

Sent: Tuesday, May 14, 2024 12:24 PM To: Ben Taylor <Ben.Taylor@ribblevalley.gov.uk> Subject: Objection To Application Ref 3/2024/0269

A External Email

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Dear Mr Taylor

Further to the submission of my Objection Statement (7th May 2024), attached is an updated version dated 14th March 2024 which includes Paragraph 3.5 commenting on the recently submitted amended floor plans.

I would stress that the amended proposals for cycle storage within each individual unit, rather than enhance the the principle of the development, is a detriment to the living standards which would be created and further highlights the unsuitability of the proposal as a whole.



OBJECTION STATEMENT

1

Re:- Application Ref 3/2024/0269

Proposed change of use of ground floor unit (Use class E) and first floor flat (Use Class C3) to House in Multiple Occupation with up to eight residents (Use Class Sui Generis) including removal of shop front and replacement with two ground floor windows and addition of new door and window to side elevation.

Ground Floor Unit and First Floor Flat 27-29 Bawdlands Clitheroe BB7 2LA

1: Clarity of Proposal: There appears to be some lack of certainty in the number of residents the proposed development involves. The description on the application refers to "up to 8 residents" while the Design Statement says that the "These rooms are designed as double rooms, but it is "envisaged" that all will be single occupancy"?

2: Planning History: In the Planning History of the Design Statement, 2 previous planning applications are noted, however, there are a number of later Planning Applications relevant to the building and current proposal, one of which (Ref 2.3) has a significant impact by virtue of amenity and design on the suitability of the property to be used as one of multiple occupation.

2.1: App Ref 3/2019/0200: To develop workshop (B1) into a studio (D2) for martial arts classes and other health and fitness related activities.

Approval of this application was limited until on or before 10th May 2020 when the building had to revert to its previous use.

Condition No 5 on the approval for the above application states: "The use hereby approved shall only operate in conjunction with the business at 27-29 Bawdlands and shall not be independently operated as a separate unit/business.

2.2: App Ref 3/2020/0311

To develop workshop into a studio for martial arts classes and other health and fitness related activities. Resubmission of 3/2019/0200

Condition No 4 on the approval for the above application states: "The use hereby approved shall only operate in conjunction with the business at 27-29 Bawdlands and shall not be independently operated as a separate unit/business.

2.3: App Ref 3/2022/1080

Removal of condition 4 (operations) of planning permission 3/2020/0311 to allow nos. 27 and 29 Bawdlands to exist as separate units.

2.4: It is important to note that the workshop was originally garaging (located over the rear yards) for the commercial and private vehicles associated with No's 27 and 29 Bawdlands. The approval of application Ref 3/2022/1080 has removed any and all potential garaging / storage / ancillary space to No's 27 and 29 Bawdlands and in so doing the LPA has severely restricted and compromised the suitability of any future use for any type of domestic use.

3: Traffic / Highways

3.1: It is noted that LCC Highways offer no objection to the current proposal, stating that there is currently no parking associated with the property, however, this is solely because the parking (4no vehicles) associated to No's 27 & 29 was removed by virtue of approval of the application noted above.

3.2: It is also noted that in the Delegated Report for Application Ref 3/2019/0200, that following concerns raised by local residents and the Town Council, the planning officer stated that "there is adequate on street parking available to accommodate any additional parking demands created by the proposal". This statement is difficult to understand, it is factually incorrect. Ignoring the clear and obvious problems associated with traffic volumes in general and lack of parking in particular, simply to enable applications to be approved, does not make the problems go away, it exacerbates them. On street parking on Corporation Street and along Bawdlands, was at the time of the application and currently is extremely limited, with demand significantly higher than availability resulting in a detriment to the amenity of the residents.

The inclusion in the Design Statement that there is a public car park on Mitchell Street is no mitigating factor. The car park is a pay and display and is often full, particularly at weekends when used by visitors to the Castle Grounds.

3.3: As this proposal is not covered by permitted development and requires a Change of Use application, the LPA is obliged to consider the effects of any potential parking. Although consultation has taken place with the Highways Authority, which considers the proposal to be in a sustainable location with regard to transport on the condition that the cycle store is provided. Importantly, this does not and cannot exclude the possibility that the proposal will generate additional traffic and consequently a requirement for parking, which simply is not available. Any provisions put in place in any development to discourage the use of the private car simply cannot be used as a "get out of jail card" to continue the culture of rubber stamping developments, when the physical evidence of too much traffic and a lack of car parking is clear to see by all. This development has the potential to create a minimum of 8 additional cars and consideration to the fact, irrespective of any provisions must be taken into account seriously.

