

**Proposed development: Full Planning Application (Retrospective) for Change of use to a food store (Use Class E(a)), with associated access and parking areas and minor external alterations to the frontage (retrospective)**

**Site address:  
Units 3 and 6 Unity Trading Estate (Euro Grocers)  
Pearson Street  
Blackburn  
BB2 2ES**

**Applicant: Euro Garages**

**Ward: Blackburn Central Councillors: Samin Desai; Mahfooz Hussain  
Zamir Khan**



## **1.0 SUMMARY OF RECOMMENDATION**

1.1 **APPROVE** subject to the conditions detailed within section 4 of this report.

## **2.0 KEY ISSUES/SUMMARY OF PLANNING BALANCE**

2.1 This application is before the Planning and Highways Committee, in accordance with the Scheme of Delegation, as it relates to major commercial development.

2.2 The proposal will assist in widening the retail offer in the borough; in accordance with the Council's strategic aims and objectives for economic growth and expansion of public facilities and services, without prejudice to existing retail provision in the borough's Town and District Centres. The proposal is also satisfactory from a technical point of view, with all issues having been addressed through the application or capable of being controlled or mitigated through planning conditions.

## **3.0 RATIONALE**

### **3.1 Site and Surroundings**

3.1.1 The application site relates to an existing premises located to the south east of the A674, and in close proximity to the Whalley Banks District Centre, within the defined inner urban area.

3.1.2 The host building is a modern warehouse style structure using metal cladding for the upper part and red-facing brick and quoins to the lower part of the building. Access to the site is taken from Pearson Street and the site boundary is defined by metal fencing. There is a tarmacadam customer car parking area to the front of the building. There is a separate secure service yard to the rear of the building.

3.1.3 The immediate surrounding area is characterised by a mix of retail and commercial uses, which includes furniture stores, tyre repairs/fitters, a petrol filling station and independent and national chain retailers. The application site is circa 500m south from the Johnson Street District Centre, circa 500m north from the Bolton Road District Centre and circa 400m to the west of Blackburn Town Centre's Boundary.

### **3.2 Proposed Development**

3.2.1 The proposed development relates to the change of use of vacant units 3 and 6 located at Pearson Street (Unity Trading Estate), to form a retail use within Use Class E(a), namely the 'Euro Grocers'. The gross floor area of the unit is 1,128sqm with a proposed net sales area of 772sqm. When planning permission was granted in July 2003, for change of use from Class A1 (retail) to mixed use comprising A1 retail and B8 storage,

a condition was imposed No.2, which restricted the sale of goods to non-food, and no clothing sales, pharmaceutical/personal care products, toys, fancy goods and giftware (ref: 10/03/0426). The application site was previously occupied by “Plumb Centre”.

- 3.2.2 It is intended that the store will focus on the sale of food and fresh produce and groceries, packaged food Asian specialty food produces, but also includes a number of concessions including an in-store butcher, bakery and ambala (Asian sweets).
- 3.2.3 The proposal also includes alterations to the building façades; including new cladding and glazing to replace the existing brick and metal cladding. The existing doors are replaced by two glass automatic motion censured doors, with two small Euro Grocers logo above the doors (which will be subject of a separate application), signalling the entrance to the store for customers. The final element relates to the widening of the existing vehicular and pedestrian access from Pearson Street and resurfacing and marking out of the car park area.
- 3.2.4 The application is being made retrospectively, as the store opened on the 1st April 2022 without the benefit of planning permission.



Google street view image of application site – August 2022:



Extract from proposed floor plan of store:

### 3.3 Development Plan

3.3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

3.3.1 The Development Plan comprises the Core Strategy and adopted Local Plan Part 2 – Site Allocations and Development Management Policies. In determining the current proposal the following are considered to be the most relevant policies:

3.3.2 Blackburn with Darwen Core Strategy (2011):

- CS11: Facilities and Services
- CS12: Retail Development
- CS16: Form and Design of New Development

