

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 28 August 2025 13:58  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2025/0588 FS-Case-744570460

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Planning Application Reference No.:** 3/2025/0588

**Address of Development:** Land east of Clitheroe Road ,Whalley

**Comments:** I strongly object to this planning application.

There has already been too much development in this area, hundreds of new homes. We are losing our identity as a village.

The type of property being proposed above is not for local people it is for people outside the area.

The infrastructure of Whalley does not support any further development, it is virtually impossible to cross the road safely in Whalley at certain times of the day, very scary as [REDACTED] resident. Also doctors services are difficult to access now with the increased population.

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 27 August 2025 10:31  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2025/0588 FS-Case-744146995

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Planning Application Reference No.:** 3/2025/0588

**Address of Development:** Clitheroe Road, Whalley

**Comments:** The proposed 77-dwelling development is unsustainable, disproportionate, and in direct conflict with the Ribble Valley Core Strategy and the NPPF. It lies outside the settlement boundary on unallocated land, contrary to policies DS1, DMG2 and DMH3. It would erode the vital green gap between Whalley and Barrow, harm the habitats of protected species, whilst upsetting nearby heritage assets and overwhelm already overstretched local infrastructure. The application fails to address well-documented flooding and highways dangers at the A59 underpass, provides incomplete ecological and arboricultural evidence, and omits any heritage assessment. With a demonstrable 6.2-year housing land supply, there is no justification for approving speculative development in this location. The harms — to landscape, wildlife, character, safety, infrastructure, and heritage — substantially outweigh any claimed benefits.

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 27 August 2025 10:32  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2025/0588 FS-Case-744144524

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Planning Application Reference No.:** 3/2025/0588

**Address of Development:** Whalley

**Comments:** I OBJECT to this application for 77 dwellings. Our infrastructure is already at its limit. Schools are fit to bursting, roads are clogged and services like dentists and doctors are becoming inaccessible. [REDACTED], so it's not that I oppose new builds, it's just that the area is now full. If we have more homes we need new schools, doctors, dentist, and improved access.

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 22 August 2025 19:02  
**To:** Planning  
**Subject:** Planning Application Comments - Application 3/2025/0588 FS-Case-743149050

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Planning Application Reference No.:** Application 3/2025/0588

**Address of Development:** LAND EAST OF CLITHEROE ROAD WHALLEY

**Comments:** To whom it may concern:

We as residents totally disagree with the above planning application for the reasons listed below:

Firstly we have NEVER received any correspondence from yourselves earlier in the year relating to this application until now, along with many other residents in the area, leaving inadequate time to process and object, which when it concerns many residents is disgraceful!

We moved into this area for a more rural, calmer, peaceful, greener lifestyle..big mistake sadly the area is already unable to cope with the current residents now living on the new housing estates, the total area is failing there isn't enough Schools, Dr's, Dentists, General Stores it is becoming increasingly frustrating on a daily basis.

We have one 'main' road running through the village to get to either Clitheroe, Blackburn or Accrington which has to deal with all the thoroughfare of traffic this creates major problems especially in the early morning and evening period, also all the roads from the new housing estates filter onto this road if another estate was built the congestion on the road at the point of the proposed site would be catastrophic, the road cannot take any more traffic.

The speed that many vehicles travel at on Clitheroe Road from Barrow into Whalley is currently horrific they treat the road as a race track and moving fast down the road towards Whalley would be extremely dangerous as the proposed site entrance to the estate would not be seen until under the A59 bridge this will cause considerable traffic disruption if not accidents.

We also need to bring your attention to the current problems the residents in Whalley are complaining about regarding the issues with the nightlife, bringing more families with young adults into the area will encourage them to utilise the Clubs and further exacerbate this ongoing problem.

We already have too many 'Government Supported Houses' in the area that are still available for sale why do we need more? too many of the Housing Developers who built the recent estates did not commit to helping infrastructure they used the known loopholes by keeping the number of houses built below strategic numbers therefore not having to financially commit to improve the infrastructure

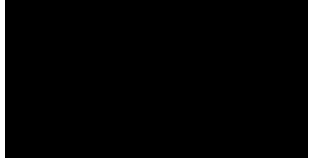
for the area.

As for parking .... there isn't any, it's ridiculous to believe you can build another 77 houses, with potentially 77+ vehicles, also bearing in mind most people have 2 cars, maybe an extra 144 cars where will they park in the village if they had to visit the village to shop? one small car park next to the Co-op is all we have, this could have major implications on the businesses in the village too as people will avoid shopping in the village.

This proposed site is wrong for the area we have had more than our fair share of new builds in an attempt to share some responsibility for providing more housing but enough is enough it can't be allowed to continue it will ruin the whole character of the village we will become one large Housing Estate!

Yours faithfully

A solid black rectangular box used to redact a signature.



