



FAO Stephen Kilmartin planning case officer

Planning Department
Ribble Valley Borough Council

By email: 8th September 2025

Dear Stephen,

RE: Application 3/2025/0588 Full Planning Application for the Erection of 77.no Affordable Dwellings with Associated Access, Gardens, Parking and Landscaping areas.

This letter represents a formal objection to the above application on behalf of [REDACTED]. The letter supplements a letter which has already been submitted by [REDACTED] on the 25th August.

Background

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the adopted development plan, unless material considerations indicate otherwise. These requirements are repeated within the National Planning Policy Framework (NPPF 2024) which sets out the Government's planning policies and details how they should be applied.

This objection relates to both the principle of development and a number of associated material considerations, which will be outlined and expanded upon in this response.

It should be noted, that whilst the supporting planning statement refers to a previous pre-app for the site, this was based on 18 self build units, which is no direct comparison to a development of 77 units.

Relevant Planning Policies

Key Statement DS1: Development Strategy
Key Statement DS2: Sustainable Development
Key Statement EN3: Sustainable Development and Climate Change
Key Statement EN4: Biodiversity and Geodiversity
Key Statement H1: Housing Provision
Key Statement H2: Housing Balance
Key Statement H3: Affordable Housing
Key Statement DMI2: Transport Considerations
Policy DMG1: General Considerations
Policy DMG2: Strategic Considerations
Policy DMG3: Transport & Mobility
Policy DME1: Protecting Trees & Woodland
Policy DME2: Landscape & Townscape Protection
Policy DME3: Site and Species Protection and Conservation
Policy DME5: Renewable Energy
Policy DME6: Water Management
Policy DMH1: Affordable Housing Criteria
Policy DMH3: Dwellings in the Open Countryside and AONB

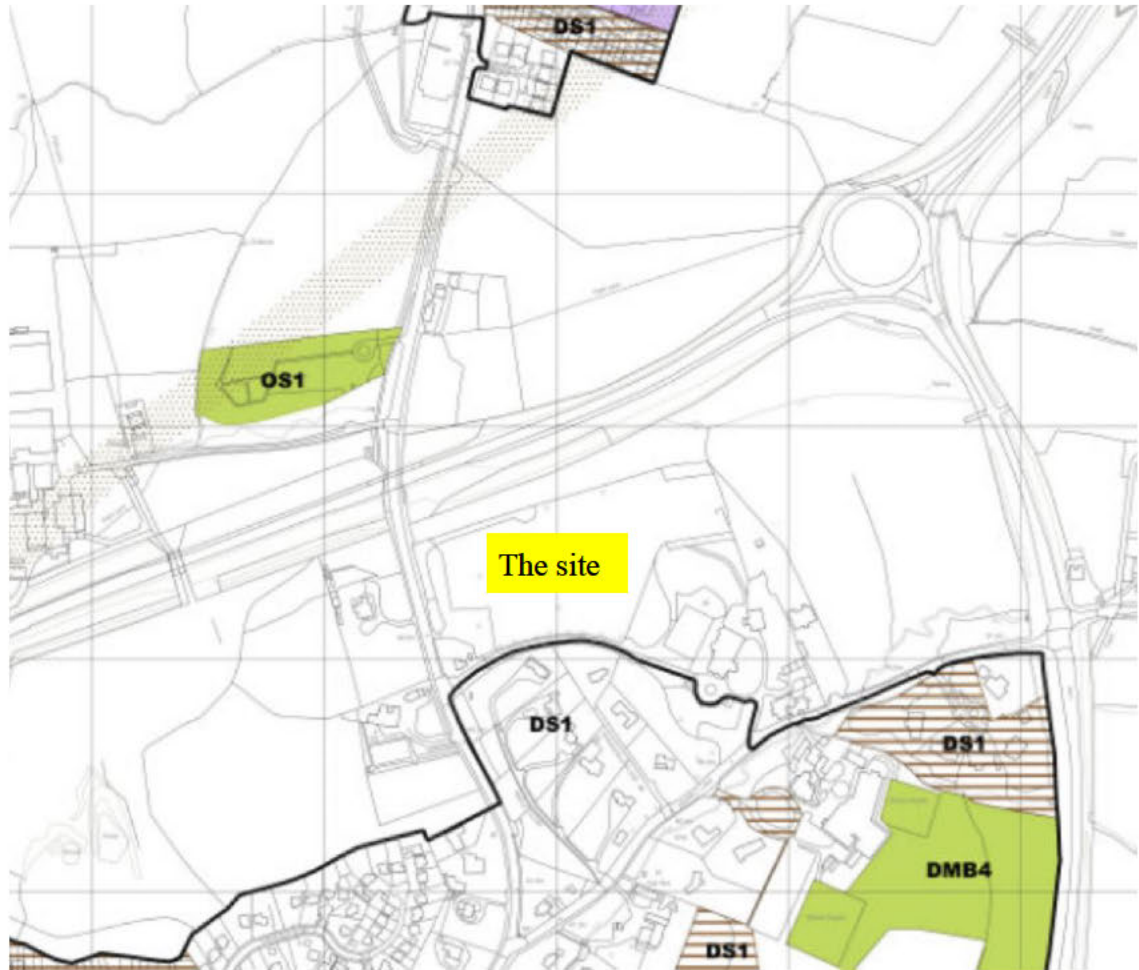
National Planning Policy Framework (NPPF) 2024

