Sent: 19 August 2025 15:14

To: Planning

Subject: Planning Application Comments - 3/2025/0588 FS-Case-742091111

Lancashire

Planning Application Reference No.: 3/2025/0588

Address of Development: Land East of Clitheroe Road Whalley

Comments: Whalley is portrayed as a "gem" of a village on the Ribble Valley tourist trail. It is noted for its individual shops, cafes and wine bars which all attract visitors. Local estate agents use the location as a selling point and locals feel privileged to live in such a desirable area. I feel that RVBC have a responsibility to keep it this way. I therefore object to this proposed planning application as it will have a detrimental effect for the following reasons:-

Traffic

Whalley already suffers from traffic congestion and lack of parking. Three routes into the village converge at a small central roundabout which results in queues exacerbated by street parking. The application for 77 new homes gives potentially 150+ additional vehicles accessing the village via Clitheroe Road and possibly needing to park.

Services

The impact on our already overloaded GP practise, dentists, nurseries and schools must not be overlooked. These are essential services which have a direct impact on the quality of life. RBVC must avoid additional pressures by refusing to allow additional footfall.

Reputation

There is no doubt that Whalley is a desirable location. Properties worth upward of £million are commonplace and a feature of the area. To propose the building of 77 AFFORDABLE flats/houses on land directly adjacent to some of the most expensive dwellings in the village is neither reasonable nor sensible. In essence it would result in 77 high density dwellings being packed into this low density area of the village. RVBC can surely see that this type of application is completely misplaced.

Ecology

The proposed site is currently a beautiful green field, completely undeveloped. Deer are often seen in the field as are other forms of wild life and fauna and we must seek to protect our green spaces.

Previous application and refusal

I note that RVBC sensibly refused a previous application in an adjacent location with a similar set of circumstances. I would hope that common sense will prevail with this application.

Sent: 19 August 2025 15:17

To: Planning

Subject: Planning Application Comments - 3/2025/0588 FS-Case-742119389

Lancashire

Planning Application Reference No.: 3/2025/0588

Address of Development: Land East of Clitheroe Road Whalley

Comments: I strongly object to this planning application to build "77no. affordable, rented apartments and properties" on this (currently) last remaining green field site between Whalley and Barrow. I have documented my reasons below:-

- 1) Already there has been at least four developments of hundreds of houses along this stretch of Clitheroe road all of them on green field sites without any regard as far as one can tell to the need for open green spaces and all the wildlife that they support the applicants submission about the impact on this habitat is way off the mark as deer, hawks, bats and butterflies and other invertebrates are just some of the flora and fauna of this area.
- 2) If there are going to be 77 no. new houses and spaces for 151 cars as per housing guidelines then the amount of traffic arriving and leaving will become intolerable. Whalley is still a small village with extremely limited parking and one can be very sure that in today's modern world, not many people will make the effort to walk or cycle into the village for their supplies.
- 3) With the advent of all the other new homes in this locality it has been noticeable how little extra infrastructure (for example NHS/GP Services, schools dentists community centres etc) has been provided either by the council or the developers or even the national Government which strains the resources that we have around this locality to breaking point.
- 4) I note that a previous application to develop sites close to this area was submitted in 2020 and went to appeal after RVBC refused permission and this was also refused on appeal in very similar circumstances.

In conclusion - this application on this site is separate and unconnected to the village with no planning development status as unallocated land and sits outside the settlement boundary. I would submit this is the wrong proposal on the wrong site and humbly request that it be refused.

Sent: 19 August 2025 15:43

To: Planning

Subject: Planning Application Comments - 3/2025/0588 FS-Case-742131986

Lancashire

Planning Application Reference No.: 3/2025/0588

Address of Development: Land east of Clitheroe road whalley

Comments: Whalley simply can't sustain any more new housing developments – the infrastructure just isn't there. Roads, schools, and services are already stretched to breaking point, and adding more homes without proper investment will only make things worse



15th August 2025

Dear Sir/Madam,

Re: Planning Application No. 3/2025/0588

LETTER OF OBJECTION

1. We write to object to the grant of planning permission.

Introductory Comments

For the record, we should say that we did not receive a copy of the leaflet said to have been delivered to 2000 households in March 2025: see paras 3.30 and 3.21
of the Statement of Community Involvement (SCI). We find this remarkable,
of the Statement of Commany and would be
given our proximity to the site
interested in the applicant's explanation. If we had received it, we should
immediately have responded (as we now do to the notice letter, which is the first

- 3. In passing, it may be worth noting that, in any event, the leaflet (Appendix 1 to the SCI) is misleading in that it illustrates a bungalow which is not a type of building proposed. Had the proposal been for bungalows rather than houses, we might not have objected, given that our principal material planning objection is (see below). Indeed, we are not against further building in Whalley in principle. Some years ago, there was a proposal to build a single house on this very site and we did not object (the application presumably was rejected or withdrawn). More recently, in 2021 and 2022 we did not object to the most recent planning applications of which we had notice, as they potentially affected us (namely Applications Nos.3/2021/0583 and 3/2022/0110), because we were not overlooked in that the proposed development was on the opposite side of Clitheroe Road to our boundary with that road.
- 4. Our objections, in order of priority, are:

we had heard of the proposal).