22 August 2025

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:

- **Whalley Settlement Boundary**

The site lies outside Whalley's defined settlement boundary and is designated as open countryside. The proposal is therefore in direct conflict with Core Strategy policies DS1, DMG2 and DMH3, which strictly limit residential development in such locations unless exceptional justification is provided. No such justification has been demonstrated. If the developer considers the justification is for affordable houses, they misinterpret the need for affordable homes in Whalley as opposed to the Ribble Valley as a whole. Whalley has already met its requirement for affordable homes, required and provided by the many developments that have been built and are continuing to be built in the village. Therefore, they are confusing local housing need with general housing need in the Ribble Valley that already has 6.2 years supply. Nor has there been any community involvement in this application that might give credence to an unallocated site. It is driven solely by the greed of the developer and land owner. To justify development of this unallocated site, the applicant would need to demonstrate local need which they have singularly failed to do. We already have unoccupied affordable homes in Whalley and Barrow which further undermines the argument for additional affordable homes. There are also other allocated and approved sites, some brownfield within the settlement boundary that are more appropriate to this type of development, having direct access to services. This satellite housing estate has no facilities on its doorstep.

- **Unallocated Land**

The land upon which this development is proposed, is on unallocated land contrary to Core Strategy policies DS1 (Development Strategy) – new housing should be focused on allocated sites in main settlements. This site is not allocated and there is no argument to support development on this site. Approving such a development would set a precedent and open the door for more speculative applications to follow.

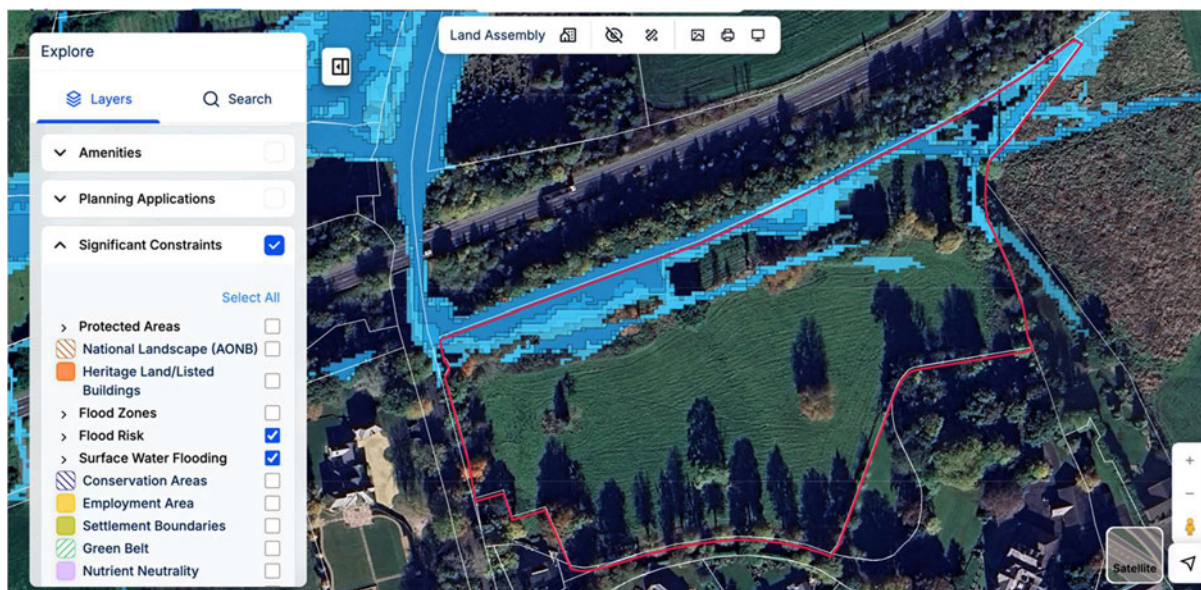
- **Highways**

The proposed access lies immediately after the A59 underpass, and on a blind bend when travelling from Barrow which is dangerous. Clearly LCC Highways agree, as they are proposing, that speed limits will need to be reduced to make the access safe. Coming from Whalley, the scheme that is being suggested, introduces a dedicated right-turn lane which blocks access for residents of Rookwood entering their property. If the road scheme was implemented it turns the rural gateway to the village into an urban road with all the attendant clutter of road signs, speed markings, ghost Islands and 2 pedestrian crossings because there is no pavement fronting the site. All of this just demonstrates that the site is not suitable for the proposed form of development and why it is an unallocated site.

- **Flooding**

The Flood Risk Assessment doesn't adequately address the elephant in the room. This area of Clitheroe Road has flooded on numerous occasions to the extent that the road had to be closed as demonstrated by the attached flood model. The applicant suggests that the flood risk is low and infrequent, this is not born out by the evidence of the Flood Map or our lived experience. The suggestion that the surface water drainage should go to an open ditch on the other side of the road 100m away without any

agreement and involving 3<sup>rd</sup> party land is fanciful. No details have been provided and the proposed drainage solution is certainly not within the red line boundary of this application. Having 77 new homes with the associated hardstanding will do nothing but exacerbate the risk. This is the last thing we need in Whalley especially with its flooding history. This fails to comply with DMG3, DME6 and NPPF paragraphs 111 and 168.4.



