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4th May 2017

FAO Mr Adam Birkett
Ribble Valley Borough Council
Development Management
Council Offices, Church Walk
CLITHEROE
BB7 2RA

Applicant: BKW Developments Ltd

Planning Application Number: 3/2017/0317

Proposal: Outline planning application for employment floorspace (use classes B1, B2 and B8) and associated access, car parking, landscaping and services infrastructure with all matters reserved except for access.

Location: land south of Blackburn Road, Hothersall, PR3 2YY

Dear Mr Birkett,

I am writing on behalf of Hothersall Parish Council to object to the above application.

The reasons for our objection are set out below. We have discussed this application with the parishioners at two open meetings [held on 14/03/2017 and 26/04/2017] and have made the application details available to parishioners and interested parties during the consultation period. (please see Appendix 1 - INDUSTRIAL WAREHOUSE/DEVELOPMENT - PUBLIC RESPONSE)

Local Plan Housing and Economic Development DPD

You may be aware that we wrote to the Forward Planning team at the Council [letter dated 31/03/2017] and I refer you to that letter and the reply from Mr Colin Hirst dated 26/04/17. The Parish Council stands by the views expressed in that letter and we are pleased to note that the site subject to this application [Land south of Blackburn Road] has NOT been identified in the Regulation 19 Publication version of the Housing and Economic Development – Development Plan Document April 2017.

In our view the decision taken by the Council on 6th April not to allocate this land for employment use is appropriate and demonstrates that the site is unnecessary to deliver the economic objectives set out in the Local Plan.

The Application

The Parish Council has reviewed the application documents provided to it and posted on the website and has sought relevant professional advice. This advice has led us to identify a series of concerns relating to the proposals which we feel are valid planning matters and should weigh heavily against the proposal in the planning balance.

These issues are addressed in detail below but in summary include:

- the siting, scale and form of the proposal is inappropriate to this open countryside location on the fringe of the Forest of Bowland Area of Outstanding Natural Beauty;
- the uses proposed include those [B2 & B8] which are inappropriate to this location due to the impacts that the buildings needed and the activity hosted will have on the local environment and on residential amenity;
- the siting of the buildings [as proposed in the Illustrative Site Location Plan] is inappropriate in respect of the proximity to Hillside School and will cause unacceptable harm to the setting of this special school.
- The proposal will have a harmful impact on the designated Biological Heritage sites at Hillside School Woodland and Spade Mill Reservoir.
- No provision appears to be made to identify any protected species on site, to assess the risk of harm arising to protected species and to put forward mitigation.
- No assessment has been made of the potential for adverse visual or landscape impact.
- The Transport Study appears to be inadequate; no consideration appears to have been given to Light or Heavy Goods Vehicles despite the proposed use class of the majority of the development [B2 & B8]

Siting, scale and form of development proposed

It is the view of the Parish Council that the siting, scale and form of the application proposals are inappropriate and conflict with policies in the adopted Core Strategy 2014.

Policy EC1 of the Adopted Core Strategy states that employment development will be directed towards the main settlements of Clitheroe, Whalley and Longridge as the preferred locations to accommodate employment growth.

The proposed site is not within the main settlement of Longridge as defined by the Proposals Map within the Districtwide Local Plan nor is it proposed for allocation or inclusion in the main settlement in the Housing and Economic Development DPR Regulation 19 draft published April 2017.

The applicant argues that it is in very close proximity to the new settlement boundary resulting from the Taylor Wimpey housing development at Tootle Green but we would point out that there

is no contiguous boundary between the proposed application site to the south of Blackburn Road and the Tootle Green site. We also feel that it is important to recognise that the eastern extension to Longridge created by the Taylor Wimpey development did not form part of the Council's strategic plan or spatial strategy, but rather was the result of an appeal which the Council was unable to successfully defend due to the [then] lack of a five year housing land supply.

Policy DMG2.1 states that development proposals in the principal settlements should consolidate, expand or round-off development so that it is closely related to the main built up areas. The application does not do this; the site is within open countryside.

Policy DMG2.6 states that within the open countryside development will be required to be in keeping with the character of the landscape and acknowledge special qualities of the area by virtue of its size, design, use of materials, landscaping and siting.