- (a) leaves 5-7 below);
- (b) Proximity to Protected Trees/Safety (paras 8-9 below);
- (c) Traffic Congestion (paras 10 -11 below);
- (d) Traffic Safety (para 12 below);

- (e) Infrastructure (paras 13-15 below);
- (f) Noise Disturbance (para 16 below);
- (g) Other Matters (para 17 below).

Loss of Privacy/Overlooking

5.	<u>This is our principal objection</u> . The proposed development would be very close
	between. The site plan shows no fewer than 20 two-storey house plots (Nos.
	n two blocks of 10
	and accordingly only
	the site plan, at least 10 of these houses would of
8	
2	. In case of any doubt,
	we would invite the planning officers or committee members
	If indeed the proposal were tor
	bungalows at that location our objection would not apply, but it is for 10
	two-storey houses.

- 6. Further, the illustration of that block of ten houses, as shown in the Street Scene drawings, shows only a low fence, at ground floor level. The Coloured Plan reveals that it will be only 1.2 metres high. Accordingly, in addition to loss of
 - In the event of grant of the application, contrary to our objection, we would ask the planning committee to make it a condition that the fence is about 2 metres high. Is this not indeed a common condition to protect garden privacy (see, e.g., the Hawthorn Road development in Barrow where garden fences are 1.8 metres high). Please note that even if there were bungalows at that location this objection and/or condition request would still apply.
- 7. We would respectfully submit that the application should be rejected on this ground alone. Alternatively, if the planning committee is minded to allow some building development, we would submit that it be limited to 57 houses by refusing permission for plots 13-22and 37-46 and requiring no building within 25 metres of the three TPO trees at the boundary. In the further alternative, allow only bungalows in that location. In any event, a 1.2 metre boundary fence is too low

Proximity to Protected Trees/Safety

8. As we read it, the application does mention the three mature Lime trees which are on the same side of Bramley Meade Hall's driveway as the proposed development and so are at its boundary, but we submit that the Tree Impact Assessment and Survey refers to these trees inaccurately or misleadingly. The arboricultural consultant says that "no trees along its boundaries" have TPOs. This is wrong. These trees are all marked as G2 on the plan. In the Report they are referred to as being off site by "the highway". But there is no highway.

They are in the verge of the <u>private</u> driveway to Bramley Meade Hall. All have TPOs. Their height is estimated at 25 metres. We note the root protection provision but this is to protect the trees during construction. We are more concerned by safety risks after construction. The report does <u>not</u> however appear to indicate how many metres from those trees the closest of the houses would be, but we would estimate much less than 25 metres. Some of the houses of plots 13-22 and 37-46 would appear to be within a few metres of those very tall trees and well within falling distance. Is there not some restriction on building new houses so close to mature trees? Would it not be good practice only to build at least as far away as their height, in this case 25 metres?

9. Indeed, they would probably be within falling distance of a height and maturity as the G2 trees (and also has a TPO). This tree is <u>not</u> mentioned in the report and is not covered by the root protection proposal although it i

Traffic Congestion

- 10. The SCI blithely brushes away traffic concerns. It seems to lay stress on changing the residents' behaviour. Apparently they will all be presented with a copy of the Travel Plan. The reality is that, as the quoted survey shows, 78% of car-owning residents of Whalley drive to work. This is our own lived experience. The proposed development provides 151 parking spaces and it is overwhelmingly likely that all will be filled, quite possibly added to by pavement parking (again see, e.g., the reality of behaviour on the Hawthorn Road development) and most of the cars will be driven daily onto the already busy local roads. Also, please note that the shortest route from this development to the Whalley By-Pass would be to turn left out of the new entrance, then left again along Wiswell Lane. Wiswell Lane is a road without marking which was lightly used before the (still incomplete) development at Lawsonsteads. The proposed link road through that development from Clitheroe Road to the by-pass remains incomplete - although there are a large number of houses and residents at the Whalley end which opens onto Clitheroe Road, which means that many of the residents of the part-built Lawsonsteads development use Wiswell Lane as a 'rat-run'. As the local highway authority well knows - local councilors have raised the concerns of residents of Wiswell Lane - this has led to serious deterioration of the surface, requiring a regular need for pothole repairs with associated disruption and delay caused by temporary traffic lights). The reality of behaviour on Lawsonsteads suggests that the pious hope of the residents of the proposed development all becoming walkers or cyclists is risible.
- 11. We submit that the planning committee should not consider granting any part of this application until after the Lawsonsteads development has been completed and the purpose-built link road opened.