The principle of development

Given that the site lies outside the settlement limits, policies DMH3 and DMG2 of the RVCS apply in the assessing the principle of development.

Policy DMG2 – Strategic Considerations

Policy DMG2 of the Ribble Valley Core Strategy seeks to restrict residential development within the open countryside (or outside of defined settlement limits) and Tier 2 Village settlements to that which meets a number of explicit criteria. Key Statement DS1 also reaffirming these criteria and sets out the overall spatial aspirations for development within the Borough.



Map extract taken from the HED proposals map showing the site outside the development boundary in Open Countryside

Policy DMG2 is two-fold in its approach to guiding development. The primary part of the policy DMG2(1) applies to development within the principal settlements of Clitheroe, Longridge and Whalley. This does not apply to this site given it is not within the defined settlement (see extract plan above).

The second part of the policy DMG2(2) applies when a proposed development is located 'outside' defined settlement area or within tier 2 villages. 1-6 of this part of the policy lists exceptions when development could be appropriate. Part 3 of the list states, '*the development is for local needs housing which meets an identified need and is secured as such.*'

The definition of 'local needs housing' as defined within the Ribble Valley Core Strategy which states that '*Local needs housing is the housing developed to meet the needs of existing and concealed households living within the parish and surrounding parishes which is evidenced by the*

Housing Needs Survey for the parish, the Housing Waiting List and the Strategic Housing Market Assessment'.

The proposed development is attempting to use the 'local needs housing', and for the reasons set out below, it is not considered that the proposal complies with DMG2.

Policy DMH3

Policy DMH3 is also applicable given the sites location outside of any defined settlement limits with the policy providing further context stating that:

Within areas defined as open countryside or AONB on the proposals map, residential development will be limited to:

1. Development essential for the purposes of agriculture or residential development which meets an identified local need.
2. The appropriate conversion of buildings to dwellings.....
3. the rebuilding or replacement of existing dwellings.....
4. The creation of a permanent dwelling by the removal of any condition....

The application suggests that part 1 is applicable.

Once again, the development proposal suggest compliance with part 1 on an '*identified need*'. The proposed development is considered to be in direct conflict with Key Statement DS1, Policies DMG2 and DMH3 of the Adopted Ribble Valley Core Strategy insofar that approval would lead to the creation of new residential dwellings, located outside of a defined settlement boundary.

The applicant is using policy exemptions for both DMG2 and DMH3 has for 'local need' alone, and for the reasons set out below it is not considered that proposals are policy compliant.

Policy DMH1 - Affordable Housing

Policy DMH1 is clear in setting out the criteria in which affordable homes within the Borough will be provided for:

Where proposals involve the provision of affordable housing units, the residential development must be expressly for the following groups of people:

- 1. First time buyers currently resident in the parish or an adjoining parish*
- 2. Older people currently resident in the parish or an adjoining parish*
- 3. Those employed in the parish or an immediately adjoining parish but currently living more than 5 miles from their place of employment*
- 4. Those who have lived in the parish for any 5 of the last 10 years having left to find suitable accommodation and also with close family remaining in the village*
- 5. Those about to take up employment in the parish*
- 6. People needing to move to the area to help support and care for a sick, older person or infirm relative.*

Given the 100% reliance on providing affordable homes and using only this policy exception, this is not reflected in the applicants Affordable Housing Statement which is one page within the supporting planning statement. The supporting information does not go anyway in dealing with specific details in delivering affordable homes, and the requirements set out in policy DMH1.

