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22nd July 2017

FAO Mr Adam Birkett - Principal Planning Officer

Ribble Valley Borough Council
Development Management
Council Offices
CLITHEROE

Applicant: M Hurst Esq

Planning Application Number: 3/2017/0602

Proposal: Outline planning application for employment floorspace use Class B1, Class B2 and Class B8 and associated vehicle and pedestrian access, car parking, landscaping and service infrastructure with all matters reserved except access and change of use of farmhouse from residential to Class B1

Location: Higher College Farm, Blackburn Road, Hothersall, PR3 2YY

Dear Mr Birkett,

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

You will be aware that Hothersall Parish is the subject of much planning activity recently; we are doing our best to be active participants in the planning process but would welcome some support from RVBC officers to ensure that we hit the right deadlines, and particularly ask that our views are considered as the 'host' parish council. Please note that this site is not in Longridge Town Council area and whilst they undoubtedly have an interest, they are not the 'local' community or parish in this matter.

Hothersall Parish Council has a number of concerns relating to this application which are set out in detail below.

One of two; consider in the context of BKW application

You will be aware that this is the second application in the parish for employment use; the first, that submitted by BKW Developments for up to 8,500 sq m of employment space [B1, B2 and B8]¹ is pending a decision.

¹ Reference 3/2017/0317

You will I hope be aware of this application but if not I ask that you consider the Hurst application against the context of the BKW application whilst it is still either pending decision, or in the event that it is approved. Our advice is that until refused, the BKW application is a material consideration of some importance to the determination of this application.

Housing and Economic Development DPD

We are aware that this site subject to this application is included in the draft HEDDPD as an allocation for employment use. Our advice is that whilst this is a consideration, the draft HEDDPD has not yet been subject Examination in Public and remains subject to objections. Consequently, it does not form part of the Development Plan and should be afforded very limited weight in the planning balancing exercise.

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.

Whilst identified as a draft employment allocation the proposed site is not within the main settlement of Longridge as defined by the Proposals Map within the adopted Districtwide Local Plan.

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 and the urban area of Longridge to the west [to the south of Blackburn Road].

We also feel that it is important to recognise that the eastern extension to Longridge created by the Taylor Wimpey development a) does not extend south of the Blackburn Road and b) did not form part of the Council's strategic plan or spatial strategy. It was the result of an appeal which the Council was unable to successfully defend 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.

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.

Sadly, the application provides very little information to help assess its conformity with Policy DMG1, DMG2, EC1 and EN2 of the Adopted Core Strategy. As an outline application, it does not have to, but we are concerned that once consent is granted it will be difficult to ensure that this policy is respected.

Consequently it is our view that, without prejudice to our overarching objection, in the event that consent is granted subject to a pre-commencement condition requiring the agreement of a Design Code and Landscaping and Maintenance Plan. The Parish Council would like to be a party to agreement of this condition, and of the Design Code and Landscaping and Maintenance Plan.

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.

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.

Transport and Highways

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.

Transport Statement

We have significant concerns relating to the Transport Statement. The first being that it has not been produced by an appropriately qualified person. Whilst we have respect for the professionalism of Sunderland Peacock as architects they are not Transport Planners or Highway Engineers.

It is confused; it talks first about exclusively B1 use [introduction] and then about B1, B2 and B8 uses.

It is therefore unsurprising that the Transport Statement is short on evidence and long on opinion.

We are particularly concerned about the work on traffic generation as it appears to have no evidential basis and in our view is not reliable. This lack of evidence is of particular concern when the report is produced by laymen rather than transport and highway professionals and, in respect of the access, the matter that it deals with is not reserved.

We note that the Statement proposes a pedestrian refuge, but appears to take no account of the fact that one is also proposed by the BKW development. In fact it fails to mention the BKW development, the new access that it proposes, and the traffic it will generate at all.

It is our view that the Transport Statement should be treated with considerable caution and should not be used as evidence on the ability of the application to meet local and national standards in respect of transport and highways policies.

Regardless of the conclusions of the applicant's Transport Statement, 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.

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 in a number of areas and whilst the HEDDPD remains in draft and subject to examination it cannot be considered to be sustainable in a decision taken under a plan led system. Section 38(6) requires the decision taker to give priority to the development plan and to assess the sustainability of the site against the policy framework set by the development plan. The recent Appeal Court judgement [East Staffordshire vs Barwood Strategic Land] should leave the decision taker in no doubt as to their responsibility in this manner.

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

cc by email: Cllr David Smith

Cllr Jim Rogerson