Traffic Safety

12. The opening of a new entrance/exit onto Clitheroe Road, only a short distance

from the bridge under the by-pass, which would be approached by vehicles from the Clitheroe direction from a 'blind' left hand bend is troubling. At present, the site is only entered occasionally by farm vehicles in connection with the use of the field for sheep grazing and hay baling. The proposed new access point, for daily use by dozens of vehicles on the applicant's own estimate, or well over a hundred on ours, looks like an accident or rather many accidents waiting to happen. We believe that the very extensive off-site work proposed (reducing the speed limit, moving bus stops, traffic calming, a ghost lane at the new junction) means that the risks are plainly recognised but rather than effectively dealing with them we submit that these proposals merely demonstrate that the location inappropriate for such a development.

Infrastructure

- 13. In brief, leaving aside the serious traffic issues, we should raise the provision of schools and GPs, both of which are again rather blithely brushed aside.
- 14. As to schools, we understand them to be currently full and the applicant seems to rely on the idea that there will be falling rolls sufficient to accommodate any children from this development. Firstly, by definition this will be unproven until the future. Secondly for the sake of argument, if every two-, three- or four-bed house had at least one child or maybe two will there be capacity for 69 to 138 children? Thirdly, why should it be expected that parents will move into Whalley on the basis that they must then take or bus their children miles elsewhere?
- 15. As to GPs, we have no doubt that the local surgery is willing to accept more patients, given the capitation basis of NHS funding, but whether that means extra strain on the system and more delay for existing patients and any new ones is another matter. We are both patients of the local surgery. which is very good, but it can already take weeks to get an appointment (certainly if one wishes to see a particular doctor). We are fairly certain that provision was originally made in previous applications in Whalley (e.g. Calderstones and Lawsonsteads) for a new surgery and a new school. Neither has ever been built and presumably amendments were made after the event. This site might be thought, by some, ideal for provision of space for a new surgery or school but we note that the applicant does not include any space for these. Should it perhaps be a condition that they do so (recognizing that of course LCC or NHS might have actually to build them).

Noise disturbance

16. As we said in paragraph 3 above, we have not previously objected to planning applications. However the 2021 and 2022 grants led to unexpectedly prolonged noise disturbance. The work seemed to take forever, perhaps because of the amendment and/or fresh application, but overall it continued through the summers of 2021 and 2022, with drilling, hammering and the like every weekday, making it impossible on many fine days to enjoy the front garden and seating areas of our house. We dread the prospect of what seems,

on the applicant's own timescale to be at least two years of 77-times that noise and much closer.

Other Matters

- 17. We confess that we are not sure whether the following are or are not material planning considerations, but:
- (a) the field may not be a <u>public</u> green space but it is a green space:
- (b) it is also not a case of the field being unused because it is used at different times in the year, for grazing sheep and hay baling and, as such, performs a vital agricultural purpose; and
- (c) it is not uncommon to see wild deer in the field. We do not know whether they live in the wooded area near the bypass or come across the by pass from the Barrow side, but any development will obviously damage their habitat.

Conclusion

- 18. We hope and trust that the planning committee (and the planning officers) will give careful consideration to our objection and either:
- (a) reject the application in its entirety; or
- (b) reject it in part by limiting it to 57 houses or fewer; or
- (c) otherwise imposing such conditions as will prevent any whether this be by requiring only bungalows along the boundary with the Bramley Meade Hall driveway or some other modification.
- 19. One final point. The applicant is (as it boasts in the SCI, para 1.7) a well-established builder of luxury homes, having in particular built "a number of 3 - 6 bed luxury residences" although of course it has "recently" moved into "affordable" housing, but with only one such development identified. Its original desire was to construct 18 such 'self-build' homes. Perforce, it has cut its cloth following the indication by RVBC that such an application would be rejected, by shifting focus, no doubt reluctantly, to the "affordability". Without a doubt, it would still rather build those 18 homes (see SCI para 3.2). All the reasons for not permitting that development would still apply but for the word "affordable" although one wonders what that really means in the context of house prices in the Whalley area even for new small two- and three- bed (again, e.g., the Hawthorn Road development). Nowhere in the supporting documentation can we find any indication of the proposed prices of the proposed "affordable" homes. Can the committee enforcibly ensure that there will be no amendments in due course to increase the size and reduce the number of houses? No doubt, the committee will apply its own experience of other recent developments, large and small, in this area to that question.

From:

Sent: 19 August 2025 10:58

To:

Planning

Cc: **Subject:** Michael Fr Mob Planning application

♠ External Email

This email originated from outside Ribble Valley Borough Council. Do NOT click links or open attachments unless you recognize the sender and are sure the content within this email is safe.