- **Ecology**

The Ecological Appraisal identifies 18 trees with potential bat roost features and habitats of moderate value, 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. There are evidently water bodies on this site and there is no mention of the ponds which are frequent features within the area, providing ideal habitat for many protected species, including GC newts and does not meet the requirements of NPPF paragraph 186, Circular 06/2005, or statutory obligations under the Conservation of Habitats and Species Regulations 2019.

- **Local Vernacular**

The northern approach to Whalley is characterised by three substantial, late-19th and early-20th century villas, Bramley Mead, Rookwood and Graythwaite together with The Lodge to Bramley Meade and The Coach House to Graythwaite. They are each set within mature landscaped grounds and form a distinctive historic character for the area that reflects Lancashire's textile history. All of these homes are over 100 years old, and could be considered non-designated heritage assets. The proposal for 77 highly packed dwellings on a satellite estate of apartments and terraced blocks, bears no relation to this established character and will detract from this very special location. The materials proposed do not reflect the surrounding properties which consist of Accrington brick with ornate sandstone detailing, natural slate roofs and white wooden windows. The materials stated are reconstituted stone and render, with tile roofs and grey uPVC windows. This would appear incongruous and harmful to the setting of these historic homes, eroding the verdant, low-density gateway to the village. This conflicts with policies DMG1 and DME2 and with NPPF paragraph 135, which requires development to respect local character and history.

The site also lies on the approach to Whalley Conservation Area. The Lodge, and Rookwood have both undergone significant Heritage and Conservation scrutiny during recent renovations. In contrast, this application which also has the same setting makes no assessment of the impact on the Conservation Area. The omission of a Heritage Impact Assessment is a significant failing, contrary to policy DME4 and NPPF paragraphs 203–206.

There are many fundamental flaws to this application, drainage and flooding in my view should be fatal to this application and I would respectfully request that it is refused.

Kind regards,

██████████

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 27 August 2025 14:51  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2025/0587 FS-Case-744263595

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

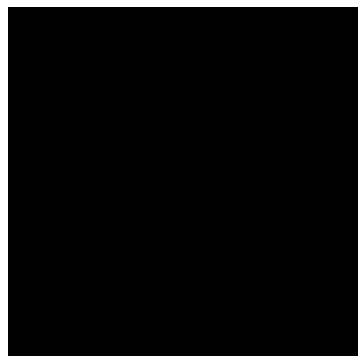
**Planning Application Reference No.:** 3/2025/0587

**Address of Development:** Land east of clitheroe road whalley

**Comments:** Wed like to object to the application put in by pringle homes to build 77 affordable rented flats and houses this is greenfield land .its on a flood plain . The houses in that area are so nice and we dont want just anybody from anywhere moving into our well kept village extra noise ,extra traffic . We feel these properties would be better built elsewhere so we oppose the application on these grounds thanks yours sincerely [REDACTED]



Re-Planning Application  
No. 3/2025/0588  
Ribble Valley Borough Council



25<sup>th</sup> August, 2025

## LETTER OF OBJECTION

### Introductory Comments-

[REDACTED] south and the majority of the east of this site. We write to object to the grant of planning permission with regards to Planning Application 3/2025/0588, land east of Clitheroe Road, Whalley (Applicant Pringle Homes).

The following are some of the reasons why Planning Permission should not be granted to this proposed development.

### Outside settlement Boundary-

Quite simply the land in question is outside the settlement boundary of the village. Settlement boundaries should be central to assessing planning applications by stopping new developments spreading into the surrounding countryside and ruining the character of the area and preventing urban sprawl.

[REDACTED]  
This considerable development of 77 homes will cause a [REDACTED]  
[REDACTED] the 77 proposed properties [REDACTED] This will severely impact upon our privacy.

The development will impact on our ability to enjoy our home and garden due to factors like increased noise, smell, loss of privacy, or other disturbances due to 77 homes suddenly appearing [REDACTED]  
[REDACTED].

the proposed development, the light from the development would certainly be an issue

#### Proximity to protected trees within our boundary-

The tree impact assessment seems to fail to identify the fact that all the trees along the southern and eastern boundaries of the proposed site are subject to tree preservation orders and the proposed layout will interfere with the route systems of the trees along those boundaries.

#### Wildlife and Agricultural Land-

“We need to protect the open countryside, valued for its environmental benefits, biodiversity and scenic character”. (The Ribble Valley Core Statement).

The land in question is agricultural land, that is regularly cropped and grazed.



There is much wildlife in the field, we regularly see deer (I have seen them twice just this last week -below), foxes, buzzards nesting in a tree and there are many bats, the development site.



Obviously, if passed, the development would lead to the destruction of their natural habitat. Additionally eroding even more of the limited green countryside we have left in the Whalley area.

