

Application Number:	PL/2026/04051
Location:	Ford Farm, Old Malthouse Lane, Ford, SP4 6DR
Proposal:	Prior approval Part 3 Class R for the change of use of an agricultural building to a flexible commercial use within Class E(c)(i), E(c)(ii) and E(c)(iii) - Financial Services, Professional Services and Other Appropriate Services.

[SP4 6DR - Google Maps](#)

[Old Malthouse Ln - Google Maps](#)

The following amended comments are made in response to the additional information submitted by the applicant's Agent.

The proposal seeks prior approval for the change of use of an existing agricultural building (460.59 sqm) to a flexible commercial use under Class E(c)(i), E(c)(ii) and E(c)(iii) - Financial Services, Professional Services and Other Appropriate Services.

As the floorspace exceeds 150 sqm, prior approval is required in respect of highways and transport impacts.

Assessment

The application seeks a determination as to whether prior approval is required under Schedule 2, Part 3, Class R of the GPDO, with assessment limited to:

- Transport and highways impacts
- Noise
- Contamination
- Flood risk

Given the proposal relates to 460.59 sqm of floorspace, it exceeds the 150 sqm threshold and therefore prior approval is required for highways matters.

This response addresses transport and highway impacts only, in line with HDM remit.

Existing Use and Fallback Position

The building is an established agricultural storage building which houses agricultural machinery, seed and fertiliser in connection with the farming enterprise at the site.

The additional information submitted advises the traffic generation associated with the existing agricultural use of the building varies from day to day, with the busiest time being during harvest where there could be 50 vehicle trips daily, while in the winter there may only be 1 trip.

There is, however, no detailed statement of the traffic generation associated with the existing agricultural use, or confirmation that all agriculture related traffic would be removed in the event that permission was to be granted for the change of use of this building.

Planning History

There is planning history on the wider site, with access served by the common access from Malthouse Lane, which would serve the application site.

S/2006/0399 Change of use from Agricultural Storage Building to Agricultural Storage, Storage of Trailer / Vehicles / Caravans – Refused 2 May 2006

13/02483/PNCOU Prior approval of proposed change of use of 500 sq metres of agricultural building to relocate applicants existing business 'Fieldfare Trailers' which specialises in sale and hire of new and used trailers and associated equipment, parts and accessories – Prior Approval not required

16/07514/FUL Retrospective Change of Use of farmyard area to outdoor storage of vehicles – Refused 2 May 2017

Access and Highway Network

Access is taken directly from Malthouse Lane (C287), which connects to the A30 to the east and the A338 to the west.

The access geometry and visibility at the junction with Malthouse Lane are considered acceptable and the site benefits from a large existing yard area capable of accommodating parking, turning and servicing activity.

Based on the submitted information, the existing access arrangement appears capable of accommodating traffic associated with the site. However, the route beyond the initial access point comprises a split driveway arrangement serving both neighbouring residential and commercial uses, with the access route to the application building appearing generally restricted in width.

The applicant has not provided sufficient information to demonstrate how this internal route would safely accommodate the level and type of traffic associated with the proposed flexible commercial use, including staff, visitors, servicing and delivery vehicles.

Proposed Use and Traffic Impacts

The proposal seeks flexible commercial use under Class E(c)(i), E(c)(ii) and E(c)(iii) comprising Financial Services, Professional Services and Other Appropriate Services.

The additional information submitted provides some detail regarding the anticipated trip generation associated with the currently intended use of the building and advises an estimated daily trip rate of 10.98 vehicle movements. It is also advised that the development would principally attract cars, light vans and occasional larger delivery vehicles.

However, the application seeks a generic Class E(c) permission rather than a permission tied to a specific occupier or operation. The level and pattern of traffic associated with an unrestricted Class E(c) use could vary considerably depending upon the eventual occupier, staffing levels, customer demand, delivery requirements and operational arrangements.

Whilst it is understood that the building is currently intended to be occupied by an existing business operating from the wider site, this does not form part of the application proposal and cannot be relied upon when assessing the development.

