

From: [REDACTED]
Sent: 18 August 2022 16:05
To: Planning
Subject: Planning Application Reference 3/2022/0705


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PLANNING APPLICATION REFERENCE 3/2022/0705

SITE AT: LAND OFF MOOR LANE, WEST BRADFORD CLITHEROE.

PROPOSAL: USE OF LAND AS HOLIDAY SITE FOR 12 NO. LODGES, ACCESS, LANDSCAPING AND ANCILLARY WORKS.

I WISH TO OBJECT to the above planning application and in doing so make the following observations;

1. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. (S38(6) of the Planning and Compulsory Purchase Act 2004 and S70(2) of the Town and Country Planning Act 1990.)
2. The purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways...an economic, a social and environmental objective. (Paragraph 2.8, NPPF 2021).

The site location – Effect on the character of the area and the environment.

3. The site is within an Area of Outstanding Natural Beauty (AONB). One of the key Strategic Objectives of the Council includes “Respect, protect and enhance the high-quality environment and biodiversity in the borough” (Core Strategy 2008 – 2028. Paragraph 3.11).
4. Although there are policies supporting development for recreational purposes these are not without limitation. Core Strategy Policy **EN2: LANDSCAPE**, requires, “The landscape and character of those areas that contribute to the setting and character of the Forest of Bowland Areas of Outstanding Natural Beauty will be protected and conserved and wherever possible enhanced”. The proposal is in direct conflict with these requirements.
5. The Cumulative effect - There is an existing large holiday/residential park of lodges, known as the Three Rivers Woodland Park, to the east of the proposed site which consists of over 270 units. In addition, planning permission has been granted at Eaves Hall for a further 15 eco lodges and infrastructure. (Application 2020/0544 refers). Consideration must be given to the cumulative effect of adding a further similar development of holiday accommodation in this location. It will extend the 47-acre area of agricultural land already relinquished for lodges at the Three Rivers Woodland park onto additional agricultural land and area designated as AONB when there is already an extensive provision for tourism in the immediate area.
6. This is an area of national and international importance because of its unspoiled and richly diverse landscapes, wildlife and heritage. The proposal to erect an additional 12 log cabins on this parcel of land will result in the loss of valuable grassland and significant increases in urbanisation. The log

cabins will be an incongruous feature in this rural landscape and allowing this proposal will be contrary to Policy EN2.

7. The Council's own policy states, "It is important to ensure development proposals do not serve to undermine the inherent quality of the landscape." (Core Strategy, Paragraph 5.2)
8. Paragraph 5.6 of the applicant's planning statement states, 'the site is fully enclosed, established by its well vegetated boundaries. These will visually confine the impact of the proposals from the surroundings'. However, this is not accurate as the site is bounded by a post and wire fence to the northern and southern boundaries and a Public Footpath (FP10) crosses the site. Although new tree planting is proposed along the northern boundary of the site the trees will take a number of years to become established and in the meantime the lodges would be detrimental to the visual amenity of walkers using the footpath and walking on the nearby fells. It is not considered that "the proposal will protect the character of the AONB and preserve and enhance its natural beauty, in accordance with policy requirements", as asserted by the applicant.
9. **EN3: SUSTAINABLE DEVELOPMENT AND CLIMATE CHANGE** requires "All development should optimise energy efficiency by using new technologies and minimising the use of energy through appropriate design, layout, material and landscaping and address any potential issues relating to flood risk". There is no reference to how climate change will be addressed and no reference to energy efficiency or the intention to use new technologies. The proposal is therefore in conflict with Policy EN3.
10. *"Grasslands play a key role in climate mitigation, via removing greenhouse gases from the atmosphere, enriching soils, and reducing flood risks. They are also botanical treasure troves, home to countless native species of flowers and pollinators that underpin many of our natural and agricultural ecosystems. Some of our most enigmatic species of butterflies and moths rely on grassland landscapes for their habitats. Grasslands are critical pollinator reservoirs.*

The eradication of 97% of wildflower meadows since the 1940s in the UK grasslands has had a devastating impact on our native wildflowers and fungi, butterflies, moths, and insects – bumblebees in particular... This is already having adverse impacts on our soft fruit industries around the world. 84% of all UK crops are dependent on pollination and we now import in the region of 70,000 boxes of commercially farmed bumblebees to carry out this critical ecosystem service. We no longer have enough wild bees for basic pollination services". ("Putting the Jewels back in Nature's Crown"; Dunn. Ian