### 3.3.2 Blackburn with Darwen Local Plan Part 2 (2015):

- Policy 2: The Inner Urban Area
- Policy 7: Sustainable and Viable Development
- Policy 8: Development and People
- Policy 9: Development and the Environment
- Policy 10: Accessibility and Transport
- Policy 11: Design
- Policy 26: Town Centres – a Framework for Development
- Policy 27: District Centres – a Framework for Their Development
- Policy 29: Assessing Applications for Main Town Centre Uses

## 3.4 **Other Material Planning Considerations**

### 3.4.1 National Planning Policy Framework (The Framework) 2021:

The Framework sets out the government's aims and objectives against which planning policy and decision making should be considered. At its heart is a presumption in favour of sustainable development, which should proceed without delay, unless impacts which significantly and demonstrably outweigh the benefits of a proposal are identified. The following sections of the Framework are considered relevant to assessment of the proposal:

- Section 6: Building a strong, competitive economy
- Section 7: Ensuring the vitality of town centres
- Section 11: Making effective use of land
- Section 12: Achieving well-designed places

## 3.5 **Assessment**

3.5.1 The Development Plan reaffirms The Framework's principles of sustainability which includes support for sustainable economic development and encouragement of effective re-use of land; subject to the principles of high quality design and securing a good standard of amenity for all existing and future occupants of land and buildings.

3.5.2 In assessing this application the following matters are of particular relevance;

- Principle of development, with reference to retail strategy
- Accessibility and transportation issues
- Design and appearance considerations

3.5.3 Principle of Development: The site is located within the Borough's urban boundary, as defined within the adopted policies map. Local Plan policy 1 identifies this as the preferred location for new development. Furthermore, policy 1 also advises that development within the urban

area will be granted planning permission where it complies with other policies of the Development Plan.

- 3.5.4 Retail Assessment: Policy CS12 of the Blackburn Core Strategy defines the Borough's retail hierarchy, including Blackburn at the top of the hierarchy. It expects that the town centres will be the focus of all major and significant minor retail development, but does go on to identify that "*if towards the end of the Strategy period, sites to meet identified needs are not available within the Town Centres, development will be located according to the following sequential test: first: edge of centre sites*".
- 3.5.5 The Local Plan includes details of the district centres, including Whalley Banks (27/9), to which the application site is adjacent to. In terms of retail policies, Policy 27 identifies that "*within and adjacent to the district centres....development will be supported where it encourages mixed uses, and where it responds to the scale and function of the centre in question. Proposals which fulfil these requirements will be permitted in the following circumstances*":
- *New build proposals should be proportionate to the scale and function of the centre. New retail, leisure, office and service use developments should demonstrate that they cater for local needs, and should be accompanied by an impact assessment if they involve the creation of new floorspace above the thresholds set out in Policy 29. The assessment should consider the impact of the proposal on existing, committed and planned public and private investment in the centre and other nearby centres.*
  - *Proposals involving conversion and adaptation of premises or involving changes of use should take place within existing buildings and frontages in order to consolidate and strengthen the vitality of the centre. They should retain or provide shop fronts in order to maintain active frontages and retain the character and vitality of the centre.*
- 3.5.6 Policy 29, refers to indicative acceptable scale of proposals within centres, which identifies 500m<sup>2</sup> for district centres. The sequential approach to development also identifies a series of floorspace thresholds, above which impact needs to be considered. Within 500m of a district centre boundary the threshold is 250m and this expects that all centres within 500m need to be considered.
- 3.5.7 Policy 29 goes on to state that planning permission for retail development outside the Primary Shopping Area of Blackburn or the District Centres as identified on the Adopted Policies Map, or for other main town centre uses outside Blackburn town centres or the District Centres, will only be granted if the proposal complies with the remainder of this policy, and one or both of the following criteria are met:
- i. "The development is specifically supported by another policy in the Local Plan; or*

*ii. It is demonstrated that no sequentially preferable site is available or likely to be available within a reasonable timescale to accommodate the development; and that in discounting any sequentially preferable site, the developer / operator has applied a sufficiently flexible approach to their requirement in respect of scale, format and car parking provision.*

*Where an edge- or out-of-centre development is justified under this policy, preference will be given to locations which are well connected to an existing town centre; and appropriate measures will be required to maximise connectivity between the development and the centre.”*

### 3.5.8 Sequential Assessment:

The application is supplemented by a Retail Planning Statement (RPS), which includes a sequential assessment of alternative sites, in line with Policy 29's requirement.