Furthermore, whilst some information has been provided regarding current agricultural traffic activity, no robust assessment has been submitted demonstrating the traffic generation associated with the existing lawful use of the building, nor whether agricultural activities currently associated with the building would cease in the event that prior approval were granted. As such, it has not been demonstrated whether the proposal would result in an overall increase, decrease or redistribution of vehicle movements associated with the site.

The submission also does not include a Transport Statement assessing the potential transport impacts arising from the broad range of uses capable of operating under Class E(c), including consideration of staff trips, visitor movements, servicing activity, vehicle types and the likely impact on the surrounding highway network.

Whilst it is acknowledged that the existing access onto Malthouse Lane is generally acceptable, concerns remain regarding the suitability of the internal access route and the relationship with the wider highway network. Previous planning applications in the locality have identified concerns associated with traffic movements at the junction of Old Malthouse Lane and the A30. Whilst this matter would not necessarily preclude development, insufficient information has been submitted to enable a robust assessment of the likely impact of an unrestricted Class E(c) use on this part of the highway network.

In the absence of a Transport Statement and sufficient supporting evidence, the Local Planning Authority is unable to adequately assess the transport and highway impacts arising from the proposed development.

Parking and Servicing

The site benefits from an existing yard area which appears capable of accommodating parking, turning and servicing activity. However, no detailed layout has been submitted demonstrating the level of parking, manoeuvring and servicing provision that would be available to support the unrestricted Class E(c) use proposed.

Given the absence of information regarding the likely scale and nature of occupation, staff numbers, visitor demand and servicing requirements, the Local Planning Authority is unable to conclude that suitable parking, turning and servicing arrangements can be provided to support the development.

Summary and Conclusion

The application seeks prior approval for the change of use of an agricultural building to a flexible commercial use under Class E(c)(i), E(c)(ii) and E(c)(iii). The proposal exceeds the 150sqm threshold requiring consideration of transport and highway impacts.

The additional information submitted has provided some clarification regarding the currently intended use of the building and a broad indication of potential traffic generation. However, the application seeks a generic Class E(c) permission rather than a use tied to a specific occupier or operation. Accordingly, the proposal could give rise to a range of different traffic generation characteristics, staffing levels, visitor demands, servicing requirements and operational arrangements.

Whilst the point of access onto Malthouse Lane is considered acceptable and the site benefits from an existing yard area capable of accommodating parking, turning and servicing activity, insufficient information has been submitted to enable a full assessment of the transport and highway impacts associated with the unrestricted Class E(c) use proposed.

In particular, the application does not adequately demonstrate:

- The existing traffic generation associated with the lawful use of the building;
- Whether agricultural traffic associated with the building would cease following implementation of the development;
- The likely traffic generation arising from the full range of uses capable of operating under Class E(c);
- The likely servicing requirements and vehicle types associated with the unrestricted use proposed;
- The suitability of the internal access route to accommodate the likely level and type of traffic associated with the development;
- That adequate parking, manoeuvring and servicing arrangements can be provided to support the unrestricted Class E(c) use.

The Highway Authority has consistently advised that a Transport Statement should be submitted to assess the likely transport impacts arising from the unrestricted Class E(c) use proposed and to enable a robust comparison with the existing lawful use of the building. No such assessment has been provided.

In the absence of this information, the Local Planning Authority cannot be satisfied that the proposed development would not result in unacceptable transport and highway impacts.

Recommendation

The Highway Authority recommends that prior approval be refused under Class R(b)(i) of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the following reason:

The applicant has failed to provide sufficient information to demonstrate the transport and highway impacts arising from the proposed change of use of the agricultural building to an unrestricted Class E(c) use. Insufficient information has been submitted regarding existing and future traffic generation, residual agricultural traffic movements, servicing requirements, vehicle types, parking and manoeuvring arrangements, and the suitability of the internal access route and wider highway network to accommodate the development. In the absence of this information, the Local Planning Authority cannot be satisfied that the proposed development would not result in unacceptable transport and highway impacts.

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Highways Development Management Engineer