3.4: In the LCC highways report there is a Condition that "A minimum of 8 bicycle spaces be provided. These may be provided in a cycle shed located within the development". This condition obviously impacts significantly on the proposed layout, as any cycle store provided would need to be incorporated within the structural fabric of the building which highlights the unsuitability of the proposal, there being zero outside / separate ancillary storage area associated with the property.

3.5: It is noted that amended plans dated 10th May, have been submitted which indicate cycle spaces within each of the proposed units. These provisions within the units are wholly unsuitable with regard to providing an acceptable level of accommodation and is further evidence that the building is unsuitable for the proposed use. Further, with regard to the first floor units, to consider that 5 individual residents will take cycles up and down a flight of stairs, is wholly impractical and dangerous, it is fanciful in the extreme. Indicating the cycle spaces within the individual, units does not accord with LCC Highways condition as noted in Paragraph 3.4.

4: Refuse.

4.1: Indicated on the proposed plans are 4no refuse bins. It is generally accepted and the Local Authority should be aware, that HMOs occupied by separate and multiple households generate more waste and rubbish than single family homes. I would therefore, question the adequacy of 4 refuse bins for a HMO containing 8 double rooms, especially taking into consideration the requirement for general waste and separate recycling?.

4.2: The external access to the Bin Store is proposed via the provision of a new doorway to the side elevation on Corporation Street. At the new door position there is a single step indicated on the Proposed Ground Floor Plan with 2 steps indicated on the Proposed Side Elevation, along with a dimension of 350mm from the pavement to the internal floor level. Given the painted plinth line along the side elevation this 350mm dimension would appear to be a rather conservative estimate, with the actual difference in levels being around 500mm at the worst case. A 500mm difference would necessitate the provision of a minimum of 3no steps to comply with Building Regulations requirements. Even considering 2no steps, these would have to be positioned within the curtilage of the building and not form an obstruction over the pavement, the knock on effect would be reduced space within the already very limited Bin Store.

4.3: National Standards suggest that there should be level access to refuse bins as it is considered that the moving of bins up and down steps is difficult, cumbersome and dangerous. It is also a concern that for ease of use, and to avoid the movement of bins up and down steps, the bins could be left outside permanently (as is the case in other areas of the Ribble Valley) to the detriment of the visual amenity of existing residents and blocking of the pavement to the wider populate. The necessity for the refuse bins to be stored inside the curtilage of the buildings structural fabric, once again highlights the lack of any external space or ancillary storage and emphasises the unsuitability of the overall proposal.

5: Feasibility of the proposal with regard to Building Regulations.

5.1: Although this is a planning application, I suggest that in this instance advice from Building Control is a fundamental necessity at planning stage.

5.2: As there are more than 2 dwelling units at first floor level, Building Control may require that the staircase and corridor access to both Ground and First Floor units be provided with a lobby or double door protection to each unit and if so, this could impact on the layout and available usable floor space of the units.

5.3: With regard to the windows to the rear elevation (Staircase, Units 6 & 7). Directly attached to the rear elevation is the Gym referred to in the previous planning applications. As this Gym is now under separate ownership and of a different Use Class (following the LPA approval of application Ref 3/2022/1080), these windows are directly on a boundary wall and there may be a requirement for these to have a designated level of fire resistance. This would require that the windows do not incorporate opening lights which would result in units 6 & 7 being devoid of any natural ventilation.

5.4: It is also noted that the Communal Dining Area to the rear of the property bounds the attached Gym structure, negating the provision of natural light to what is classed as a Habitable Area, this is not conducive to the resident's wellbeing.

6: Amenity of Existing Residents

6.1: There already exists, conversions of former retail properties into multiple housing units (flats) on the corner of Bawdlands / Corporation Street and the corner of Bawdlands / Whalley Street, both within the immediate area and directly opposite the application site. Without doubt, regrettably, these developments have impacted detrimentally on the visual amenity of the area. Approval of this planning application for further multiple units would be an over concentration of such development within the area. It is general accepted that a concentration of HMOs has the potential to lead to amenity issues for none HMO residents, particularly those opposite and adjacent to them due to the intensity of use of the HMOs.

