

Mr & Mrs P Morey
Stubbins Farm
Hothersall Lane
Hothersall
Longridge
PR3 2XB

22 January 2021

Planning Department
Council Offices
Church Walk
Clitheroe
BB7 2RA

Dear Mr Macholc

REF: 3/2020/1063 RIBBLE VIEW FARM, ALSTON LANE, PR3 3BN

Further to our email correspondence, we wish the following comments to be taken into consideration when determining the above application for change of use for Doggy Day Care Centre services.

NOISE NUISANCE

The noise report prepared by Martec, in 2.0 Site Design, sets out that the nearest “off site” property will control the overall impact of the development. We highly dispute this assumption that is dismissive of the impact of noise and that as a minimum Significant Observed Adverse Effect Levels should be anticipated with the likelihood being Noticeable and Disruptive Levels affecting other nearby properties.

The noise report goes to great length to point out all the areas and standards that should not be applied to this application whilst highlighting the need for flexibility to interpret national planning policy and putting emphasis on the 1999 guidance produced by South Holland DC. The report acknowledges that background measurements were taken during a lockdown period and may be lower than normal. Despite there being no standards or equivalent case studies/evidence, the authors are prepared to support their commissioners and conclude that levels of barking noise should be acceptable. In contrast to a one-day survey, with wind levels higher than ideal (reference 5.2 page 13) we can draw on 17 years’ experience of living in this location in close proximity to the proposed site.

The Martec report studiously omits to make any reference to the topography of the area and the effect on the distance that disruptive noise travels. The surrounding area is Open Countryside with hedges and wooded corridors and the character distinctly rural. Located in the Ribble Valley District not only is the proposed site surrounded by Open Countryside but it is sited on the actual edge of the River Ribble valley itself – the clue is in the name, Ribble View Farm. The valley accentuates noise which can echo along its length. As things stand, we can clearly hear the sound of dogs barking coming from the direction of Ribble View Farm and on occasion the more disturbing sound of dogs howling. These noises are intermittent and acceptable inasmuch that they usually take place for a limited period and therefore do not cause us undue stress or distress.

Furthermore, on a still day the rumble of the M6, 5km away, can be heard, motorcycles travelling along the A59 at Samlesbury, 3km away and even sounds such as tractors reversing can be heard from the farm on the opposite side of the River Ribble, 1km away. These noises are, as in the case of the M6, low level or as in the case of agricultural machinery, intermittent and in keeping with a rural location. Even the Martec report acknowledges that barking dogs are not regarded in the same respect as these examples of “anonymous noise” and that barking dogs are likely to trigger complex emotional reactions unlike natural/background noise.

The fact is noise travels, and as we are aware from the current dog ownership on site, the sound of barking dogs in doggy day care will certainly travel the 300m between the development and our property. What is more, the noise

of barking dogs is highly likely to be more constant in nature over a 12-hour period, potentially 7 days a week. This will certainly cause a nuisance and interfere with the use and enjoyment of our land as well as diminishing the acoustic character of the area along a stretch of the County's showpiece walk the Ribble Way footpath. We spend a large proportion of our time in the gardens/land surrounding our property. If the Covid 19 crisis and lockdowns has demonstrated more than ever it is that peoples' mental health benefits from enjoyment of outdoor space and tranquillity of the countryside. This is something we value and do not want to lose.

Furthermore, all the focus of the application has been on the dogs being exercised solely in the arena and conveniently overlooks the inclusion of an external dog run to be wrapped around the north and east sides of the arena building. This run is a new built feature that has no construction/sound proofing detail and was ignored within the Martec report. The external run has also been overlooked/omitted from the Design Statement which states under Site and Location on page 1 that "No changes to the external face of the building will take place".

Furthermore, the common doggy day care model involves exercising dogs in open paddocks. No mention of this practice is included in any of the supporting statements/reports. We are concerned that this practice will be introduced if permission is granted for the current change of use application further increasing noise disturbance.

<https://www.countrycaninesdaycare.co.uk/>
<http://www.bekspets.co.uk/doggy-play-barn.php>
<http://theanimalodge.co.uk/about/>
<https://www.ribblevalleykennels-cattery.co.uk/dayboarding>

Please see our misgivings under Hours of Opening in respect of use of the indoor arena to sustain both the existing equine business and the proposed doggy day care service to support this concern. Also, see below the reference to the introduction of livery services under Highway Safety below, that evidences the applicant extending the equine services. This record of extending services gives us cause for concern that the doggy day care services could also be extended.

Our principal concern regarding this change of use application is in respect of noise pollution/nuisance as outlined above. However, there are a number of other features and inconsistencies within the application, detailed below, that give us concern and cause to believe that the development is ill conceived, will increase the risk of traffic related accidents and not necessarily be operated as outlined within the application and supporting documentation.

HIGHWAY SAFETY

The applicant states they will collect up to 12 dogs and return them home once each day. This is at odds with many other doggy day care services where the onus is on the owners to drop off and pick up their dogs.