### 3.5.9 Overview of sequential findings;

- Whalley Banks: – all sites too small to accommodate the development proposed
- Johnson Street: – all units too small to accommodate the development proposed
- Bolton Road: – only site, but this is too small to accommodate the development proposed
- Blackburn town centre:
  - Mall Unit 224 – understood to be available and of a similar floorspace. It is on the first floor of the enclosed shopping mall which has restricted opening hours and there are concerns raised around the location and availability of the car park. As such, it is accepted that this site is not considered suitable for the development proposed.
  - Former markets site – the site is considerably larger than what would be required for the development. Furthermore, the Council have aspirations of a comprehensive redevelopment of the site. As such, this site is not suitable or available for the development proposed.
  - Cathedral Quarter – although the potential scale of the sequential site is not identified, the Council have aspirations around an extension to the existing office development, potentially with the inclusion of ground floor retail/leisure floorspace. As such, this site is not available nor would it be suitable for the development proposed.

Overall, it is agreed that there are no suitable and available sites and therefore the proposal complies with the sequential approach to development.

### 3.5.10 Retail Impact:

The detailed impact assessment is covered within the submitted RPS, at section 6. Prior to this, it is noted that an assessment of the health of the key centres is contained at section 4. This provides a thorough assessment of the centres in question and also seeks to provide comparisons between the Council's assessments using the use class order at the time and the new use class order.

3.5.11 It is noted that the vacancy rate at Whalley Banks has increased significantly between 2019 and 2022 from 11% to 27%. The recorded increase can in part be attributed to the fact that four units located around Ri's Tyre Shop were originally occupied by a single trader (a tool hire company) which has since vacated the premises and the units are now marketed as four separate units rather than as a single unit. The RPS also recoded a larger number of units within the centre to that of the previous Council study, (52 units rather than 46). These factors will have contributed to the recorded increase in the vacancy rate and overall number of units available in the centre. By comparison, the Johnson Street centre has seen little movement within vacancy rates, whilst the Bolton Road centre has experienced a reduction in vacancy rates, 41% in 2019 to 20% in 2022

3.5.12 Moving onto the assessment of impact, the methodology is set out from paragraph 6.2 of the RPS and includes:

- Catchment – the site's catchment is broadly identified as a 5 minute drive time. However, for the purposes of undertaking the impact assessment, the RPS has identified Zones 4 and 12 of the Blackburn and Darwen Retail and Leisure Study Update 2021 as the most appropriate zones to enable direct comparability with the Council's Evidence Base. These zones include the District Centres within 500m of the application site. This approach is considered to be reasonable.
- No development scenario – which seeks to project the patterns of expenditure forward to 2027. The RPS sets out that changes to shopping patterns due to other commitments should be considered.
- Turnover and trade draw – it is noted that information from the 2021 BwD Retail Study is used. Although there have been more recent updates to population and expenditure information this is reasonably up to date and it is also noted that the PPG advocates using "drawing on existing information where possible";

3.5.13 Impact on centre viability and in-centre trade and turnover of trade;

Turnover is set out in detail in at Appendix 2 Table 4 of the RPS. As a new format of store, there is no published sales density of a Euro Grocers store. In the absence of this, it is considered the applicant's decision to adopt the generic sales density applied to convenience goods commitments in the 2021 Update Study of £6,000 per sq.m is

reasonable for the characteristics and product offer of the proposed store. The annual turnover of the proposed additional floorspace is assessed to be c.£4.1m in 2022. It is assessed that 85% of the proposed development's turnover would be drawn from the catchment which, given the nature of the foodstore, is considered to be robust. The catchment convenience goods turnover of the proposed development in 2027 is therefore assessed to be £4.2m, with an ancillary £0.2m for comparison goods.

