

Our Ref: [REDACTED]

20 November 2025

Mr S Kilmartin
Planning
Ribble Valley Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

via email

Dear Mr Kilmartin

**Objection to planning permission Ref. 3/2025/0845
Demolition of Offices and Replacement Office Building
The Village Hall, Franklin Hill, Brockhall Village, Old Langho**

[REDACTED] is instructed by [REDACTED] to object to planning application Ref. 3/2025/0845 by Prometheus Group Service Ltd. The application relates to the former village hall on Franklin Hill Brockhall Village and proposes:

"Demolition of the existing offices and construction of replacement office building".

[REDACTED] to the application site.

Introduction

The application site is in the centre of Brockhall Village in Old Langho. Brockhall Village is a largely residential area and whilst it comprises some non-residential development, other than the application site and Brockhall Nursery, this is all located at the entrance to the village where there is a coffee shop, gym, hotel and a small office building. Indeed, the only reason there is an office on this site is due to the conversion of the former village hall, which had sat vacant for a number of years.

For reasons that we will explain in these representations, whilst the current use of the site is considered broadly acceptable given its scale and the history of the site, the construction of a new two and half storey office building, particularly one of the scale proposed, is not acceptable nor is it appropriate for its location being entirely out of keeping with the character of the area.

It is also respectfully suggested that the design and layout of the building indicates a very clear intention to secure consent for one use (offices) and latterly convert it to another use (residential). As officers will be aware, office development benefits from permitted rights under Schedule 2, Part 3, Class MA, of the Town and Country Planning (General Permitted Development) (England) Order 2015 to convert to residential development.

Our client [REDACTED]
[REDACTED] consider the use inappropriate and unacceptable for a residential area.

Planning History

The site has a lengthy and detailed planning history, all of which is directly relevant to this application. This is summarised below:

- 3/2024/ 0819 – *Certificate of lawfulness for proposed 1m fence and new entrance gates at vehicular access. Approved.*
- 3/2024/0635 - *Certificate of Lawfulness for proposed 1m high fencing and new entrance gates at vehicular access. Approved at appeal.*

This is relevant by way of context as it is considered a clear attempt by the applicant to create one planning unit out of the former village hall land and adjacent public open space. A 1 metre high fence around the site serves no security purpose and therefore it is difficult to see why it would be necessary other than as a means define and delineate the plot.

- 3/2022/0725 – *Proposed demolition of existing building and replacement with new dwelling. Refused.*

Within this submission the applicant sets out how and why the current site is not appropriate for an office and their business operation and why they need to redevelop it for a house. The following comments within the supporting statement accompanying the planning application are pertinent and material to the current application:

1. *"Deliveries into a mainly residential area are not ideal. The deliveries are on top of vehicular movements to and off site from employees, suppliers, customers, post and refuse collections" (Para 3.2).*
 2. *"The current site, being placed in the middle of a quiet residential area, is unsuitable for the development they are seeking. Their move and corresponding growth is contingent on theme being able to develop the vacated Brockhall land by constructing a new, larger home for themselves" (para 3.3).*
 3. *"As the business expands, the applicants are even more keen to move to a more corporate location within the borough.... They need an improved site, in a location that is more oriented towards commercial activities " (para 3.4).*
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4. "At present, the company uses yard space at Fairfield Business Park and Mrs Dowson's Farm, Hawkshaw Fold, Longsight Road, Blackburn, BB2 7JA. However, there is no long-term security, which is necessary as they expand their business. They also want to be located in one place to increase efficiency, ensure the entire site is secure and to reduce the number of vehicular movements as there will be no movements between multiple sites. It is not possible to move all operations to the Brockhall's location, being a predominantly residential area (Para 3.7)
5. "Outline planning permission was granted in January 2012, with all matters reserved, for the proposed demolition of the existing building and replacement with 1 no. detached house (reference 3/2011/0930). Within the planning application, a supporting letter was submitted in November 2011. It stated the office building was marketed in October 2010 at a price of £245,000 and although four viewings were undertaken, no suitable written offers came forward at an acceptable level. The general feeling from the owners was that commercial uses in this location were marginal because of a lack of passing traffic and the fact that it was a single stand alone property (Para 4.5)..
6. "The building will soon become vacant as the applicant needs to relocate their business elsewhere. Further explanation of this need has been given in section 3 above. If the proposed redevelopment of the site for one dwelling is not accepted, the applicant's business will still need to move, however it will be more costly for them and it would leave a building vacant in the village, with potential for anti-social behaviour
7. The applicant has used the office for a number of years, however it has been explained that they had special circumstances with them living in the village and needing a set up quickly, but temporarily (Para 5.11)