[https://www.plantlife.org.uk/uk/blog/putting-the-jewels-back-in-natures-crown\)](https://www.plantlife.org.uk/uk/blog/putting-the-jewels-back-in-natures-crown)

Highway Issues

- 11) The access to the proposed site is positioned just beyond a bend, on a narrow part of Moor Lane where it is single track and the national speed limit of 60mph applies. The proposed access is currently a farm entrance to the agricultural field and this area is used as an informal 'passing place' when two cars meet travelling in opposite directions. It is not possible to widen the road at this point and cutting back existing vegetation as suggested by the applicant will not provide an acceptable visibility splay and allow for two vehicles to pass or for vehicles to enter and exit the site safely. Furthermore, the lane is used extensively, by walkers and mountain bikers and horse riders - due to it being a Public Bridleway - to access Waddington Fell. If a walker is walking along the highway at time when a vehicle is passing, the walker has to stand into the trees which line the road. Should vehicular movements be increased due to holiday makers coming to the site the danger to walkers, cyclists and horse riders would also be increased. The lane is also used for movement of animals and farm machinery.
- 12) The Management Plan submitted by the applicant, states that each lodge will only have parking for one vehicle yet the planning statement acknowledges the lodges will attract couples and friends wishing to holiday together. There will be no way of restricting two couples arriving at the site in two vehicles. When this occurs, there will be no provision to park the second vehicle.

Noise

- 13) It is suggested that noise on the site will be controlled by restricting arrival and leaving times of holiday makers. However, the purpose of the lodges is to provide accommodation for short holiday stays. The nearby Eaves Hall is a popular wedding venue and because of its remote location it is likely wedding guests will look for accommodation on the proposed site. It is therefore envisaged that wedding guests will return to the lodges late at night after the wedding party and late-night noise will be a natural result of this use.

General Considerations

14) POLICY DMG1:

In determining planning applications, all development must:

- be sympathetic to existing and proposed land uses in terms of its size, intensity and nature as well as scale, massing, style, features and building materials.
- consider the potential traffic and car parking implications.
- ensure safe access can be provided which is suitable to accommodate the scale and type of traffic likely to be generated.
- consider the environmental implications such as sssi's, county heritage sites, local nature reserves, biodiversity action plan (bap) habitats and species, special areas of conservation and special protected areas, protected species, green corridors and other sites of nature conservation.

The proposal is contrary to the general considerations specified in DMG1.

- 15) **POLICY DMB3: RECREATION AND TOURISM DEVELOPMENT** is the policy the applicant is relying on for the success of the proposal. However, the policy supporting recreation and tourism is not without its limitations and the following criteria must be applied;

- *the proposal must not conflict with other policies of this plan;* - It has been demonstrated in this objection letter that a number of other policies are conflicted. (See above)
- *the proposal must be physically well related to an existing main settlement or village;* - The proposed site is separated from other development by Moor Lane/Eaves Hall Lane and is not physically well related to an existing main settlement or village.
- *the development should not undermine the character, quality or visual amenities of the plan area by virtue of its scale, siting, materials or design;* - As previously stated the lodges are an alien feature in this area of AONB and the site is only well screened along the western and eastern boundaries. Clear views of the site are seen from the northern and southern boundaries and from the Public Footpath. New tree planting will take time to become established and in the meantime the development on the site will be detrimental to the visual amenity of local residents and visitors to the area.
- *the proposals should not generate additional traffic movements of a scale and type likely to cause undue problems or disturbance. where possible the proposals should be well related to the public transport network;* - The access is limited and the required visibility could not be achieved. The highway is narrow and additional traffic is likely to cause undue problems and disturbances.
- *the site should be large enough to accommodate the necessary car parking, service areas.* – It has been illustrated this requirement cannot be fulfilled.

In the forest of Bowland Area of Outstanding Natural Beauty the following criteria will also apply:

- *the site should not introduce built development into an area largely devoid of structures (other than those directly related to agriculture or forestry uses).* – This needs no further comment.

16). Conclusion

It is clear this proposal does not accord with the requirements of Core Strategy Policy EN2, Policy EN3, the General Considerations of Policy DMG1 or DMG3.

In addition the proposal does not fulfil the requirements of the NPPF 2021 which states at Paragraph 174, decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – Paragraph 176 goes onto say that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues...The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts.

As a result, I request that this application be refused permission.