Furthermore, Policy EC1 states that in considering the development of land for economic development and in determining where this land will be located, priority will be given to the use of appropriate Brownfield sites. The application site is undeveloped greenfield land in agricultural use.

Policy DMG1 relating to design requires that proposals should be sympathetic to existing and proposed land uses in terms of size, intensity and nature as well as scale, massing, style, features and building materials [DMG2.2]. The policy also states that particular emphasis will be placed on visual appearance and relationship to surroundings, including impact on landscape character as well as the effects of development on existing amenities.

We recognise that the proposal is in outline with all matters save access reserved and that consequently matters relating to style, features and materials are relevant to a reserved matters application in the event that outline consent is awarded.

Nonetheless it is clear from the site layout and other details provided that the proposals seek to introduce a large area, over 10,000 square metres of industrial buildings in this open countryside location which is sited in close proximity to the boundary of the AONB. In our view the proposal is in no way 'sympathetic to existing and proposed land uses in terms of size, intensity and nature as well as scale, massing, style' and consequently is in direct conflict with DMG2.2.

The proposals provide no information on the likely eaves or ridge height of the buildings proposed but it is clear from use envisaged [which includes B2 & B8 as well as B1] and from the proposed site layout plan that the development will comprise a number of buildings of scale that will collectively form a significant mass of built environment in this currently open and pastoral setting. It is our view that these buildings [and related infrastructure] will be an alien feature in the landscape that will have an urbanising and harmful impact on local landscape character.

Landscape character

Policy EN2 states that the landscape and character of those areas that contribute to the setting and character of the Forest of Bowland AONB will be protected and conserved and wherever possible enhanced. The policy also states that as a principle, the Council will expect development to be in keeping with the character of the landscape, reflecting local distinctiveness, vernacular style, scale, features and building materials.

The applicant has made no effort to assess or address the inevitable landscape and visual impact of their proposals, this despite the fact that the south western boundary of the Forest of Bowland

AONB is in close proximity to the site [at Written Stone Lane]. The application includes no assessment of the likely visual or landscape impact of the proposals from the public highway, from other sensitive receptors such as neighbouring residential property of Hillside School or from public rights of way including the footpath that runs along the western boundary of the site, along the drive to Higher College Farm or the footpath that runs along Written Stone Lane to the north on elevated ground above Spades Mill Reservoir, part of which is within the Forest of Bowland AONB.

Consequently, it is our view that the proposal as set out in the planning application directly conflicts with Policy DMG1, DMG2, EC1 and EN2 of the Adopted Core Strategy and that material harms will arise from this conflict.

Use and type of the development proposed

It is our view that the use and type of the development proposed is inappropriate to the location and that development of this type is unnecessary in any event.

The Adopted Core Strategy identifies a need for up to 4 hectares of additional employment land. The Regulation 19 draft of the Housing and Economic Development DPD identifies a residual requirement for 2.41 hectares of employment land across the Borough. The draft DPD includes three allocated employment sites to meet that need, including one at Higher College Farm Longridge, but which do not include the application site. This is despite that fact that the application site was submitted to the Council for consideration as an employment site for Longridge.

The decision around allocating sites for employment land is current, made on April 6th 2017. The proposal is not for an extension or relocation of an established business. The application includes no evidence to demonstrate need or demand.

It is the Parish Council's position that there is no identified or evidenced need for additional employment provision as proposed by the applicant and that consequently the benefit arising from any such provision should be given limited weight in the planning balance.

In addition to the lack of need the use as proposed is inappropriate. This location is in our view entirely unsuitable to host over 7000 square metres of B2 and B8 use.

DMG3.1 Transport and Mobility in the adopted Core Strategy states that in considering development proposals the Council will attach considerable weight to the relationship of the site to the primary route network and the strategic road network.