On page 18 of the supporting statement (4.17) it reports that an e mail response from the Council's housing team reported that there was a total of 703 applicants were on the affordable housing waiting list for Whalley. This figure is not backed up by any order of priority following the Council's own DMH1 policy, and whether all these candidates would meet the 6 criteria. It is therefore considered that this argument is misleading and there should instead be reliance on the recently endorsed Affordable HNA 2025.

Housing Evidence base

5 Year Housing Land Supply May 2025

In the Council's most recent 5 YHLS it states that using the Standard Methodology with surplus is 214 dwellings per year, with a 6.2 year supply of housing. On this basis, whether the housing is affordable or not, there is currently no need for additional especially on sites outside the settlement boundary.

Affordable Housing Needs (AHNA) Assessment May 2025

This recently published evidence base document has been endorsed by the Council and is to be used in the determination of planning applications such as this.

The report covers the main issues/topics; area profile, affordable need, need for different sizes of homes and older and disabled people.

Paragraphs 16 – 23 of the report describes the estimated annual need for affordable housing with a break down of the need by sub areas, including Whalley:

Figure 4: Estimated level of Affordable Housing Need by sub-area (per annum)						
	Current need	Newly forming house-holds	Existing house-holds falling into need	Total Gross Need	Relet Supply	Net Need
Clitheroe	22	56	10	89	40	49
Longridge	13	28	6	47	11	36
Whalley	6	13	2	21	8	13
Tier 1 villages	20	43	5	69	19	49
Rest of District	33	55	10	98	15	83
TOTAL	95	194	34	323	93	230

Source: JGC analysis

As the table states, there is an estimated need for 13 dwellings per year. Paragraph 23 of the report clearly states that *‘this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided.’*

Whilst it is recognized that affordable housing is needed across the whole Borough, the NPPF is clear at para 61 that *‘The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.’*

This approach is also replicated in the Council’s own Key Statement 2 – Housing Balance;

‘Planning permission will only be granted for residential development providing it can be demonstrated that it delivers a suitable mix of housing that accords with the projected future household requirements and local need across the Ribble Valley as a whole as evidenced by the Strategic Housing Market Assessment.’

Proposing a development of 100% affordable housing whether on a site within or outside of the settlement boundary, does not give housing choice for all.

Committed Affordable Homes in Whalley

Paragraph 6.13 of the applicant's statement refers to '*an absence of other housing schemes in Whalley coming forward.*' Whalley Manor development in Whalley (3/2018/0914) includes 57 affordable dwellings out of a total 188 homes on this phase of development. The number of affordable homes is proportionate (30% of the overall total) to a wider mix across the site. This takes forward the aim of the NPPF and the Councils main ambitions to have a mix of housing across a development.

In the Council's latest 5YHLS it states that there are 50 completions on this site as of March 2025, with 83 remaining. If you were to compare the latest evidence from Affordable HNA 2025 which states that Whalley has a need for 13 units per year, then Whalley Manor development alone will provide just over 4 years of the suggested need.

Abbey Farm View, Whalley

The case for housing provision in Whalley is different to the main case which the applicant puts forward at Crowtrees Chatburn in which there hadn't been any affordable housing developed in over 25 years. In Whalley and its surroundings, there has been a steady supply of affordable housing units completed on new housing developments over the years such as Abbey Farm View, off Mitton Road (David Wilson Homes) where 41 affordable units have been created out of a total of 116.

Nab Rise, off Billington Road

Nab Rise was a development of 56 units a short walk from Whalley developed out by McDermott Homes. A suitable affordable mix was implemented on the site of 15 units, proportionate to the site and its location.