It is noteworthy that planning permission was refused for this scheme for four reasons, including that the development would result in the loss of public open space and an additional dwelling would perpetuate an already unsustainable pattern of development without justification.

- 3/2011/0930 – Proposed Demolition of the existing building and replacement with 1 no. detached house. Approved

Although outline planning permission has previously been granted to redevelop the former village hall for a dwelling this was under an entirely different planning policy context and at a time when the Council had a shortage of housing and the absence of a 5 year supply of land for housing. This application should not therefore be viewed as setting a precedent for development on the site.

- 9/2010/0544 – Proposed change of use from D2 (Village Hall) to B1 (office). Approved

Planning permission was granted for the change of use to office due to issues with the use of the premises as a village hall as originally intended and because the building was laying vacant. Approved.

- 9/2010/0545 – Proposed change of use from D2 (Village Hall) to A1 (Retail). Approved.

This planning permission was never implemented as the village hall was converted to an office.

Insofar as this application is concerned the site's planning history (including the adjacent public open space) is hugely relevant and a material planning consideration to which significant weight should be given in the determination of this application. In particular it shows:

1. A strong and persistent desire to develop the application site and adjoining land for residential development.
2. A clear intent to try and establish the application site and adjacent public open space as a single planning unit thereby improving its redevelopment potential.
3. A lack of consistency with regards the suitability of the site and Brockhall Village for office accommodation. Much was made in application ref. 3/2022/0725 of the unsuitability of the site for office accommodation. This raises serious questions about the need for this development and the applicants' true intentions, particularly having regard to the external appearance of the building and the opportunity afforded by permitted development rights.

Designations

On the Proposals Map accompanying the adopted Development Plan the application site is identified as laying within the defined settlement of Brockhall Village, which is a Tier 2 Village Settlement. It is also considered that part of the application site between the existing gravel car park and southern boundary (which should be clearly defined on the site layout plan for the avoidance of any doubt) is designated public open space.

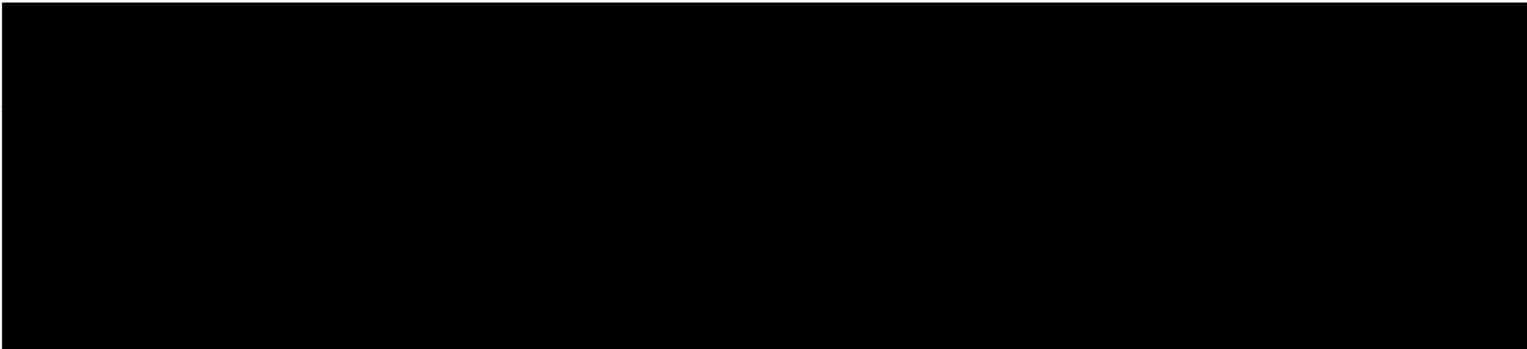
The open land to the south of the application site, which is a separate planning unit, is also designated public open space.