Application 3/2025/0588 Location -land at east of Clitheroe road Whalley Dear Sir/Madam, I object to the application above on the grounds that this type of housing is NOT what is needed in

The ratio of housing and people to amenities and services including doctors schools Nr NHS services is too high.

Transport and traffic through and in Whalley and parking facilities are at breaking point. I live in the centre if Whalley and at school opening and closing times traffic is horrendous. The number of heavy loads and tractors passing through is increasing -it really is not a good situation and to make it worse with more unsuitable housing will be wrong. This is not a good proposal for Whalley, we are saturated already.

Regards

Sent from my iPhone

Sent: 19 August 2025 17:47

To: Planning

Subject: Planning Application Comments - 3/2025/0588 FS-Case-742174260

Lancashire

Planning Application Reference No.: 3/2025/0588

Address of Development: Land East of Clitheroe Road, Whalley

Comments: To whom it my concern,

I object to this application and outline my objections below.

The designated plot for this development is situated in one of the most historically important and beautiful areas of the village of Whalley. The intended aim of this development - the building of small dwellings to sit amongst this spacious and scenic area - risks not only very significantly devaluing adjacent properties (many with important histories), but causing significant negative impact on people's view of what essentially is a beautiful area of the village. I believe that the building of social housing on this site, intended in part for the rental market, makes for a completely nonsensical proposal especially considering the huge number of homes that have already been built in and around the village over the last several years. Traffic within the village is very often now overwhelming for those who live or work in Whalley: the introduction of 77 new homes (easily over 100 cars) would directly increase traffic on the main road into / through the village. Whalley's character as a popular rural village is already at great risk, and this development would damage it still further. I believe this development would put more unnecessary and inappropriate strain on the village's already failing public services (for example, it already takes up to 16 weeks for a medical appointment at the village surgery). Anti-social behaviour has been an ongoing issue in the village for the last 5-6 years - the building of more homes would increase the number of further incidents: rental housing would also mean temporary rentals for weekend visitors, meaning even more people looking to use Whalley as a one-night party town. As a daily dog-walker, I have passed by the proposed site many, many times, both early in the morning and later in the evening and I have seen deer, dragonfly, and bats on the site - building on this site would destroy a natural habitat for a diverse range of animals, birds and other species.

Overall, I consider this application to be wholly inappropriate for the reasons I have provided above, and ask that Ribble Valley Borough Council reject it at the earliest opportunity.

Sent: 19 August 2025 17:58

To: Planning

Subject: Planning Application Comments - 3/2025/0588 FS-Case-742186945

Lancashire

Planning Application Reference No.: 3/2025/0588

Address of Development: LAND EAST OF CLITHEROE ROAD WHALLEY

Comments: This is an objection to the planning application above. Whalley has been so overdeveloped that it has lost its village feel. More development will have a massive effect on wildlife on the field and the area around Whalley just seems to be turning into a concrete jungle. It will put more stress on the roads, village and infrastructure. You can never get into the Doctors now and have to wait weeks to see anyone - having tried to make an

told earliest is 3 weeks off.

More houses will ruin this area and the number of long term residents I have spoken to that are moving out, have moved out or considering moving out of the area is considerable. We are also considering moving away.

Please do not allow this application and keep the existing bit of Whalley green for wildlife to thrive and people to enjoy.

Sent: 19 August 2025 19:05

To: Planning

Subject: Planning Application Comments - 3/2025/0588 FS-Case-742205975

Lancashire

Planning Application Reference No.: 3/2025/0588

Address of Development: field east of Clitheroe Road, Whalley

Comments: I strongly object to this application.

The site is outside Whalley's settlement boundary and lies in open countryside. It is therefore contrary to Core Strategy policies DS1, DMG2 and DMH3, and no justification has been given for overriding these policies.

The application is also flawed because the red line boundary does not include all of the proposed works. Highway changes to Clitheroe Road are an essential part of the scheme, yet they are excluded. This makes the submission invalid, and the flood and traffic assessments based on that boundary cannot be relied upon.

The access point is immediately before the A59 underpass, which is already a known traffic bottleneck and flood hotspot. No proper road safety audit, cumulative traffic modelling or comprehensive flood assessment has been carried out, contrary to Core Strategy DMG3 and DME6.

Finally, the scheme would damage the character of the northern approach to Whalley and harm the setting of historic properties that form part of the village's identity. No Heritage Impact Assessment has been provided, despite the proximity to the Conservation Area.

Conclusion

This proposal is contrary to local and national policy, based on an incorrect red line boundary, and fails to address highways, flooding and heritage impacts. It should be refused.