<http://www.cowhillkennels.co.uk/doggy-daycare/>
<https://www.auntiesdoggiedaycare.co.uk/preston/daycare-puppy-club>
<https://www.gooddogsdaycare.com/daycare>
<https://play-paws.com/pricing-tables/>

In instances where doggy day care businesses offer a taxi or pick-up service, it tends to be tailored to the dog owners' specific working pattern or time/day/half day requirements and therefore necessitates multiple collections/drop offs. We are concerned that this will be the case and result in increased traffic on a narrow lane increasing risk of accidents with pedestrians and vehicles. Our scepticism is also underlined by the fact that there is no mention of provision for specially converted vehicles capable of carrying multiple dogs securely or provision for parking for these additional vehicles on site.

It should be noted that the postcode PR3 3BN detailed on the applicant's social media site covers a wide area and not specifically the address of the development. This is evidenced on the most commonly used web search site, Google Maps:

<https://www.google.com/maps/place/Preston+PR3+3BN/@53.8057226,-2.6103683,15z/data=!3m1!4b1!4m5!3m4!1s0x487b76af8a4ae80f:0xcd0af5bd8c6d79da!8m2!3d53.807827!4d-2.6004927>

In addition, it is not address specific on many sat nav systems and has resulted in horseboxes mistakenly trying to access unsuitable farm tracks and a local farmer putting a barrier in place to deter vehicles getting stuck where they cannot turn around. Undoubtedly doggy day care will exacerbate this problem and therefore, together with the issues concerning highway safety outlined above, we object to the change of use at the proposed site.

Furthermore, the original equine facility application (3/2008/0454) set out a business plan to create a high-end stud which would aim, amongst other things, to breed Horse of the Year winners. The application was granted for a horse breeding facility with indoor arena, stabling and parking. The comments from the Highways Engineer, Martin Nugent, that were obtained as part of the consultation process and contained in the Design and Access Statement, page 2 states, "Martin Nugent expressed the view that the level of traffic as indicated to him would not cause him to raise an objection to the proposal since it would be similar to agricultural traffic levels. However, if the proposal had been for livery stables with or without an indoor arena hosting events, he would have raised objections as the traffic levels would not have been suitable along Alston Lane". Subsequently, RVBC approved the application but placed conditions reflecting the above concerns of Mr Nugent. The current operation at Ribble View Farm now offers under its services "Holiday Livery – keep your horses in work whilst you go away". Despite the comments and conditions, the original stud has transformed to a stud/livery and now seeks to operate as a doggy day care centre. On the evidence of this change of use, it is easy to see a transition from doggy day care to kennelling or even puppy farming which is more closely associated with the equine breeding model.

HOURS OF OPENING

The application form states the opening times to be 0700 – 1900hrs, Monday to Friday. However, the noise report states 7am – 7pm, Monday to Friday and 9am – 4pm, Saturday and Sunday. Furthermore, the Design Statement specifies 7am – 7pm without reference to the days of operation.

Considering this ambiguity/inconsistency we are only left to assume that it has been stated as such to cause confusion and provide licence for the applicant to operate whenever they want within the widest parameters. We do not believe this to be acceptable and would expect there to be firm, transparent opening hours within any application or approval.

Furthermore, it seems incredulous that the current equine business that utilises the arena for training and rehabilitation purposes can continue to function if the arena is in use for doggy day care. The summary on the RVBC Planning website states the existing livery stable business will continue and the existing indoor arena will be shared by horses and dogs. The original permission for the equine development allowed for operating hours between 0600 – 2200hrs. However, doggy day care will, according to this new application, operate between 0700 – 1900hrs, effectively reducing equine use by 75%. This cannot be sustainable unless something has been omitted from the application, for instance the use/extension of the external run or use of outside paddocks.

FARM DIVERSIFICATION

The Design Statement makes great play on the description of the development as farm diversification using the description to strike a note with Core Strategy/policy objectives. In reality, the property ceased to operate as a farm many years ago. It was noted in the consultation response, dated 21 August 2008, from the Director of Property Services at Lancashire County Council to the original arena/equine facility development (3/2008/0454) that states on page 2 Ribble Farm Details, "Whilst the agricultural land associated with the commercial farm unit remains the same together with that of the agricultural buildings, the fixtures and fittings within the buildings etc have been removed. Two buildings are steel frame structures, one 6 bay long and the other 3 bays long which are no longer utilised for any specific purpose". The consultation response also notes that equine does not qualify as agricultural/farm usage. As evidenced on page 4 Assessment, the Land Agent states that although the application is described as Agriculture, he "Does not feel any respect of the application does accord with the definition of agriculture".

We ourselves live in a property referred to as Stubbins Farm and although we graze sheep on 10 acres we are a farm in name only, not in practice or under any recognisable planning definition. The same applies to Ribble View Farm.

We therefore contest that any reference, statement or argument that the development fits any Core Strategy/policy objective to support farm diversification should be dismissed when considering the current application as it does not apply to this type of enterprise.

EMPLOYMENT

The current application form indicates that there will be an increase or decrease in the number of employees. However, it would appear that the number of F/T and P/T employees remains the same. In our opinion this requires further clarification if the existing equine business operation is to continue and the facility expanded to incorporate a doggy day care centre involving the collection and return of up to 12 dogs to their owners. The anomaly raises concerns about the nature of the businesses and veracity of the application and supporting documents.

We would be grateful if these comments and observations can be taken into consideration when determining the impact this proposed change of use will have on impact on the local residents including noise, the impact on the character of this area of Open Countryside and the effect on highway safety.

Yours sincerely

PAUL MOREY

PATRICIA MOREY