The Scheme

The application proposes the demolition of the former village hall now an office and the construction of a new two and half storey office building with a floor area of 622 sq. m. Whilst not explicit in the description of development, the proposal also includes alterations to means of access to the site and the creation of a new car park.

It is of concern that the description of development is not clear and therefore it is respectfully requested that the applicant is required to amend the description of development to make clear the full scope of the scheme. The description of development should make clear the use class of development (namely office Class E (i)); the scale of development (2 and half storeys); and that approval is sought for alterations to means of access and the construction of a new car park.

No details are provided of the proposed boundary treatment and given recent enforcement issues and an apparent encroachment into designated public open space, it is respectfully requested that the applicant is required to confirm this on the proposed site layout plan.



It is also clear from the plans and on site that the applicant is seeking to create and establish one planning unit out of the application site and adjoining public open space. Whilst the site location plan shows the extent of the application site via a red line, this is not detailed on the existing and proposed site layout plan. Indeed, we are not convinced that the extent of the proposed development site can be fully accommodated with the red line as shown on the submitted site location plan and that it may in fact be slightly bigger.

Given the history of this site, the applicant should therefore be required to add the red edge to both the existing and proposed site plans to ensure that the proposed development can indeed be fully accommodated within the application site boundary. The applicant should also be required to define the southern boundary of the site with the open land designated/ public open space to ensure no encroachment of development into this area. This will provide absolute clarity with regards the planning unit and avoid future doubt.

With regards the external appearance of the development, this does not have the appearance of an office building, but rather a residential dwelling / small apartment block. Modern office blocks are almost always designed with large areas of glazing and a regular window pattern to ensure maximum daylight. Indeed, the applicant has previously claimed that the existing building is entirely unsuitable for offices due to a lack of natural daylight. It thus appears very odd that they are now seeking planning permission for a new building with large open plan offices with limited windows and thus natural light.

Furthermore, the existing building has a floor area of 155 sq. m with one floor. The proposed building has a floor area of 622 sq. over three floors. However, the stated increase in staff is only five, from ten currently to fifteen following the construction of the new building. This indicates the building is intended to provide accommodation for five staff per floor. Based on the scale of the building and its internal layout this appears slightly odd. It is also worth noting that the applicant has previously stated that Brockhall Village is not an appropriate or suitable location for offices. This is summarised in the planning history section of this letter.

Taking all of the above into a consideration and having regard to the site's planning history and permitted development rights available under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development (England) Order 2015, which allows office buildings to be converted to residential development, it is our view that planning permission is being sought for an two and a half storey office building with the purpose of latterly developing the site for housing. This is either directly through the conversion of the new building using permitted development rights or indirectly by creating a clear and strong baseline floor area of residential development on the site, which could then be used to justify one or more dwellings. In addition, we are concerned that attempts are being made to incorporate the open land to the south within the curtilage and circumvent the public open space designation.



The applicant's explanation and intentions seem to change with every application and are entirely inconsistent with one another. As a result, we urge the Council to go back and review the Planning Statements for previous applications, which we believe indicate the applicant's true aspirations and intentions for this land, namely, to realise and extract maximum value from it via residential redevelopment of both the former village hall site and adjacent public open space.

Such an approach is disingenuous and amounts to planning permission by stealth and whilst the Council cannot prevent an application being made on this basis, the Council do have the power to prevent such a situation from arising in the future through the refusal of planning permission for this scheme.