Kind regards,

Sent: 19 August 2025 17:59

To: Planning

Subject: Planning Application Comments - 3/2025/0588 FS-Case-742187221

Lancashire

Planning Application Reference No.: 3/2025/0588

Address of Development: Land east of Clitheroe Road Whalley

Comments: Objection

I object to the above application on the following material planning grounds:

1) Conflict with the Development Plan (Open Countryside)

The site lies outside Whalley's defined settlement boundary and is designated as open countryside. The proposal is therefore in direct conflict with the Core Strategy's settlement strategy: DS1 (Development Strategy), DMG2 (Strategic Considerations – location of development), and DMH3 (Dwellings in the Open Countryside). No exceptional justification has been provided to override these policies.

2) Harm to Local Character, Heritage Setting, and Settlement Pattern

The northern approach to Whalley is defined by three substantial late-19th and early-20th-century homes; Bramley Mead, Rookwood and Graythwaite, constructed by prominent mill owners and set within mature landscaped grounds. Together they establish a distinctive character area, reflecting the prominence of Lancashire's industrial heritage and creating a verdant, low-density entrance to the village.

While these properties are not statutorily listed, their age (all over 110 years old), architectural quality, historic association, and contribution to townscape mean they could reasonably be considered as nondesignated heritage assets (NDHAs) under the NPPF.

The proposal for 77 generic suburban dwellings bears no relation to this established character. Its compact estate form would appear incongruous and harmful to the setting of these historic homes, undermining the character of the northern approach. This conflicts with Core Strategy policies DMG1 (Design) and DME2 (Landscape and Townscape Protection), and with NPPF paragraph 135(c), which requires development to be sympathetic to local character and history, including the surrounding built environment and landscape setting.

The site also lies on the approach to Whalley Conservation Area. The neighbouring dwelling, The Lodge, was previously subject to conservation considerations during planning for its redevelopment for this reason. In contrast, this application provides no Heritage Impact Assessment. That omission is a significant failing, contrary to Core Strategy policy DME4 and NPPF paragraphs 207–216.

3) Highways and Flooding Risks

The proposed access lies immediately before the A59 underpass, a location long recognised as both a traffic bottleneck and a flood hotspot. The scheme introduces traffic calming measures in which a dedicated right-turn lane for access to the development blocks access for residents of Rookwood entering their northern entrance when travelling from Barrow, I believe this is a fatal flaw with the proposal

The application is unsupported by a road safety audit or cumulative traffic capacity modelling, despite the well-documented congestion in Whalley. The Flood Risk Assessment is also incomplete, considering only the red-line site boundary and ignoring the recurrent flooding at the A59 underpass and the additional surface water runoff generated by the scheme. The red line boundary should include all proposed development.

These omissions conflict with Core Strategy policies DMG3 (Transport and Mobility) and DME6 (Water Management), and with NPPF para 116 (refuse development with severe residual cumulative transport impacts) and paras 170–171 and 181 (flood risk and drainage).

4) Ecology – Inadequate Surveys

The Ecological Appraisal acknowledges 18 trees with potential bat roost features and habitats of moderate suitability, yet relies only on daytime inspections. No dusk/dawn emergence surveys, seasonal bat activity surveys, or full breeding bird and invertebrate surveys have been carried out. This is insufficient given the reasonable likelihood of protected species. It fails to meet the requirements of NPPF paras 187, 192–195 (biodiversity protection), Circular 06/2005, or the Conservation of Habitats and Species Regulations 2019.

5) Deficient Consultation

The applicant's Statement of Community Involvement claims that 2,000 households were contacted by leaflet. Local testimony suggests this was not the case, with many residents entirely unaware of the consultation. Furthermore, consultation letters dated 6 August were not received until 12 August, reducing the statutory 21-day response period by a third.

This undermines meaningful public engagement and calls into question compliance with both the Council's SCI requirements and the NPPF's emphasis on early and effective community involvement.

Conclusion

The proposal conflicts with multiple adopted policies (DS1, DMG1, DMG2, DMG3, DMH3, DME2, DME4, DME6) and key provisions of the NPPF. Specifically, it:

- Erodes the settlement boundary strategy and countryside protection.
- Harms the established historic character area on Clitheroe Road and ignores the approach to Whalley Conservation Area.
- Provides inadequate highways and flood evidence at a known congestion and flood hotspot.
- Submits incomplete ecological surveys, contrary to statutory and policy requirements.
- Fails to demonstrate genuine or sufficient community consultation.

On these sound planning grounds, the application should be refused.

Yours faithfully,



Planning Department Ribble Valley Borough Council Council Offices Church Walk Clitheroe, BB7 2RA

Application Ref: 3/2025/0588

Proposal: 77 affordable dwellings on land east of Clitheroe Road, Whalley

Objection

I object to the above application on the following material planning grounds:

1) Conflict with the Development Plan (Open Countryside)

The site lies outside Whalley's defined settlement boundary and is designated as open countryside. The proposal is therefore in direct conflict with the Core Strategy's settlement strategy: DST (Development Strategy), DMG2 (Strategic Considerations – location of development), and DMH3 (Dwellings in the Open Countryside). No exceptional justification has been provided to override these policies.