### Impact on the character and appearance of the area-

The design/style of this development visually clashes completely with the surrounding area. This substantial development of 77 houses containing one-bedroom flats and 151 parking spaces etc... does in no way align with the surroundings and or houses in close proximity. The bulk and overdeveloped nature is aesthetically completely at odds with surrounding landscape/area, resulting in no visual coherence. It is potentially an intensely overdeveloped piece of land incompatible with the surroundings of larger, period properties, some of which are historical in nature. It is thus detrimental to the character/appearance of the area.

### Housing need and supply-

Pringle Homes are proposing to bypass the planning principle of Settlement Boundaries by highlighting the local need for affordable housing. Whilst there is a need for local affordable housing it is not to the extent that Pringle Homes are stating.

Indeed, the RVBC commissioned [REDACTED] Consulting to provide a new Affordable Housing Needs Assessment for The Ribble Valley, which follows the approach set out by the National Planning policy Framework and supporting Planning and Practice Guidance and uses the latest data available from The Office of National Statistics. This report dated 5<sup>th</sup> June 2025 “updates the previous evidence on affordable need” and states “... this evidence will support any negotiations for affordable housing delivery on future planning applications”.

<b>Estimated level of Affordable Housing Need by sub-area (per annum)</b>						
	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
<b>TOTAL</b>	<b>95</b>	<b>194</b>	<b>34</b>	<b>323</b>	<b>93</b>	<b>230</b>

Quite clearly the Net need of affordable housing per annum in Whalley is identified as 13. Quite shockingly the planning application refers to this study but states (repeatedly)that the gross need is 30, this is simply not true.

The Application discusses and puts emphasis of need as highlighted through Local Waiting Lists. However, Section 6.10 of the planning application itself states that a Planning Officer

pointed out that these can be over inflated due to limited screening for Local Connection, I was already of this opinion. Thus, suggesting that waiting lists in reality carry limited weight with relation to real local housing need. Indeed, anyone can apply to go on the housing waiting list. Hence the above housing needs assessment would be much more accurate than the figures put forward in the application.

I have not been able to see the figures for affordable housing within the new developments (currently in the process of being built or waiting to be built) but with regards to required percentages of affordable housing in new developments, these will obviously be addressing the affordable housing needs.

The 5-year housing Supply Document (published May 2025) states that based on the 2023 Housing Delivery Test (between 2020-2023) that the Ribble Valley delivered 425% of the required homes over the previous three years. It then identified that when assessing the 5-year housing supply from the end of March, that we actually have a housing supply for 6.2 years (this includes a 5% buffer). In other words, we have more than enough houses already.

Also, Ribble Valley Borough Council states that affordable housing should be incorporated into developments. They should not BE the development. This seems quite backward thinking as it is harking back to the “affordable housing estates” of the 1960’s and 1970’s and segregating part of the community.

Completely in conflict with the Core Strategy of The Ribble Valley Borough Council that states-  
“Neighbourhoods in the Ribble Valley will be sought after by building cohesive communities”

#### Negative impact on local amenities and infrastructure-

The local GP surgery is massively under pressure, I am currently waiting for a GP appointment, which is in one month’s time. I have had to take [REDACTED] to a local urgent care department, with medical needs that should have been easily dealt with at the Surgery. This situation will only get worse when the houses with full planning permission are built, houses in the process of being built are completed, and houses currently on the market are sold!

Similarly, The Dentists and local primary Schools are under extreme pressure too. In relation to schools the Council may accept money to waver opposition to planning but in this does not avoid the negative impact of local children having to “fight” for a place at their local school.

The current situation heavily contradicts The Core Strategy objective that-

“whilst affordable housing is a need – high quality services which meet the needs of the Borough communities and support their health, social and cultural wellbeing will be protected and enhanced”.

(Interestingly the planning proposal keeps referring to Oakhill School and Nursery as close by School provision. Oakhill is a fee-paying school, not something associated with social housing. In fact, much of the application is completely misleading and not completed with a real awareness of the local community and its needs. Similarly private gyms are mentioned in a nonsense attempt to make the development seem suited to the area.)

### Road Safety and Traffic Congestion-

██████████ chooses to leave home ██████████  
██████████ in Whalley every single day to avoid crossing ██████████  
Road, due to safety concerns. At this time the road is very busy, with many cars ignoring the speed limit. It is not a safe part of the road for ██████████ to cross as cars appear very quickly around the bend. There is not even a public footpath on this side of the road.

Adding another potential 150 cars to the situation is going to make this situation considerably worse. Adding a junction here would create more congestion, hinder vision, in other words make this area of road more susceptible to accidents.

The National Planning Framework (para 116) states the development

“should...be prevented/refused on highways grounds if there would be an unacceptable impact on highway safety.... or other residual impacts on other road networks would be severe”

I put it to the Council that this is the case and waiting for an accident to happen, risks which would inevitably be exacerbated if planning permission was granted.

Also driving through Barrow, past the school, in the morning and afternoon is perilous. The sheer number of cars and pedestrians crossing what is a very busy road can only be further exacerbated by the introduction of yet even more cars and pedestrians to what is already unsafe.