6.2: The proposal requires a number of terminals in external walls to accommodate mechanical ventilation, which are not indicated on the proposed Elevations, there would also be some requirement to ventilate the Bin Store. It is also unclear as to if the En-suite / Kitchenette wastes, particularly to the units bounding Corporation Street are proposed to be run internally or externally. Should it be intended to run the wastes externally this would have a serious detrimental impact of the street scene and therefore visual amenity.

6.3: Detrimental impact on amenity of existing residents with regard to potential increase in demand for parking is covered elsewhere.

7: Summary:

It is concluded that the proposal for Change of Use to a House of Multiple Occupation is at odds to the historic use and heritage of the building and its location.

Should this application be approved it would result in an unacceptable over intensification of multi unit dwellings in the immediate area to the detriment of the amenity of existing residents.

The provision of private outdoor space is not only preferred to accommodate secure vehicle / cycle storage, refuse bins and purposes of drying washing etc, but it is also an essential component, playing an important role in supporting residents physical and mental health and their general wellbeing by providing access to daylight and fresh air and enabling social interaction with other residents within the confines of their homes. There is no external space associated with the proposal whatsoever and it can be argued that this alone renders the proposal for multi occupational use unsuitable, as the principles required to obtain good quality housing are unachievable.

For the reasons outlined in this objection statement, I consider that the proposal is contrary to the relevant Planning Policies and therefore should be refused.

12 May 2024 18:52 Planning Application 3/2024/0269

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For the attention of Ben Taylor

As residents living closely to the location of the planning application, we have a number of concerns about this potential development. There are existing properties on Bawdlands which were formerly businesses and have already been turned into multi-occupational rental accommodation. Whilst we have no concerns about the residents, we do have concerns about the standard of the upkeep and maintenance of these properties which are presumably the responsibility of the landlords.

As a multiple occupied property on a larger scale we feel that his development could potentially cause problems for existing residents.

We recognise that this property is larger in size than others but a development of eight units, sharing one kitchen area, seems to be excessive and have implications which could lead to considerable problems. The Highways Authority, with a distinct lack of local knowledge, appears to have no problems with this development. Bawdlands and Corporation Street already have significant traffic difficulties as a result of previous developments within the surrounding area. The volume of traffic is excessive on these highways and parking for residents of the area is already extremely limited and in some cases totally unavailable but the highways authorities have never taken any account of this. It is perfectly possible that potential residents in this property may have motor vehicles and thus add to the problems. We cannot visualise them, as residents, parking in Mitchell Street car park, which is Pay and Display. It has been suggested that these new residents could park bicycles in a rack provided within the property. On which planet is this planning officer living!!

Additional residents, possibly up to sixteen people in one building, may be a threat to the peace and security of existing residents and will also generate a considerable amount of extra rubbish in the area.

Whilst the property is left unused it will no doubt decline even further but this planning application is not a viable solution.

Contact Centre (CRM) <contact@ribblevalley.gov.uk> 12 May 2024 18:41 Planning Planning Application Comments - 3/2024/0269 FS-Case-613800959



Planning Application Reference No.: 3/2024/0269

Address of Development: Ground and 1st floor flats, 27 - 29 Bawdlands, Clitheroe, BB7 2LA

Comments: I feel this development is totally unsuitable for the area for a number of reasons -There is no parking provision at all proposed for a house with up to eight residents, however, given the suggested double rooms it may by sixteen ! The area is busy enough from both a parking point of view and general traffic on what can be very busy roads.

The development itself is totally unsuitable for such a large number of residents with no outside space, inevitably people will end up literally spilling on to what is a very narrow pavement. The area is populated by young families and elderly residents, a development of this type is totally unacceptable for such an area.

If a HMO is required for the area there is a property opposite the Crown public house which I believe is owned by the Council which would fit the bill far more appropriately than Nos 27 - 29. It has been unoccupied for at least four years !

1 3 MAY LULA

For the attention of Ben Taylor Planning Officer Ribble Valley Borough Council Church Walk CLITHEROE BB7 2RA

PLANNING APPLICATION NO 3/2024/0269

Dear Mr Taylor,

I wish to make a strong objection to the proposals to convert 27 and 29 Bawdlands to a house of multiple occupancy with eight apartments. In my opinion this is gross overintensification for development of the property.