Dogwood Lane, Barrow (Redrow Homes)

Application 3/2017/0064 granted reserved matters for one of several parcels of land off Whalley Road, Barrow. This phase has a total of 183 dwellings with 57 of these being affordable. This demonstrates that the affordable contribution on site is part of the overall mix and not the only offer.

Other material considerations

Design, Character and Appearance

The proposed layout pays no respect to the immediate area which is characterised with larger housing plots with generous garden areas and abundance of mature trees and hedgerows. Most importantly this stretch of road provides a natural break in the built form from Whalley to Barrow, something which was highlighted as part of an appeal decision discussed below. The layout presents itself as an overly dominant sprawl into the open countryside, and is more characteristic of a suburban housing estate.



STREET SCENE C-C

The NPPF is clear in that design is a key component of sustainable development and seeks to create '*beautiful places*' (para 126). By virtue of the scale and complete discord with the character of the area, it is not considered that the proposed development complies with the NPPF. Furthermore, the development will be in conflict with policy DMG1 which requires development to '*be sympathetic to existing and proposed land uses in terms of size, intensity, nature, scale and massing.*'

Appeal Ref: APP/T2350/W/15/3005882 Meadcroft, Clitheroe Road, Whalley, Clitheroe, BB7 9AD (App ref 3/2024/0684) Appeal dismissed

In July 2015 an appeal was dismissed for 9 new dwellings on land approximately 100m to the north of the site. The key issues were the suitability for housing on the site (the Council at the time had a 5.15 housing supply and a newly adopted Local Plan) and character and appearance. These two sites are separated only by the A59 bridge, otherwise they have a very similar road frontage. Note the Inspectors comments on the character and appearance just on 9 dwellings, whereas the proposed development is 77, making the impact on character and amenity even greater.

Given the close proximity of the proposed Pringle Homes site, the assessment made by the Inspector at the time on the character and appearance is considered to be relevant.

'In this location, and situated in between Barrow and Whalley the erection of 9 new dwellings would be visually divorced from either settlement.'
Para 17

'I consider that it would erode the open area between the two settlements'.
Para 18

'I therefore conclude that by reason of its detached location and prominence from Clitheroe Road the proposal would not be sympathetic to its surroundings and would harmfully detract from the character and appearance of the area. As a result, it would conflict with Core Strategy Policy DMG1 which, amongst other things, states that all new development must be sympathetic to existing and proposed land uses in terms of its size, intensity and nature.' Para 21