Unfortunately, the alternative route into Clitheroe is via Wiswell Lane onto the A671. This can at times be almost impossible to exit due to congestion owing to sheer number of households using local roads. ██████████ on this stretch of road ██████████ ago, the heavy usage of this road has got much worse since then. The local road networks are massively under pressure. Quite simply the local road networks cannot cope with the huge influx of housing in the area.

Also, the area of Clitheroe Road where the proposed development traffic is to enter and exit floods terribly, this I know from personal experience. The reports provided minimised any flooding risk, which is just not true if you have lived in the area.

### Anti-social Behaviour and Crime-

There has been much well publicised (the BBC news website, The Guardian and many more) “trouble” in Whalley over recent months and years, including drug problems, anti-social behaviour etc... (I regularly witness anti-social behaviour myself). Local Services and the Police etc... are obviously struggling to contain drug issues/anti-social behaviour despite many attempts to do so. Adding more homes to the village is just going to add to the deteriorating situation. I worry that in years to come people will look back and wonder why/how the Ribble Valley has become completely unrecognisable.

### To Conclude-

The Core Strategy states that whilst new developments are to meet the needs of the area for growth “services and quality of life will be managed to ensure the special characteristics of the area are preserved for future generations”

Whalley is already losing its identity as a village. This planning application prioritises the affordable/social housing issue at the cost of all other recognised valid planning issues and the very real needs and experiences of the residents of Whalley. It seems a blatant attempt to shoehorn a completely inappropriate development onto a completely inappropriate site.

This is a very large development of 77 homes and it would be naïve (even reckless) to underestimate the significant impact on a community/infrastructure that is failing to cope. There are many valid reasons this development should not be granted planning permission.

We are addressing the local housing needs with the many houses that already in the building “pipeline”. Whalley is a beautiful part of the Ribble Valley. Enough is enough.

Yours Sincerely,

[Redacted Signature]

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 28 August 2025 11:06  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2025/0588 FS-Case-744504114

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **Reference No.:** 3/2025/0588

**Address of Development:** Land east of Clithereo Road, Whalley

**Comments:** Object

[REDACTED]

19.8.25

Dear Sirs, 28 AUG 2025

I wish to register my objection to the proposed development on land east of Clitheroe Rd. Whalley. (3/2025/0588)

Whalley and Baxow have built more than enough houses/flats over recent years. The area cannot absorb any more developments. Transport and traffic problems are already an issue & parking is near impossible. The local services are already at saturation point and are not coping well. To add 17 highly occupied dwellings can not be an asset to the area. The wildlife in this area is precious to us all, and will be damaged. I feel this development is very detrimental in many ways to Whalley.

Yours faithfully  
[REDACTED]





26 AUG 2025

25 August 2025

Dear Sir,

**Re: Planning Application No: 3/2025/0588**

**Grid Ref: 373616 437093**

**Proposal: Proposed erection of 77 no. affordable dwellings with associated access, gardens, parking and landscaped areas.**

**Location: Land East of Clitheroe Road, South of A59, North of Bramley Meade's driveway, Whalley**

Having perused the above planning application, I have included below my reasons for my objection to the planning application.

**1. No local housing need:**

The proposed development is not needed as Ribble Valley Borough Council ("RVBC") have already met their 5 year housing supply. The proposed development is not an RVBC allocated site. The latest Ribble Valley Borough Council 5 year housing land supply report as at 31 March 2025 published May 2025 demonstrates that RVBC can show a 6.2 year supply which is therefore an expected over supply of housing.

**2. Proposed development in open countryside not justified:**

Core Strategy policy DMH3 (Dwellings in the open countryside and AONB) requires that development be limited to development essential to the purposes of agriculture or residential development which meets an identified local need. The application fails to demonstrate that it complies with this policy.

**3. Unacceptable traffic impact:**

The proposed development includes 151 car parking spaces. This would result in a significant increase in vehicle movements within the local area which would also be contrary to Core Strategy policy DMG1 which requires that proposals not adversely affect the amenities of the surrounding area, ensure safe access to accommodate the scale and type of traffic likely to be generated.

**4. Proposed development inadequately addresses flood risk:**

- a. The proposed development is not compliant with Core Strategy policy DME6 (Water Management) which requires that proposals should not exacerbate flooding elsewhere and should include details for surface water drainage and means of disposal based on sustainable drainage principles. It is noted that the use of the public sewerage system is the least sustainable form of surface water drainage.

- b. The Application Form also states that surface water will be disposed of via the main sewer. However, it is noted that the FRA states at paragraph 4.3 that *"There are no public sewers local to the site."* The use of Sustainable Drainage Systems is not adequately considered in favour of using the least sustainable form of surface water drainage (the main sewer) contrary to Core Strategy policy DME6.

