditions.

Further sites are detailed within the Plan and here are our comments in relation to these sites.

P068 – 64 dwellings - Land at Barnoldswick Road/Colne Road, Kelbrook.

There are existing points of access to this site which are minor field gate accesses which are currently used for agricultural traffic and seasonal car boot sales are held. The access on Kelbrook Road B6383 is sited approx. 100m north west of the roundabout junction with Colne Road A56. Kelbrook Road carries a 50mph speed limit and would require visibility splays of 160m in both directions. Due to the close proximity of the roundabout a junction assessment and collection of speed data would be required to determine the suitability of the access to serve a residential

site. A right turn lane with traffic island is likely to be required which would require road widening into the highway verge. Enhancement to the pedestrian links to the nearest bus stops would be required including new sections of footway and crossing point.

The site access on Colne Road A56 30mph speed limit is sited approx. 110m north of the roundabout junction of Kelbrook Road between no 428 and 422 Colne Road. This access is considered suitable for pedestrians and cyclists only and not as a vehicle access to a residential site. The visibility splays are not achievable. Part of the land within the red edge is held by Lancashire County Council for a future road scheme.

P004 – 60 dwellings - Land to south of Quernmore Drive-access via Old Stone Trough Lane.

There is an existing access to this site on Old Stone Trough Lane which is unsuitable to accommodate the development traffic due to its narrow carriageway width and lack of footways. The wider network in Kelbrook experiences access issues due to the heavy on-street parking. This can't be mitigated within the extents of the highway.

A new access on the A56 is not supported due to the impact on the A56 which carries a high volume of local and cross boundary traffic. There is a change in speed limit from 30mph to national speed limit along the site frontage which will result in high vehicle speeds and require speed data to be collected to advise the visibility splays which may not be achievable. There is no footway on the south east side on Colne Road along the development frontage and the neighbouring frontage and insufficient highway verge to allow a footway to be provided without narrowing the carriageway, which we do not support. The nearest bus stops are located more than 400m from the centre of the site which does not support sustainable travel and is contrary to the National Planning Policy Guidance.

School Provision

Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire can access a mainstream school place in Lancashire. Some children have Special Educational Needs for which they may need to access school provision outside of Lancashire; Special Educational Needs provision is managed by LCC's Inclusion Team and is not covered by this response.

Our [School Place Provision Strategy 2022 – 2025](#) provides the context and policy for school place provision in Lancashire. Through the strategy, Lancashire County Council will need to address a range of issues around school organisation to ensure that is fit for purpose, sufficient and delivering the best outcomes for children and young people.

Demand for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the needs of a new development there is the potential to have an adverse impact on the infrastructure of

its local community, with children having to travel greater distances to access a school place.

The Department of Education has produced new guidance updated November 2019; 'Non-statutory guidance for local authorities planning for education to support housing growth and seeking associated developer contributions'. This guidance and its purpose enables the local authority with the education responsibility to evidence the need and demand of school places that new housing development will have on community infrastructure, including education.

The guidance promotes good practice on pupil yield evidence, engagement with local planning authorities and the delivery of expanded or new schools with funding from housing development.

Further information and details regarding the new guidance can be found by using the link <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

The evidence supplied through the planning process will identify the impact and set out the mechanisms for securing developer contributions required to mitigate that impact.

In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Councils Home to School Transport Policy. Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:

- Already over-subscribed,
- Projected to become over-subscribed within 5 years, or
- A development results in demand for a school site to be provided.

Primary Schools

Within the Kelbrook and Sough Neighbourhood Plan area there is only a single primary school which is part of the wider Barnoldswick Primary Planning Area. The latest position at the school as at the 8th March 2022 is below:

School	PAN	NOR	Capacity	Surplus / Shortfall
Kelbrook Primary School	15	98	105	+7

It needs to be noted that the primary school is a small designated rural school which is land locked on all sides with limited playing field land. Under the protection of school playing fields as prescribed within section 77 of the Education Standards and Framework of 1998, Kelbrook Primary School cannot lose any of its existing playing field land.