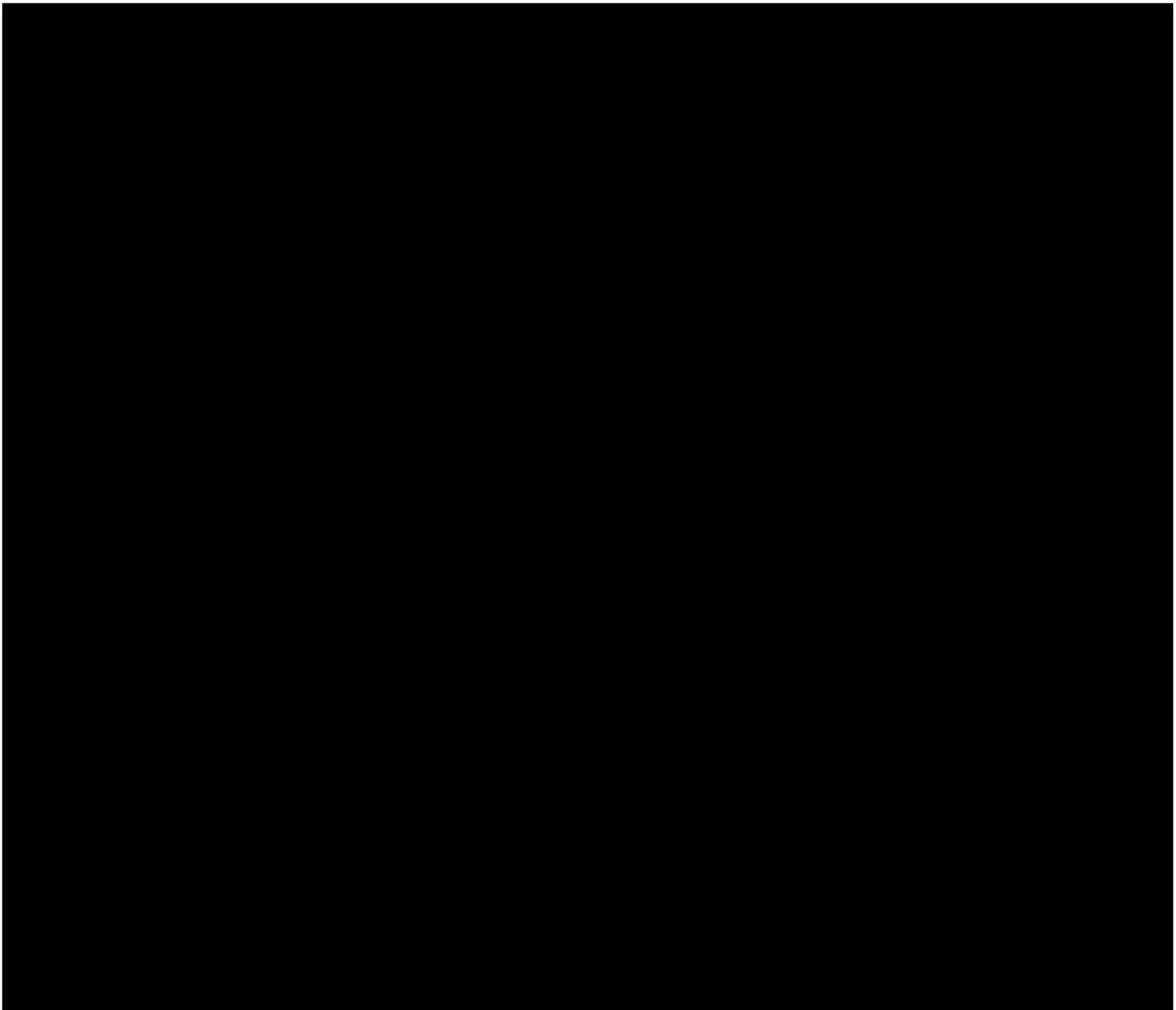
Panoramic photo of the site and frontage along Clitheroe Road

Impact on the residential amenity

The site is bound on three sides by residential development. Bramley Meade Hall sits approximately 70m to the east of the site and shares on long stretch of common boundary with the site. The entire length of the southern boundary is the main access drive to the property which has a characteristic avenue of TPO trees, framing the driveway and then opening out to the currently open field to the north.

Whilst there may be adequate distance from a privacy perspective between existing windows of the Hall and the proposed dwellings, the proposed development abuts itself right up to the existing boundary, at some points there [REDACTED]. [REDACTED] is the [REDACTED] which [REDACTED]. The use of this space will be compromised with the proposed development creating an almost continuous line of built form along the eastern and southern boundary. The site levels will exacerbate this with Bramley Meade Hall sitting at a higher level.

It is considered that the proposals will conflict with Policy DMG1 by virtue of a direct, unsympathetic and overbearing impact of the proposed development on the residential amenities enjoyed by the residents of Bramley Meade Hall.