2) Harm to Local Character, Heritage Setting, and Settlement Pattern

The northern approach to Whalley is defined by three substantial late-19th and early-20th-century homes; Bramley Mead, Rookwood and Graythwaite, constructed by prominent mill owners and set within mature landscaped grounds. Together they establish a distinctive character area, reflecting the prominence of Lancashire's industrial heritage and creating a verdant, low-density entrance to the village.

While these properties are not statutorily listed, their age (all over 110 years old), architectural quality, historic association, and contribution to townscape mean they could reasonably be considered as nondesignated heritage assets (NDHAs) under the NPPF.

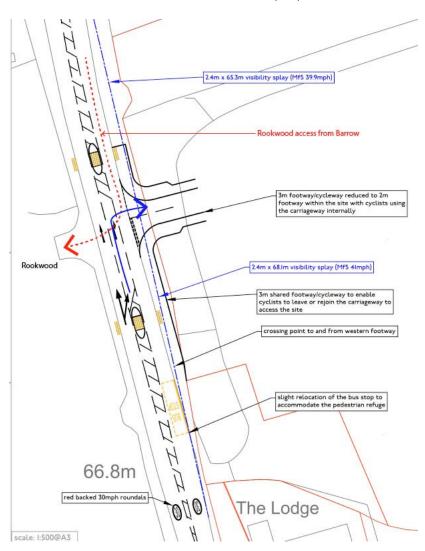
The proposal for 77 generic suburban dwellings bears no relation to this established character. Its compact estate form would appear incongruous and harmful to the setting of these historic homes, undermining the character of the northern approach. This conflicts with Core Strategy policies DMG1 (Design) and DME2 (Landscape and Townscape Protection), and with NPPF paragraph 135(c), which requires development to be sympathetic to local character and history, including the surrounding built environment and landscape setting.

The site also lies on the approach to Whalley Conservation Area. The neighbouring dwelling, The Lodge, was previously subject to conservation considerations during planning for its

redevelopment for this reason. In contrast, this application provides no Heritage Impact Assessment. That omission is a significant failing, contrary to Core Strategy policy DME4 and NPPF paragraphs 207–216.

3) Highways and Flooding Risks

The proposed access lies immediately before the A59 underpass, a location long recognised as both a traffic bottleneck and a flood hotspot. The scheme introduces traffic calming measures in which a dedicated right-turn lane for access to the development blocks access for residents of Rookwood entering their northern entrance when travelling from Barrow as seen in the image below I believe this is a fatal flaw with the proposal:



The application is unsupported by a road safety audit or cumulative traffic capacity modelling, despite the well-documented congestion in Whalley. The Flood Risk Assessment is also incomplete, considering only the red-line site boundary and ignoring the recurrent flooding at the A59 underpass and the additional surface water runoff generated by the scheme. The red line boundary should include all proposed development.

These omissions conflict with Core Strategy policies DMG3 (Transport and Mobility) and DME6 (Water Management), and with NPPF para 116 (refuse development with severe residual cumulative transport impacts) and paras 170–171 and 181 (flood risk and drainage).

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The Ecological Appraisal acknowledges 18 trees with potential bat roost features and habitats of moderate suitability, yet relies only on daytime inspections. No dusk/dawn emergence surveys, seasonal bat activity surveys, or full breeding bird and invertebrate surveys have been carried out.

This is insufficient given the reasonable likelihood of protected species. It fails to meet the requirements of NPPF paras 187, 192–195 (biodiversity protection), Circular 06/2005, or the Conservation of Habitats and Species Regulations 2019.

5) Deficient Consultation

The applicant's Statement of Community Involvement claims that 2,000 households were contacted by leaflet. Local testimony suggests this was not the case, with many residents entirely unaware of the consultation. Furthermore, consultation letters dated 6 August were not received until 12 August, reducing the statutory 21-day response period by a third.

This undermines meaningful public engagement and calls into question compliance with both the Council's SCI requirements and the NPPF's emphasis on early and effective community involvement.

Conclusion

The proposal conflicts with multiple adopted policies (DS1, DMG1, DMG2, DMG3, DMH3, DME2, DME4, DME6) and key provisions of the NPPF. Specifically, it:

- Erodes the settlement boundary strategy and countryside protection.
- Harms the established historic character area on Clitheroe Road and ignores the approach to Whalley Conservation Area.
- Provides inadequate highways and flood evidence at a known congestion and flood hotspot.
- Submits incomplete ecological surveys, contrary to statutory and policy requirements.
- Fails to demonstrate genuine or sufficient community consultation.

On these sound planning grounds, the application should be refused.