**5. Unassessed impact on local amenity:**

The siting of the proposed development seeks to place the accommodation most densely towards the south of the site, closest to existing residential development. This will have an adverse impact on the privacy and security of the existing dwellings contrary to Core Strategy policy DMG1. The safety of existing and future residents and potential incidence of antisocial behaviour has not been adequately considered.

**6. Biodiversity and environmental requirements unmet:**

Core Strategy policy DME1 states that there is a *"presumption against clearance of broad-leaved woodland for development purposes. The Council will seek to ensure that woodland management safe guards the structural integrity and visual amenity value of woodland, enhances biodiversity and provides environmental health benefits for the residents of the borough."* The felling of trees as set out in the application should therefore be resisted, especially given the inappropriate design, density and siting of the proposals which result in over-development of the site inappropriate in the context of the local area and local character.

**7. Loss of agricultural land:**

The site is classified as grade 3 agricultural land (although no subcategory is assigned to the site so we are unable to establish whether it is grade 3a or grade 3b). The NPPF paragraph 174b seeks to protect best and most versatile land ("**BMV**") land from development. BMV land is defined as including land graded 1, 2 and 3a. The application therefore does not demonstrate that BMV is not going to be lost as a result of the development. BMV is vital for ensuring food security for the UK and local planning authorities should prioritise development on poorer quality land before BMV.

I believe the above points highlight my reasons for objection to the above planning application; I trust that you will make your decision in the best interests of the residents of the Ribble Valley.

Yours sincerely,





26 AUG 2025

25 August 2025

Dear Sir,

**Re: Planning Application No: 3/2025/0588**

**Grid Ref: 373616 437093**

**Proposal: Proposed erection of 77 no. affordable dwellings with associated access, gardens, parking and landscaped areas.**

**Location: Land East of Clitheroe Road, South of A59, North of Bramley Meade's driveway, Whalley**

Having perused the above planning application, I have included below my reasons for my objection to the planning application.

**1. No local housing need:**

The proposed development is not needed as Ribble Valley Borough Council ("RVBC") have already met their 5 year housing supply. The proposed development is not an RVBC allocated site. The latest Ribble Valley Borough Council 5 year housing land supply report as at 31 March 2025 published May 2025 demonstrates that RVBC can show a 6.2 year supply which is therefore an expected over supply of housing.

**2. Proposed development in open countryside not justified:**

Core Strategy policy DMH3 (Dwellings in the open countryside and AONB) requires that development be limited to development essential to the purposes of agriculture or residential development which meets an identified local need. The application fails to demonstrate that it complies with this policy.

**3. Unacceptable traffic impact:**

The proposed development includes 151 car parking spaces. This would result in a significant increase in vehicle movements within the local area which would also be contrary to Core Strategy policy DMG1 which requires that proposals not adversely affect the amenities of the surrounding area, ensure safe access to accommodate the scale and type of traffic likely to be generated.

**4. Proposed development inadequately addresses flood risk:**

- a. The proposed development is not compliant with Core Strategy policy DME6 (Water Management) which requires that proposals should not exacerbate flooding elsewhere and should include details for surface water drainage and means of disposal based on sustainable drainage principles. It is noted that the use of the public sewerage system is the least sustainable form of surface water drainage.

- b. The Application Form also states that surface water will be disposed of via the main sewer. However, it is noted that the FRA states at paragraph 4.3 that *"There are no public sewers local to the site."* The use of Sustainable Drainage Systems is not adequately considered in favour of using the least sustainable form of surface water drainage (the main sewer) contrary to Core Strategy policy DME6.

**5. Unassessed impact on local amenity:**

The siting of the proposed development seeks to place the accommodation most densely towards the south of the site, closest to existing residential development. This will have an adverse impact on the privacy and security of the existing dwellings contrary to Core Strategy policy DMG1. The safety of existing and future residents and potential incidence of antisocial behaviour has not been adequately considered.

**6. Biodiversity and environmental requirements unmet:**

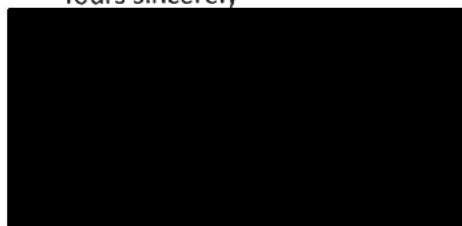
Core Strategy policy DME1 states that there is a *"presumption against clearance of broad-leaved woodland for development purposes. The Council will seek to ensure that woodland management safe guards the structural integrity and visual amenity value of woodland, enhances biodiversity and provides environmental health benefits for the residents of the borough."* The felling of trees as set out in the application should therefore be resisted, especially given the inappropriate design, density and siting of the proposals which result in over-development of the site inappropriate in the context of the local area and local character.

**7. Loss of agricultural land:**

The site is classified as grade 3 agricultural land (although no subcategory is assigned to the site so we are unable to establish whether it is grade 3a or grade 3b). The NPPF paragraph 174b seeks to protect best and most versatile land ("**BMV**") land from development. BMV land is defined as including land graded 1, 2 and 3a. The application therefore does not demonstrate that BMV is not going to be lost as a result of the development. BMV is vital for ensuring food security for the UK and local planning authorities should prioritise development on poorer quality land before BMV.