- 3.5.14 The RPS covers the impact on the centres in the primary catchment area. It is noted that the store-list reflects the findings of the BwD Retail Study. The balance of trade draw is; Aldi – 20%, Inflow -15%, Lidl – 14%, Morrisons – 14% and Others – 30% (representing destinations outside zones 4 and 12). As such, the forecast is that the majority of trade will be drawn from other national operator supermarkets within the primary catchment area.
- 3.5.15 Trade Effects - The key changes identified within the RPS following the development of the proposal between 2022-27 is that there will be a diversion of trade and consequential decreases in turnover achieved at centres/stores within the catchment within the period to 2027. However, the submission indicates that the catchment is predominantly served by medium-large format foodstores which, broadly speaking, are trading strongly. These stores are anticipated to continue to reasonably, at around company average sales densities following the proposed foodstore.
- 3.5.16 When undertaking the health check assessment of the Whalley Banks centre, a further 9 convenience retail units were recorded within the RPS. None of these shops were specifically identified in the store list reflected in the Council latest Retail Study and therefore a direct quantitative impact analysis could not be undertaken. Each of the other convenience goods shops was found to be of a small-scale, with their absence from specific assessment in the Retail Study reflective of their small-scale, local offering. Any trade diversion from these in-centre stores would therefore be considered to be modest.
- 3.5.17 A number of specialist convenience goods retailers were recorded in the Whalley Banks centre. Convenience businesses included; 3no Polish supermarkets, 2no. small convenience stores, a vape shop, a sweet shop, a butchers and a newsagents. In each case, given their small-scale offering, and in the majority of cases their specialist nature, these businesses would not be anticipated to be significantly impacted by the proposed foodstore as they provide a materially different offer to that of a supermarket as proposed, where customers could undertake a main food shopping trip.
- 3.5.18 Small scale convenience shops recorded in the other centres assessed within the primary catchment area similarly wouldn't be expected to experience anything above a negligible impact as a result of the

proposed develop, by virtue of the physical distance from the application site and the nature of the localised, top-up, or specialist function they each offer

### 3.5.19 Retail Impact Conclusions:

In terms of the sequential approach to development the assessment focuses on Blackburn Town Centre and all district centres within 500m of the application site, as agreed with BwD Council, and it is confirmed that there are no suitable or available sites to accommodate the application proposals.

3.5.20 A proportionate retail impact assessment has been provided based on the primary catchment area identified for the proposed store, represented by Zones 4 and 12 as defined by the Council's most recent Retail and Leisure Study.

3.5.21 The impact assessment has provided an assessment of the development proposal in respect to existing, committed and planned investment within centres as well as upon town centre vitality and viability, in line with the requirements of the NPPF. The impact assessment has also been supported by comprehensive health check assessments of the surrounding defined centres

3.5.22 The overall retail impact of the proposal on the identified Centres is not considered to be 'significantly adverse'. Accordingly, the proposal is considered compliant with Development Plan Policies CS12 and 29. Consequently, the principle of the proposal is compliant with the Development Plan and The Framework.

3.5.23 Accessibility and Transportation: Policy 10 requires that road safety and the safe, efficient and convenient movement of all highway users is not prejudiced and that appropriate provision is made for off street servicing and parking in accordance with the Council's adopted standards.

3.5.24 The application has been supported by a Transport Assessment (TA) and subsequent addendum; supplementing detailed drawings that provide for a widened site access linking to Pearson Street, dedicated service bay area to the rear of the building and revised car parking area to the front of the building. The car park layout provides for 41 parking bays, cycle stand facilities and PTW parking as detailed within Fig 1, below.

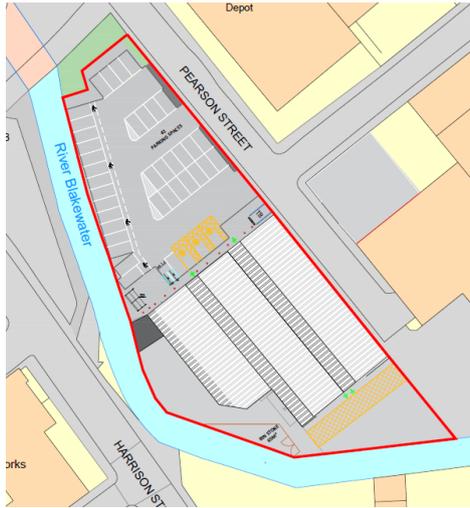


Fig 1: Amended proposed site layout



Google Street View image of application site – August 2022.