Yours faithfully,

From:

Sent: 19 August 2025 19:03

To: Planning

Subject: Letter of Objection – Planning Application Ref 3/2025/0588 (Land East of Clitheroe

Road, Whalley)

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External Email

This email originated from outside Ribble Valley Borough Council. Do **NOT** click links or open attachments unless you recognize the sender and are sure the content within this email is safe.

FAO Stephen Kilmartin

I write to **object** to planning application 3/2025/0588 for the erection of **77 affordable dwellings** on land east of Clitheroe Road, Whalley. While there is support locally for genuinely affordable housing, this proposal is inappropriate for its location and conflicts with local and national planning policies. It would exacerbate existing infrastructure pressures, harm the character of Whalley and risk ecological assets. My objections are detailed below and supported with references to local policies and evidence from the applicant's own documents.

1) Site is not allocated for housing and conflicts with Core Strategy policies

The **Design & Access Statement** confirms that the 8.45-acre site is "currently greenfield and is **not** allocated under any category in the Ribble Valley Housing & Economic Development DPD". It lies outside the defined settlement boundary of Whalley. RVBC's Core Strategy sets out the broad locations for development:

- **Key Statement DS1** requires that "the majority of new housing be concentrated within an identified strategic site located to the south of Clitheroe and the principal settlements of Clitheroe, Longridge and **Whalley**". This site is not one of those allocations.
- Policy DMG2 states that development in the principal settlements should consolidate, expand or round-off development closely related to built-up areas. The proposal would extend housing into open countryside rather than rounding off the settlement.
- Policy DMH3 restricts residential development in open countryside to agricultural workers or other local-need housing. The applicant proposes 77 dwellings unrelated to agriculture.

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By failing to accord with DS1, DMG2 and DMH3, the scheme is contrary to the adopted Development Plan. The planning statement appears to rely on the housing shortfall to justify departure from policy; however, the NPPF requires that decisions be plan-led unless material considerations indicate otherwise. Whilst the NPPF does allow *some* development outside settlements for local-needs housing, the proposed development is far greater in scale than would be required for the local needs of the parish.

2) Highway impact – severe congestion at key junctions

Residents already experience significant congestion through Whalley, particularly at the **King Street / Accrington Road** and **Clitheroe Road / King Street / Station Road** mini-roundabouts. The applicant's **Transport Assessment** (TA) shows these junctions are already operating **over capacity** in the base year (2025) and become much worse in the 2030 scenario, even without this development:

- King Street / Accrington Road mini-roundabout: the TA's modelling shows that in the 2025 base scenario the Accrington Road approach experiences queues of 48.4 PCUs with an average delay of 314 seconds and a ratio of flow to capacity (RFC) of 1.17, i.e., the junction is already over capacity. With committed developments in the area (Lawsonsteads etc.), delays increase to 568 seconds and a queue of 77.9 PCUs. When the proposed 77 dwellings are added, queues rise further (83.5 PCUs; 612 s delay).
- Clitheroe Road / King Street / Station Road mini-roundabout: in the 2025 base scenario the
 Clitheroe Road arm sees queues of 47.3 PCUs with delays of 314 seconds (RFC 1.18); by 2030 with
 committed development the queue increases to 94.6 PCUs and 700 s delay. With the proposed
 development the queue rises to 107.4 PCUs and 781 s delay.

The applicant argues the additional impact is "minimal"; however, **paragraph 111 of the NPPF** states that development should be prevented if its residual cumulative impacts on the road network would be **severe**. Queues exceeding 80 vehicles and delays of ten minutes are unequivocally severe. The TA also acknowledges that both junctions are over capacity even without the development. Adding 77 dwellings (likely >120 vehicles) will worsen safety and congestion on roads already at breaking point.

Furthermore, Lancashire County Council is investing in minor highway improvements through Section 106 funds because existing infrastructure has struggled to cope with recent housing growth. A 2022 local report explained that multiple housing developments in the area necessitated significant education and transport contributions; expansions to Whalley CE Primary School and other schools were funded because **previous infrastructure was inadequate to cope with the scale of development**. The cumulative effect of continuing to add housing without substantial highway upgrades is unsustainable and contrary to the NPPF requirement to ensure **safe and suitable access** (para 110).

3) Cumulative development pressure on infrastructure and services

Whalley has experienced an unprecedented level of residential development in recent years. The **TA** lists committed schemes including the **Lawsonsteads site** which will deliver up to **260 dwellings** plus a primary school and link roads. Other nearby developments (Mitton Road, Clitheroe Road) add hundreds more homes. This proposal for 77 dwellings would add to the **cumulative impact** on:

- **Education:** local primary schools are at or near capacity. RVBC has sought Section 106 contributions from recent developments to fund classroom extensions. A further 77 families will require places that may not be available; the planning statement does not demonstrate how this will be mitigated.
- **Healthcare:** there are limited GP surgeries in Whalley; residents already face long waits for appointments. The proposal offers no funding for expansion of health facilities.
- **Utilities and social infrastructure:** water, sewerage and broadband networks in this semi-rural village are under pressure. The site is outside the logical extension of the settlement and will necessitate new infrastructure.