I believe the above points highlight my reasons for objection to the above planning application; I trust that you will make your decision in the best interests of the residents of the Ribble Valley.

Yours sincerely



26 AUG 2025

18 August 2025

Dear Sir,

**Re: Planning Application No: 3/2025/0588**

**Grid Ref: 373616 437093**

**Proposal: Proposed erection of 77 no. affordable dwellings with associated access, gardens, parking and landscaped areas.**

**Location: Land East of Clitheroe Road, South of A59, North of Bramley Meade's driveway, Whalley**

Having perused the above planning application, I have included below my reasons for my objection to the planning application.

**1. No local housing need:**

- a. The proposed development is not needed as Ribble Valley Borough Council ("RVBC") have already met their 5 year housing supply. The proposed development is not an RVBC allocated site. The latest Ribble Valley Borough Council 5 year housing land supply report as at 31 March 2025 published May 2025 demonstrates that RVBC can show a 6.2 year supply which is therefore an expected over supply of housing.

**2. Proposed development in open countryside not justified:**

- a. The proposed development is located within open countryside as acknowledged at paragraph 2.29 of the planning statement prepared by [REDACTED] [REDACTED] dated July 2025 (the "Planning Statement").
- b. Ribble Valley Borough Council Core Strategy 2008 – 2028 Adopted December 2014 ("Core Strategy") policy DMG2 requires that development within open countryside *"will be required to be in keeping with the character of the landscape and acknowledge the special qualities of the area by the virtue of its size, design, use of materials, landscaping and siting. Where possible new development should be accommodated through the re-use of existing buildings, which in most cases is more appropriate than new build."*
- c. The proposed development is contrary to Core Strategy policy DMG2 (Strategic Considerations), policy DMGH3 (Dwellings in the Open Countryside and AONB) and policy DMG1 (General Considerations) as it represents a significant overdevelopment of the site which is inappropriate in size, density and scale. The siting of the proposed development has a negative impact on the existing landscape and is over dominant. The proposed development also comprises new build development and does not make use of existing buildings. The proposed development is not needed to

address a local need as already stated above in relation to RVBC's expected oversupply of housing.

- d. Core Strategy policy DMH3 (Dwellings in the open countryside and AONB) requires that development be limited to development essential to the purposes of agriculture or residential development which meets an identified local need. The application fails to demonstrate that it complies with this policy.

### 3. Affordable housing requirements not met:

- a. The application does not demonstrate that the proposed development complies with Core Strategy policy DMH1 (Affordable Housing) which requires that residential development must be expressly for certain groups of people, such as older people currently resident in the parish and first time buyers currently in the parish. Provision for older people is a priority for the council with 15% of units needing to be allocated for older people. The application provides no details on how it achieves the requirements of policy DMH1.
- b. Policy DMH1 also requires the proposed development to comply with DMG1, which as discussed above has not been complied with.

### 4. Proposed development not sustainably located:

- a. The proposed development is contrary to Core Strategy policy DMG3 (Transport and Mobility) which requires the local planning authority attach **considerable weight** to:  
*"The availability and adequacy of public transport and associated infrastructure to serve those moving to and from the development – [...]"*  
*2. The provision made for access to the development by pedestrian, cyclists and those with reduced mobility.*  
*3. Proposals which promote development within existing developed areas or extensions to them at locations which are highly accessible by means other than the private car. [...]"*  
*6. Proposals which locate development in areas which maintain and improve choice for people to walk, cycle or catch public transport rather than drive between homes and facilities they need to visit regularly."*
- b. Paragraph 2.7 of the Planning Statement states that *"In terms of sustainability and reducing reliance on the private car, the site is well connected to Whalley lying c800m north of the centre of the village."* However, this statement contradicts the transport assessment prepared by [REDACTED] dated July 2025 (the **"Transport Assessment"**) which demonstrates that Whalley village centre is 950m away not 800m at table 5.2.
- c. At paragraph 5.2.1 the Transport Assessment sets out the guideline walking distances provided in the Chartered Institution of Highways document which at table 5.1 states that the desirable walking distance is 200m. 950m is significantly more than the desirable walking distance of 200m. 950m is also significantly further than the acceptable walking distance of 400m and the preferred maximum distance of 800m.
- d. The proposed development therefore does not demonstrate that it is within the recommended maximum walking distance to a town centre. As such, it is likely that

residents would be reliant on a private car contrary to policy DMG3. The site is not located within an area that is well connected to public transport.