3.5.25 In relation to parking provision; the submission provides for 41 dedicated customer and staff parking spaces. This represents an under provision of 16 spaces when considering the Council’s adopted parking standard for food retail uses of 1 space per 16m<sup>2</sup>. The issue of under-provision is assessed through the TA addendum, which presents observed survey data confirming current levels of car park occupancy for both the car park and local on-street availability. The parking assessment data suggests that the proposed on-site parking provision of 41.no spaces would comfortably cater for the maximum levels of parking demand.

3.5.27 The TA identifies further justification in support of the proposed parking provision in relation to the site’s accessibility. A review has identified that the site is highly accessible by sustainable modes of travel given proximity to bus and rail, and opportunity for cycling and walking, which would work to encourage access by sustainable modes, for both staff and customers. A Travel Plan has also been submitted and reviewed. The plan is considered to appropriately address the fundamental principles of sustainable travel. Its delivery should be secured by condition. Similarly, a condition requiring the provision of covered cycle

stands within 3 months of the permission being granted will also be necessary.

- 3.5.28 A review of the highway accident data for the site access points and adjacent highway has been reviewed and identified no pre-existing patterns or trends of incidents that could be impacted by the redevelopment proposals. In addition, A capacity assessment of three local junctions been undertaken which includes traffic associated with the operational food store for the current year of opening and 2027 design year. The assessments demonstrate that all junctions currently and will continue to operate within capacity with the operational food store in the 2027 future year assessment scenario.
- 3.5.29 The submission indicates that the business would be serviced via a dedicated delivery bay area to the rear of the building. A swept-path assessment has been undertaken which demonstrates that the largest anticipated service vehicle can comfortably be accommodated within the site, with servicing and deliveries to reflect those previously associated with the site's extant use. It is noted, however, that access to the service bay area requires movement through third party land. The applicant has advised that a long-standing agreement is in place to secure access rights. Nonetheless, it appears reasonable to impose a condition requiring the development to be serviced exclusively from the rear of the building as the alternatives of deliveries being unloaded within the front public car park area or on-street would both lead to unacceptable highway safety conflicts.
- 3.5.30 Accordingly, on balance, compliance with Policy 10 is achieved, as the proposal is considered to be acceptable from a highway safety and efficiency perspective; subject to implementation of the aforementioned measures, to be secured by condition.
- 3.5.31 Design / Layout / Character and Appearance: Policy 11 requires a good standard of design and will be expected to enhance and reinforce the established character of the locality and demonstrate an understanding of the wider context towards making a positive contribution to the local area.
- 3.5.32 Prior to the works at the site the existing building facades were formed by buff brick to the lower section of the building, with the upper walling being clad. The proposals incorporate the introduction of large expanses of glazing to the lower section of the front façade, with the upper walling being re-clad in dark grey. The upper walling also includes illuminated signage that will be subject of a separate application. The side elevations have been clad to match the upper walling on the front façade.



Fig 2: Existing appearance of front facade



Fig 3: Proposed appearance of front facade

3.5.33 The proposals are considered to represent good design, enhancing the appearance of the building and providing for a modern design that contributes positively to the wider street scene. Accordingly, compliance with core strategy policy CS16 and Local Plan policy 11 is achieved.

3.5.34 Drainage: Policy 9, amongst other considerations, requires incorporation of appropriate drainage measures, in order to demonstrate that the development will not be at an unacceptable risk of flooding.

3.5.35 The application is supported by a Flood Risk Assessment (FRA), which identifies the site as being positioned, in part, within flood zone 3 due to the adjacent River Blakewater. The FRA concludes that the only significant potential sources of flooding to the development are fluvial flooding from the River Blakewater and surface water flooding.

3.5.36 Site-specific predicted flood water level data has been obtained from the environment Agency from the 2012 Darwen Deculverting Study. Whilst the model is currently being updated to reflect recent flood risk management scheme work, it represents the most up-to-date flood risk data for the application site.