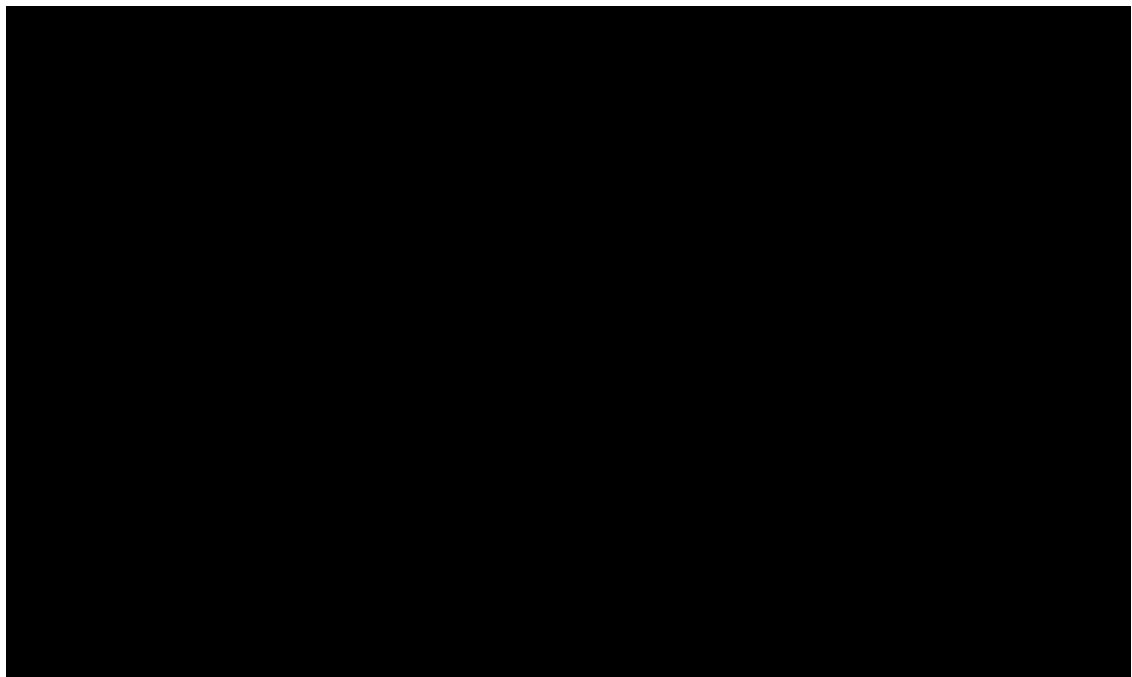
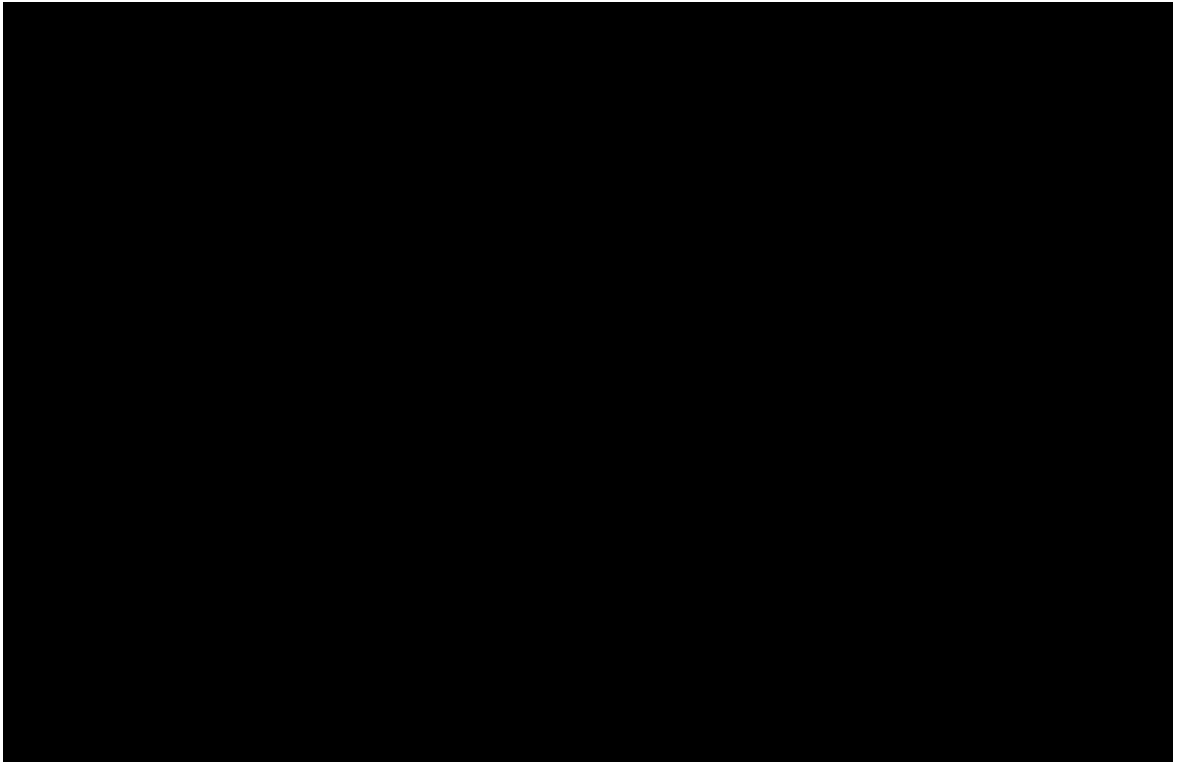
Highways - this has been addressed in the letter dated 25th August