Therefore, in effect, there is no possibility to build additional buildings on the playing field, hence the size of Kelbrook Primary School is fixed and it cannot be expanded. Where additional housing is proposed as part of the Kelbrook and Sough neighbourhood plan it should be noted that the impact is unlikely to be mitigated within the neighbourhood plan area and pupils may be required to travel to access primary school places out of area.

Whilst there are no large strategic sites within the neighbourhood plan at this time, there are a number of smaller sites identified, some with unknown dwelling mix. This assumes that all dwellings will come forward by this time. In addition, there are likely to be smaller developments within the planning area which will contribute to the impact on mainstream school places. Dependent on the size of the developments and timing of application, it is likely that an education contribution will be sought, but the mitigation is likely to be outside of Kelbrook and Sough Neighbourhood plan area due to the site constraints of Kelbrook primary school.

If there was a future large strategic site for housing identified within the area, then it is likely that a new school would be required as part of that housing development to make it sustainable in terms of education provision. However, at this time the scale of housing proposed would not enable a new school site to be sought.

Secondary Schools

Secondary planning is based on the whole district not on individual planning areas, accepting that older children are able to travel independently and there is greater parental preference in terms of freedom to travel.

Within the wider Pendle district, there are 6 secondary schools including West Craven High School now an Academy, which is the closest school to Kelbrook and Sough.

Lancashire County Council is currently making significant investment within secondary schools in Pendle, building expansions at Colne Primet Academy with an additional 225 places and SS John Fisher and Thomas More RC High School with an additional 100 places, to deal with current and future demand for secondary places through to 2028.

Due to this investment, there is expected to be sufficient places in Pendle secondary schools for the foreseeable future, subject to the level of housing development over 5 years being delivered in line with Pendle BC's latest housing land supply. Further development beyond this will require secondary places to be considered as part of any future developments and School Planning Team will continue to work closely with Pendle BC planning officers to submit education impact assessments as part of future planning applications.

Education Contribution Assessments

When providing an education contribution assessment for a development, Lancashire County Council would look at the impact within 5 years, considered a reasonable timescale for a development to come forward. The secondary projections consider migration of primary pupils accessing secondary school places. The data available for 5 years means that these projections are more reliable than the longer-term projections and heavily caveated.

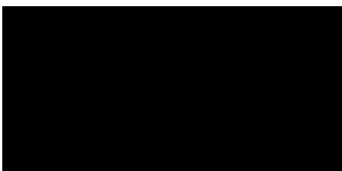
When considering the impact of housing the housing assessments take into account the number of bedrooms within a dwelling, as this affects the anticipated yield from a development. At the point of pre-application/outline application stage the dwelling bedroom information is not generally available, therefore, Lancashire County Council has made the assumption that all dwellings will have 4 bedrooms and the 4-bedroom pupil yield is applied. When a development produces accurate bedroom information the School Planning Team reserve the right to reassess the pupil yields.

The table below sets out the yield per development. An assessment would only be calculated for applications of 10 dwellings or more, however a number of smaller developments coming forward at the same time in smaller rural areas such as Kelbrook and Sough can have an impact on the education provision and other infrastructures. Lancashire County Council advise all planning authorities to take a strategic approach when reviewing applications and their impact. The School Planning Team can advise at the point of application submission.

No of Bedrooms	Yield per development - Primary	Yield per development – Secondary
1	0.01	0.00
2	0.07	0.03
3	0.16	0.09
4	0.38	0.15
5+	0.44	0.23

The School Planning Team will work closely with colleagues within Pendle BC Planning Department to monitor the progress of new housing across the district and the potential impact on the education provision. In conjunction with the latest stages of the districts emerging local plan adoption, the School Planning Team welcome the opportunity to respond and engage with Parish Councils throughout the neighbourhood plan providing up to date information that helps shape the future of parish communities ensuring the right infrastructure is in place to meet the growing demand.

Yours Faithfully,



Marcus Hudson
Head of Planning