3.5.37 The 2012 flood model includes a 20% allowance for climate change, current Environment Agency guidance confirms that a 36% climate change allowance is now considered appropriate. Therefore, in the absence of appropriate flood model data, it has been assumed that the future extent of Flood Zone 3, with allowance for long-term climate change, would be approximately equivalent to the present-day Flood Zone 2 extent. Therefore, the design flood water level for the development, equivalent to the 1% annual probability flood extent + climate change, has been based on the predicted flood water level data for the present-day 0.1% flood event, at 104.28mAOD.

3.5.38 The local risk of surface water flooding is high along Pearson Street adjacent to the application site, based on Environment Agency published

mapping. However, the local topography rises slightly into the application site, reducing the risk of surface water flooding within the building to low.

3.5.39 The proposed development represents a change of use only, with no built development other than minor alterations to the existing façade; therefore, the potential to incorporate flood risk mitigation measures is limited. However, the following measures are proposed within the FRA in response to the fluvial and surface water flood risk:

- The application site lies within the Environment Agency's flood warning area for the River Blakewater at Blackburn Wranglings, between Railway Road and Whalley Banks. Therefore, it is recommended that a Flood Warning and Evacuation Plan be prepared for the development.
- If feasible, within the current building design constraints, attempts should be made to exclude flood water of depth up to 0.3m through the introduction of removal barriers to door and other openings to this height. In addition, if feasible, flood resilient design should be introduced within the building, such as the use of appropriate floor coverings and raised storage areas.

3.5.40 The proposed development will not change the existing flood risk vulnerability classification of the land use. Therefore, this FRA concludes that the proposed change of use of Unit 1, Pearson Street, Blackburn to a food retail store, classified as 'less vulnerable' development, is appropriate and sustainable with regards to flood risk.

3.5.41 The Council's drainage team and the Environment Agency have reviewed the FRA and are satisfied that the development would be safe without exacerbating flood risk elsewhere if the proposed flood risk mitigation measures are implemented. It is therefore recommended that a condition requiring compliance with the submitted FRA be imposed upon any planning approval. Subject to the suggested condition, the proposal is considered to comply with the relevant requirements of Local Plan policy 9 and the NPPF

## **4.0 RECOMMENDATION**

### **4.1 Approve subject to conditions relating to the following matters;**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this planning permission.

REASON: Required to be imposed pursuant to Section 51 of the Planning and Compulsory Purchase Act 2004.

2. Unless explicitly required by condition within this consent, the development hereby permitted shall be carried out in complete accordance with the proposals as detailed on drawings:

Amended site plan\_EGSMUBS05.PLN3\_revision C, received 02/11/2022

Existing & proposed elevations\_EGSMUBS04.PLN4, received 12/05/2022

REASON: For the avoidance of doubt and to clarify which plans are relevant to the consent.

3. All deliveries and servicing for the development hereby approved shall be undertaken from the service yard to the rear of the premises, as detailed on the amended site plan drawing 'EGSMUBS05.PLN3\_revision C', received 2<sup>nd</sup> November 2022.

REASON: To ensure for the safe, efficient and convenient movement of all highway users, in accordance with the requirements of Policy 10 of the Blackburn with Darwen Borough Local Plan part 2

4. Within 2 months of the date of this permission, covered cycle stands in accordance with the details provide via email 2<sup>nd</sup> November 2022 shall be installed in the area identified on drawing EGSMUBS05.PLN3\_revision C, and available for use. The cycle stands shall thereafter be retained.

REASON: To provide for access to the site by sustainable modes of travel, in accordance with the requirements of Policy 10 of the Blackburn with Darwen Borough Local Plan part 2

5. The measures identified within the submitted travel plan (reference 3703722-TP: dated May 2022), received 12<sup>th</sup> May 2022, shall be implemented in full following implementation of the approved use. Thereafter the development hereby approved shall operate in full compliance with the approved document.

REASON: In the interests of promoting sustainable modes of travel and health and wellbeing; in accordance with Policies 10 and 33 of the adopted Blackburn with Darwen Borough Council Local Plan Part 2.

6. The development hereby approved shall be undertaken in strict accordance with the submitted Flood Risk Assessment (reference NS\_0124\_63, Issue V2.0, dated May 2022), received 17<sup>th</sup> May 2022.