**5. Unacceptable traffic impact:**

- a. The proposed development includes 151 car parking spaces. This would result in a significant increase in vehicle movements within the local area.
- b. The framework travel plan prepared by [REDACTED] dated 16 July 2025 ("FTP") states that the 'Ribble Valley 007' Middle Super Output Area (MSOA) shows that 87% of people travel by car to get to work and that only 1% travel by cycle and 1% by train. Although it is noted that the census used is from 2011 – over a decade ago, it casts significant doubt on the application's assertion that the proposed development would only result in 44 two-way trips in the morning peak and 41 two-way trips during the evening peak period in respect of a scheme with 151 car parking spaces.
- c. The proposed development would result in a significant increase in traffic movements which would have a significant negative impact on the local area which would also be contrary to Core Strategy policy DMG1 which requires that proposals not adversely affect the amenities of the surrounding area, ensure safe access to accommodate the scale and type of traffic likely to be generated.

**6. Unacceptable health impacts on future residents:**

- a. The road traffic noise assessment prepared by [REDACTED] dated 17 July 2025 ("Noise Assessment") conclude that the noise measurements place the site within the medium risk category for both daytime and nighttime noise. This is simply an inappropriate location for development given the proximity to such noisy roads.
- b. The impact of emissions and the quality of the air in respect has not been appropriately assessed within the application, contrary to Core Strategy policy DMG1 which requires that developers consider air quality and mitigate adverse impacts where possible.

**7. Proposed development inadequately addresses flood risk:**

- a. The proposed development is not compliant with Core Strategy policy DME6 (Water Management) which requires that proposals should not exacerbate flooding elsewhere and should include details for surface water drainage and means of disposal based on sustainable drainage principles. It is noted that the use of the public sewerage system is the least sustainable form of surface water drainage.
- b. The flood risk assessment and drainage strategy prepared by [REDACTED] dated July 2025 ("FRA") states at paragraph (emphasis added):  
5.11 *"The Environment Agency Risk of Flooding from Surface Water map indicates a very low risk to the site from **surface water flooding except along the site's northern boundary where there is a high risk**"* and paragraph 5.16 *"The introduction of the development will increase the area of impermeable hardstanding on site and therefore has the **potential to alter the surface water runoff regime of the site and to have an adverse effect on flood risk elsewhere in the wider catchment.**"*

- c. The application form dated 25 July 2025 ("**Application Form**") contradicts the above statement in the FRA as it states that the proposal will not increase flood risk elsewhere – which is misleading.
- d. The Application Form also states that surface water will be disposed of via the main sewer. However, it is noted that the FRA states at paragraph 4.3 that "*There are no public sewers local to the site.*" The use of SuDs is not adequately considered in favour of using the least sustainable form of surface water drainage (the main sewer) contrary to Core Strategy policy DME6.

**8. Unassessed impact on local amenity:**

- a. Core Strategy policy DMG1 requires that the application consider the potential impact on social infrastructure provision. The Planning Statement at paragraph 2.19 notes that a recent planning application in Whalley (ref. 3/2022/1158) was refused and that it had been noted that there was considered to be a deficit in primary school places. The application does not address whether there are sufficient primary school and secondary school places to accommodate the proposed development.
- b. The application also does not address whether other local services, such as GPs would be able to accommodate the additional occupants of the proposed development. This is of particular concern given that affordable housing Core Strategy policy DMH1 requires a significant percentage of the properties to be allocated to older persons.
- c. The siting of the proposed development seeks to place the accommodation most densely towards the south of the site, closest to existing residential development. This will have an adverse impact on the privacy and security of the existing dwellings contrary to Core Strategy policy DMG1. The safety of existing and future residents and potential incidence of antisocial behaviour has not been adequately considered.

**9. Biodiversity and environmental requirements unmet:**

- a. The Planning Statement confirms that the proposed development will only result in a 3.80% biodiversity net gain on-site which falls well below the required 10% increase required by statute and policy. The proposal therefore does not prioritise local habitats or ecology and instead seeks to over develop the site.
- b. The proposed development is contrary to Core Strategy policies DME1, DME3, DMG1 and paragraph 192 of the National Planning Policy Framework (2024) ("**NPPF**").
- c. The Application Form states that the proposal is not near protected or priority species or near to any designated sites, important habitats or other biodiversity features. This is incorrect and misleading as the ecological survey and assessment prepared by [REDACTED] dated August 2025 ("**Ecological Assessment**") states at 3.1.2 that "*The site lies within a Site of Special Scientific Interest (SSSI) Impact Risk Zone for Light Clough SSSI located 1.45 kilometres to the north-east of the site and is designated for its geological importance.*"
- d. The Ecological Assessment also reveals that there are ten non-statutory designated sites for nature conservation within 2km of the site and that the site's "*mature and semi-mature trees and the woodland habitats are considered to be of 'local' importance*".





- b. However, the Planning Statement had been uploaded onto the planning portal for the application on 14 August 2025. To comply with national consultation requirements, the consultation period for the application should not be counted as

having begun prior to 14 August 2025 given the Planning Statement was not available to the public for review.

I believe the above points highlight my reasons for objection to the above planning application; I trust that you will make your decision in the best interests of the residents of the Ribble Valley.

Yours sincerely,