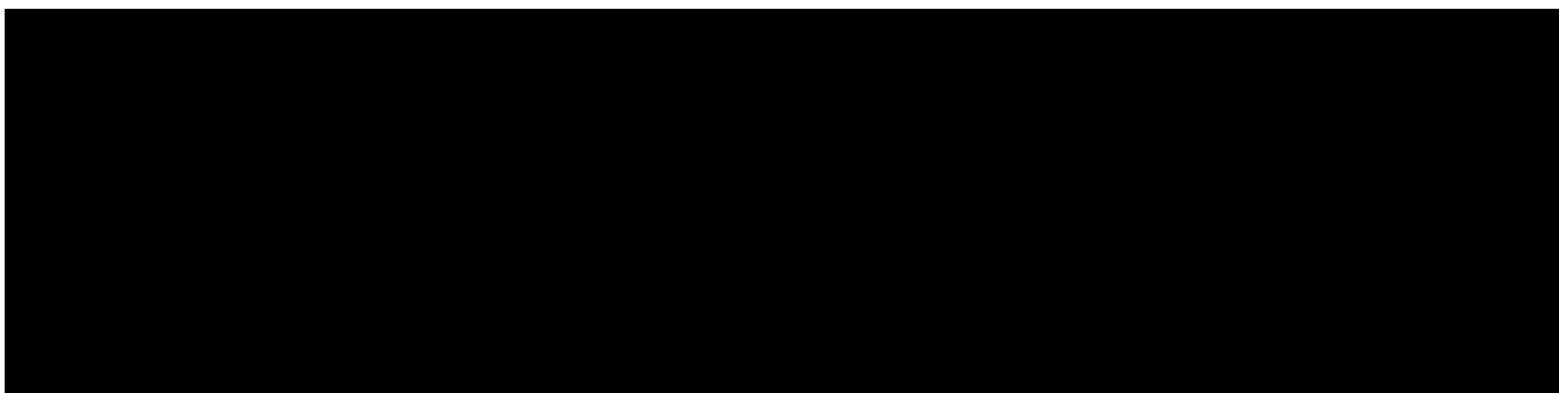
Whilst there are other reasons why this scheme should be refused and it is contrary to the Development Plan (which we will explain in more detail below), we urge the Council to ensure that one of the reasons for the refusal of planning permission is a concern, given the sites planning history, about the future use of the site and the applicants true intentions.

It is appreciated that the Council could simply impose a planning condition on any grant of planning permission, which removes permitted development rights allowing a future change of use from office to residential. However, this is unlikely to prevent such a change in the future. There are two reasons for this.

1. The applicant could simply seek to apply to have the condition removed.
2. If the office development was constructed and was subsequently not used or vacated it is extremely unlikely that it would attract new occupants. We can say this with a high degree of confidence given that the owner of the office accommodation at the entrance to Brockhall Village constantly struggles to find tenants. Indeed, a review of Right Move will confirm that there is significant office accommodation available for let in this development. This accommodation is arguably better located and would be more attractive to the market. As such, if the owner of these premises cannot find tenants for this accommodation, it is even less likely that an occupant would be secured for the proposed building.

In such a scenario it is highly likely that the applicant would apply to change the use of the building. Faced with a vacant building that had been marketed without success, the Council would find it very difficult to refuse planning permission for its conversion. Indeed, this is exactly how the village hall came to be in an office use in the first instance.

Given the high likelihood of this scenario occurring, we urge the Council to refuse planning permission on this basis (alongside a number of other reasons) and ensure that planning permission for residential development of the site and adjoining public open space is not secured by stealth and via the back door. Having regard to the information contained in this submission and various previous applications for this site, it is our view that applicant's true intention is not to build an office for their company, but to realise a development value from the land.



Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that “if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Act, the determination must be made in accordance with the plan, unless material considerations indicate otherwise”. Any issue that relates to the use and development of land is capable of being a material planning consideration, this includes government statements of planning policy.

The Development Plan for Ribble Valley comprises is the adopted Core Strategy (2014) and the adopted Housing and Development DPD (2019).