REASON: To manage risk of flooding to the development and locality, in accordance with the requirements of Policy 9 of the Blackburn with Darwen Borough Local Plan part 2

## **5.0 PLANNING HISTORY**

- 5.1 10/03/0426 - Change of use from A1 to a mixed-use comprising non-food A1 and B8 storage (Approved July 2003)
- 10/97/0321 - Use of premises for the retail and trade sales of tiles and bathroom fittings (Approved July 1997)
- 10/92/1901 – Change of use from retail to leisure (D2) – indoor ‘quasar’ laser game (Approved March 1993)
- 10/91/1516 – Change of use to non-food class A1 (Approved December 1991)
- 10/90/0363 – Change of use to retail outlet, predominantly video rental and sales (Refused March 1990)
- 10/85/2061 – Retail sale of electrical goods (Approved January 1986)
- 10/80/2620 – Change of use of the existing building for the sale, storage and repair of fitted kitchens and products ancillary thereto
- 5.2 Additionally, there are a number of advert applications affecting the site, though they are not considered relevant to the determination of this current application.

## **6.0 CONSULTATIONS**

- 6.1 Public Consultation: 69 neighbouring properties have been individually consulted by letter. A press notice has also been issued and site notices displayed. No representations have been received.

- 6.2 Highways:

Parking: We have reviewed the adopted parking standards against the floorarea proposed. It is our opinion that the use for parking allowances is assessed against an A1 Retail (food) use, which would amount to 1 car space per 16sqm of floorarea. The total floorarea provided when measured against 922sqm would amount to an allowance of 57 car parking spaces.

The plans received accompanying the proposal indicates 41 car parking spaces in the parking area to the front of the store and 7 spaces in the rear car park (shared with the servicing areas). Whilst a lower number is encouraging, in favour of sustainable transport modes, we also need to

be conscious that parking does not spill onto the highway, due to the under provision.

Servicing: No details are presented on the number of service vehicles expected to the site. I expect these will be managed. A servicing area is proposed to the rear of the premises. The swept path provided requires the turning of vehicles to be undertaken outside the site curtilage. It is normal practice to have this contained within the curtilage, however we are prepared to accept on the proviso that this is managed with adjoining land owners. Please seek confirmation. What is however of concern is the staff parking as suggested within the same servicing area. We would recommend that these are removed in favour of supporting better access and egress for the service vehicles.

Access & Layout: The existing access from the highway is to be utilised. We would also ask that there is a separate pedestrian provided away from the vehicle entrance to avoid conflict and danger. All bays should be 2.4m x 4.8m with 6m manoeuvrability into and out of the bays. Please condition details of cycle and PTW security and coverage to be submitted for approval.

Transport Statement: The Transport Statement has been reviewed. We can confirm that the Addendum to the Transport Assessment which was submitted on 1st August addresses any outstanding issues around parking demand and traffic impact. The addendum presents observed survey data confirming current levels of car park occupancy for both the car park and local on-street availability. As such, I don't have any outstanding issues regarding the level of parking or traffic impact.

- 6.3 Drainage: No objection
- 6.4 Public Protection: No objection
- 6.5 Environmental Services: No objection
- 6.6 Environment Agency: We have no objection to the proposed change of use. The planning application is accompanied by a Flood Risk Assessment (FRA):

*Proposed Change of Use, Unit 1, Pearson Street, Blackburn, Flood Risk Assessment produced by Nicola Sugg and commissioned by EG Group, document reference NS\_0124\_63, Issue V2.0, dated May 2022.*

We have reviewed the FRA in so far as it relates to our remit and we are satisfied that the development would be safe without exacerbating flood risk elsewhere if the proposed flood risk mitigation measures are implemented. The proposed development must proceed in strict accordance with this FRA and the mitigation measures identified as it will form part of any subsequent planning approval. Any proposed changes

to the approved FRA and / or the mitigation measures identified will require the submission of a revised FRA.

**7.0 CONTACT OFFICER:** Martin Kenny, Principal Planner

**8.0 DATE PREPARED:** 4<sup>th</sup> November 2022