In combination with other schemes, the development would undermine community cohesion and local services, contrary to **Core Strategy Key Statement DMG1**, which requires that development "**protect and enhance community infrastructure and services**" and be served by appropriate infrastructure.

4) Loss of greenfield land and failure to meet Biodiversity Net Gain

The site comprises **improved agricultural grassland** with woodland and scrub on the margins. The **Ecological Appraisal** notes that the woodland and scrub are of **local value**, supporting **nesting birds**,

foraging bats, hedgehogs, brown hare and badgers. Nine trees with potential bat-roost features would require removal or heavy pruning. Artificial lighting from the development could affect foraging bats, and badgers/hedgehogs would be vulnerable during construction. The NPPF (para 174) requires planning decisions to protect and enhance valued landscapes and biodiversity and to recognise the intrinsic character and beauty of the countryside; building 77 houses on a greenfield site directly conflicts with this principle.

The Biodiversity Net Gain (BNG) report makes clear that the scheme fails to achieve the statutory 10 % net gain required by the Environment Act 2021. It predicts a deficit of 1.25 habitat units and -1.53 tree units; even with on-site habitat creation there is insufficient space to deliver the necessary tree planting, so an off-site biodiversity payment would be needed. This shortfall breaches both national legislation and RVBC's emerging BNG policies. Approving the scheme without demonstrating a clear mechanism to achieve 10 % net gain would be unlawful.

5) Landscape and settlement character

Whalley is a historic village set within the picturesque Ribble Valley. The open field on the eastern side of Clitheroe Road contributes to the rural setting of the settlement when approaching from the north. Introducing 77 two-storey houses with estate-style roads and parking would create a visually intrusive urban edge. Policy DMG2 requires development in principal settlements to be "in keeping with the existing settlement". The proposed layout is suburban and does not respond to the linear village form. There is no existing built form on three sides of the site, so the proposal would not represent rounding off but a major extension into open countryside.

The **Design & Access Statement** admits that the land is irregular in shape and that the proposed layout is a dense network of cul-de-sacs. This contrasts sharply with the traditional pattern of development in Whalley and fails to preserve the character and appearance of the area, contrary to **Key Statement EN2** (landscape protection).

6) Flood risk and drainage concerns

Although the Flood Risk Assessment identifies the site as Flood Zone 1, a watercourse flows through the north-eastern corner, and the ground falls toward this watercourse. Covering 3.42 ha of grassland with impermeable surfaces will significantly increase surface-water runoff. The FRA suggests a need for sustainable drainage systems (SuDS), but the application provides limited detail on attenuation features or maintenance arrangements. Without a full drainage strategy and agreement from the Lead Local Flood Authority, there is a risk of flooding downstream, contrary to NPPF para 167, which requires major development to incorporate SuDS unless demonstrated to be inappropriate.

7) Ecological lighting, noise and amenity

The **Transport Noise Assessment** (not summarised here) and proposed site layout indicate dwellings close to the A59 and Clitheroe Road will experience high traffic noise. Affordable homes should provide a good standard of amenity; however, there is limited information on noise mitigation. In addition, artificial lighting associated with streets and dwellings would affect nocturnal species (bats, hedgehogs) and dark skies. These issues have not been adequately addressed.

8) Conclusion

The proposal is **contrary to the Development Plan** and would cause **substantial harm**:

 The site is an unallocated greenfield site outside the settlement boundary, contrary to Core Strategy policies DS1, DMG2 and DMH3. There is no overriding need to justify departure from these policies.

- 2. The **Transport Assessment** demonstrates that key junctions in Whalley already operate well above capacity and that the additional trips from the development would exacerbate **severe congestion** and highway safety issues.
- 3. **Cumulative development** in Whalley has already placed significant pressure on **schools**, **health facilities** and **roads**, leading to Section 106 contributions to address deficits. This scheme would add further strain with no guaranteed mitigation.
- 4. The scheme fails to deliver the statutory **10** % **Biodiversity Net Gain**, with a recorded **deficit of habitat and tree units**, and would remove woodland and trees used by bats, hedgehogs and other species.
- 5. The suburban estate design would **erode the rural character** of Whalley and produce a visually intrusive urban sprawl inconsistent with local character.
- 6. Surface-water runoff and drainage proposals are inadequately detailed; the presence of a watercourse and change in ground levels pose potential **flood risk**.

For these reasons, I respectfully request that RVBC **refuse** planning permission for application 3/2025/0588. Should the Council be minded to approve the scheme, I ask that it secure robust conditions and contributions to address highways, education, biodiversity and drainage impacts. However, given the fundamental policy conflict and cumulative harm, the only appropriate course is to refuse the application.

Yours faithfully,