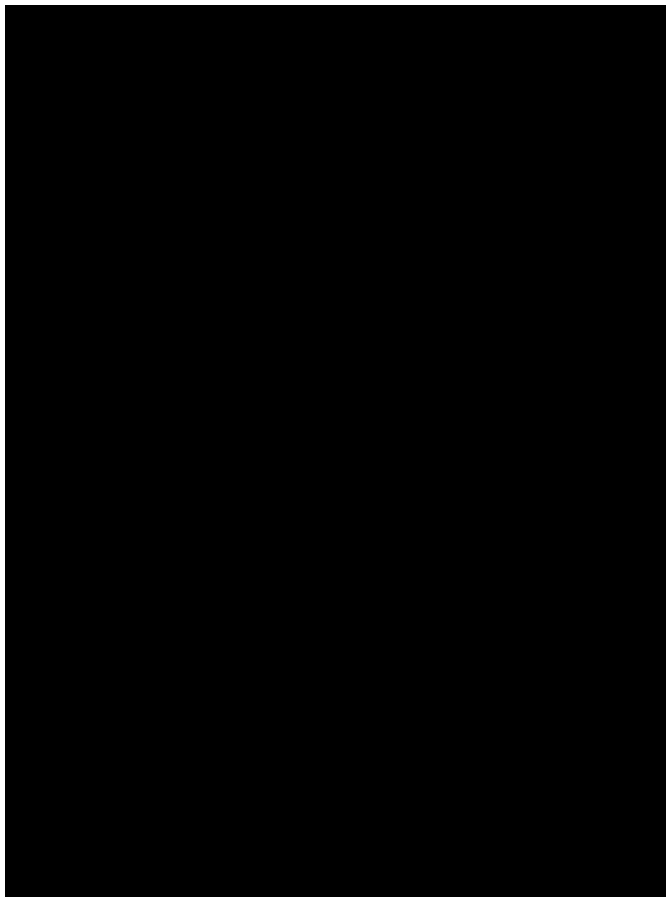
Trees and Ecology

Whilst the application has been supported with the necessary Tree Reports, no consideration has been taken to the trees which lie on the [REDACTED]. Many of these trees are covered by TPO and make a positive contribution to the character of the area and support biodiversity.

There are huge concerns that the RPA of some of the trees will be compromised especially along the southern and eastern boundaries, where some of the proposed housing is shown to be right up to the fence line. It is considered that the proposed development will not comply with Policy DME1 (Protecting Trees and Woodlands), which amongst other

considerations seeks to ensure that; *‘ the visual, botanical and historical value together with the useful and safe life expectancy of tree cover, are important factors in the determining planning applications.’*





Conclusions

The principle of development at this site presents conflicts with the policies stated below and the requirements of the Framework to create high quality, beautiful places which make effective use of land whilst safeguarding and improving the environment.

In summary the application should be refused for the following reasons;

1. The Council has a 6.2 year supply of housing and therefore the loss of land especially outside the settlement boundary is not appropriate and contrary to policies DMH3, DMG2, DS1 and Key Statement 2.
2. Development of this scale would compromise the rural character and appearance, contrary to policy DMG1.
3. The development would create an unbalanced housing type, not fulfilling requirements set out the NPPF and the Council's own policies of creating an *appropriate mix of housing types for the local community.* Furthermore, the evidence supplied for measuring 'housing need' is misleading.

4. The development would create an urbanising feature encroaching into the open countryside on a parcel of land which creates a natural break between Whalley and Barrow.

5. The proposals will conflict with Policy DMG1 by virtue of a direct, unsympathetic and overbearing impact of the proposed development on the residential amenities enjoyed [REDACTED]

6. The proposals will result in the unnecessary loss of mature trees which offer value to character and biodiversity of the area. There are also concerns about the impact of trees on the adjacent land which have not been taken account of in the proposed layout.

7. Increasing pressure on the social infrastructure, which is already at capacity, including health, schools and roads.

Yours sincerely

[REDACTED]