- The provision for waste collection and removal shown on the plans is totally inadequate. It appears that a space for four bins will be created between two of the ground floor rooms, with a NEW access to Corporation Street which is not declared on the application. Presumably two bins for non-recycled rubbish and two for recycling are considered sufficient for a minimum of EIGHT adults (some of the rooms claim to be doubles). Does storage of the bins inside the building comply with planning law. Furthermore there is already a problem with rats in the area as a result of irresponsible waste disposal. I put my concerns in an email sent to RVBC on 26th April 2024 attaching two photographs showing rubbish on the back street.
- Nowhere on the plans is there any provision for storage of basic household equipment and cleaning materials. Are we to suppose that no cleaning will ever be necessary.
- Corporation Street is already hazardous with residents parking on both sides of the road and its increasing use as a short cut between Thorn Street and Bawdlands. This has been even worse since the gym at the rear of 27/29 opened. Several days a week even more vehicles clutter Bawdlands and Corporation Street on double yellow lines together with dangerous pavement parking. Even if potential occupants of 27/29 do not possess vehicles, the likelihood of taxis dropping off and picking up will add to the existing problems. A Corporation St resident has taken to parking on the back street of Bawdlands behind numbers 27 to 43 preventing residents accessing their garages and preventing access for emergency services.

- This development would no doubt result in parking and congestion problems and also affect the value of the residential properties. I am concerned that the development would end up looking very much like the frontage of the flats at numbers 23 and 119A and 119B Bawdlands which I consider to be a eyesore and in a state of disrepair and cannot understand why RVBC have not taken action re Health and Safety.
- It seems that the applicant hopes to maximise the income from this property with absolutely no consideration of the dire consequences and the wholly detrimental effect of the amenity of existing domestic dwellings.
- Finally I would just like to ask why I as a resident of Corporation St was not informed of this planning application. I see that only no's 1, 2, 3, and 5 Corporation Street, 25, 31, 92, 94, 96, 98 and 98-102 Bawdlands, have had notification. I cannot understand why Thorn Street Garage have been sent correspondence when to be a set of the together with no's 33, 35, 37, 39, Bawdlands have not, as we are in closer proximity to the 27/29 property

Clearly the property needs to be brought back into use and upgraded but the proposals in this application are not appropriate.

I Hope and trust that you agree

Yours sincerely



Contact Centre (CRM) <contact@ribblevalley.gov.uk> 13 May 2024 14:53 Planning Planning Application Comments - 3/2024/0269 FS-Case-614067770



Planning Application Reference No.: 3/2024/0269

Address of Development: 27-29 Bawdlands ClitheroeBB7 2LA

Comments: My thoughts are that 8 is far too many units, particulalry looking at the sizes of some rooms. some are impracticably small to fit ensuites in plus bed and wardore etc, 1 being fractionally over 11m2 how is that going to work?

The area around this building (Corporation St) is already chaotic with traffic from the over delvelopment of Henthorn road sites, it is often impossible to proceed along this street from Bawdlands or Thorn St - add in a few more parked cars and the flow will stop completely, impacting back towards the town centre from Bawdlands and the level crossing on Thorn St.

Contact Centre (CRM) <contact@ribblevalley.gov.uk> 14 May 2024 12:28 Planning Planning Application Comments - 3/2024/0269 FS-Case-614365425

Planning Application Reference No.: 3/2024/0269

Address of Development: 27-29 bawdlands bb72la

10 May 2024

Regarding Planning App 3/2024/0269

I submit the following observations in line with other residents & neighbours of Corporation St/ Bawdlands. -

I did not receive an official notification of the proposed change of use of 27-29 Bawdlands.

Car parking is already difficult for residents -8 more people, 8 more cars.

Will the 8 as stated in the application remain 8 or will it increase to a possible 16 persons *

Where will the responsibility for waste/rubbish removal fall. It is not acceptable for bins to be left at the rear of Bawdlands (Corporation St. - Henthorn) - access for cars required for some residents, for example! Rubbish placed in bags is also not acceptable, we already have a vermin problem.

Maintenance / upkeep of building - already a high number of rental properties in the area, most well kept others not so e.g. see 112-116 Bawdlands!!

These are my personal concerns, along with other submissions.