The site is poorly related to the primary route network and strategic road network. It is served by a minor road; the B2643 / B6245 include two key pinch points, one to the west and one to the east of the site. These two 'pinch points' separate the site from the primary road network and which act as a major constraint to heavy goods vehicles. To the east of the site these include the 90-degree bend at the Black Bull in Ribchester; to the west traffic must either pass through the centre of Longridge [to the top of Berry Lane past the Dog Inn] or use Lower Lane and pass via the narrow area of Chapel Hill and the drop off and pick up area for St Cecilia's High School.

The Transport Study appears to be silent on the scale of light and heavy goods vehicles that the site would generate and makes no more than a cursory assessment of the potential impacts that the addition of this type of traffic would have on the capacity and safety of the local road

network. In our view the Transport Study fails to demonstrate that the proposal would fully comply with national and local transport and highways policy.

It is our view that the proposal conflicts with policy DMB3.1 and that material harm will arise from this conflict which should carry material weight in the planning balance.

Ecology and nature conservation

Policy DMG1 Environment states that the Council will consider the environmental implications of proposals and the potential for harm to sites of nature conservation. The policy goes on to refer to the principles of mitigation hierarchy; enhance, avoid impact, minimise impact, restore damage, offset damage.

Policy EN4 states that development proposals that adversely affect a site of recognised environmental or ecological importance will only be permitted where a developer can demonstrate that the negative effects of a proposed development can be mitigated, or as a last resort, compensated for.

The proposal has the potential to adversely affect the Local Biological Heritage site at Spade Mill Reservoir.

Policy DME3 Site and Species protection and conservation states that proposals likely to adversely affect priority species will not be granted planning permission; exceptions will only be made where it can be clearly demonstrated that the benefits outweigh the local and wider impacts.

It is our view that the proposal is very likely to adversely affect priority species and that insufficient care has been taken to identify the potential for harm and to apply the mitigation hierarchy. In our view the Ecological Appraisal submitted is inadequate to meet the requirements of these policies.

We say this because whilst the study fairly recognises the very significant incidence of reports of Lancashire Key Species [including 65 records of Great Crested Newt and 25 records of Bats] within the 2km buffer of the site it relies on a single site survey undertaken in October 2016 [outside or at best very late in the survey season], to come to the finding that there is no conclusive evidence of any specifically protected species regularly occurring on the site or the surrounding area which would be negatively affected by site development following the mitigation proposed [paragraph 8.1.2.]

It is our view that, due to high incidence of reports of protected priority species in the local area and the limited ability that the ecologists have had to fully investigate the site during a period when the identified protected species are active, this conclusion is unreliable and insufficient to meet the requirements set out in relevant policies of the Adopted Core Strategy.

Consequently, it is our view that the proposal will be likely to result in unacceptable harm to protected and priority species and that such harm should carry significant weight in the planning balance.

Proximity to Hillside School

Policy DMG1.1 [Amenity] states that proposals should not adversely affect the amenities of the surrounding area.

The Parish Council is very concerned that the proposals as put forward will seriously affect the amenity and learning environment of the children attending Hillside Special School.

The proposal appears to disregard the potential harmful impact on the amenity of the school, focusing instead on suggestions relating to parking and pick up which, so far as we are aware, have not been discussed with the school.

It is our view that the proposal conflicts with Policy DMG1 in respect of the impact on the amenity of the surrounding area and that this conflict should carry material weight in the planning balance.

Conclusion

Taking all the above issues into account it is clear to the Parish Council that the proposal will generate significant harms of various types. The proposal is clearly in conflict with the Adopted Core Strategy and, despite having had the opportunity to be so, is not supported in the Council's Regulation 19 draft Housing and Economic Development DPD.

Please note, we have commissioned a transport survey by VTC Highway & Transport Consultancy which will follow shortly. This survey may arrive just beyond the response deadline, therefore please can we request an extension in order to include it in our representation.

We are aware that in 2006 plans were refused at this site ref 3/2006/0329.

Consequently, it seems clear that the application should be refused and we look forward to sight of your report in due course. In the meantime, please do not hesitate to contact the Parish Council if you would like to discuss any of the matters raised in this letter.

Yours sincerely

Cathy Thompson (Mrs)

Clerk to Hothersall Parish Council

Enc: Appendix 1 - INDUSTRIAL/WAREHOUSE DEVELOPMENT - PUBLIC RESPONSE