The following policies from the Core Strategy are considered applicable to this proposal:

- Policy DSI *Development Strategy* – This notes Brockhall Village to be a Tier 2 Village Settlement. New development needs to meet proven local needs or deliver regeneration benefits.
- Policy DS2 *Presumption in Favour of Sustainable Development* – rehearses national policy and requires development to accord with the Development Plan.
- Policy EC1 *Business and Employment Development* – states that employment development will be directed towards the main settlements of Clitheroe, Whalley and Longridge.
- Policy DMG1 *General Considerations* – requires development to meet a number of criteria with regards to design, access, amenity, environment and infrastructure, including the following:
 - Be of a high standard of design.
 - Be sympathetic to existing and proposed land uses in terms of size, intensity and nature as well as scale, mass, style, features and building materials.
 - Consider density and layout with particular emphasis on visual appearance and relationship with surroundings.
 - Consider the potential traffic and car parking implications.
 - Not adversely affect the amenities of the surrounding area.
 - Not result in a net loss of important open space.
- Policy DMG2 *Strategic Considerations* – requires development to be in accordance with the development strategy and support the spatial vision. Within Tier 2 Village Settlements development is required to meet one of six criteria. With regards economic development it is required to be “essential to the local economy or social wellbeing of the area”.

- *DMG 3 Transport and Mobility* - states that the Council will assess proposals in the context of the development strategy but will also attach considerable weight to the availability and adequacy of public transport and associated infrastructure, including pedestrian and cycle infrastructure.
- *DMB1 Supporting Business Growth and the Local Economy* – states that development proposals will be determined in accordance with the Core Strategy and detailed policies of the Plan as appropriate. It goes on to state that the expansion of firms within settlements will be permitted on land within or adjacent to their existing sites, but only provided there are no significant environmental problems, and the extension conforms with other policies in the Plan.
- *DMB4 Open Space Provision* -states that the Council will refuse development proposals that involve the loss of existing public open space. It goes on to state that “*it is important to protect existing recreational areas from development*”.

Objections

As is set out at the start of this letter, our client [REDACTED] raises strong objection to the development and considers a proposal to erect a two and half storey office building on the site to be contrary to the Development Plan. Accordingly, it is respectfully requested that planning permission is refused. The reasons for this are explained below.

Principle of Development

Whilst the site is currently in an office use, this is only the case due to a need to put the former village hall to a productive use and prevent the building laying vacant and unused. Its conversion to office accommodation was as a result of unique and specific set of circumstances and it is unlikely that planning permission would have been granted for a new build office in this location.

The application site is in the centre of Brockhall Village and the heart of a residential area. It is therefore not a suitable or appropriate location for office development, particularly one of the size and scale (622 sq. m) proposed within this application. By their own admission that applicant has previously stated in earlier applications that the site is not a suitable location of an office and their business headquarters.

Brockhall Village is a Tier 2 Village Settlement which on account of its unsustainable location is at the bottom of the settlement hierarchy. It is for this reason that Policy DSI is clear that new development in Tier 2 village settlements will only be supported where it meets a proven local need or delivers regeneration benefits. The application scheme does not meet either of these requirements and as such, is entirely contrary to Policy DSI.

Policy ECI is specifically concerned with employment development and directs new employment development to the Borough's main Tier 1 settlements of Clitheroe, Whalley and Longridge, which are the most sustainable locations within the Ribble Valley. The site is outside of these areas. The scheme is therefore entirely contrary to this policy.

Whilst Policy DBI supports the expansion of existing firms and employment sites within settlements, this is only where there are no environmental issues and the extension conforms with other policies in the Plan. In this case the development does not accord with other policies in the Plan and is contrary to them. The scheme cannot therefore be considered to accord with Policy DBI.

Finally, Brockhall Village is an unsustainable location and whilst it is served by a limited bus service it cannot be considered an accessible location and one that can be reached by a choice means of non-car modes of travel. Given the development has the potential to accommodate 52 employees (applying accepted employment densities contained in The Employment Density Guide 3rd edition (Nov 2015)), it is clear that the application site is an entirely inappropriate location for an office development of this scale and that to grant planning permission would be supporting unsustainable patterns of development.

Whilst the applicant has stated the premises will only be occupied by 15 employees, the building appears overly large for this number of people (5 employees per floor). Any grant of planning permission would also not be personal to the applicant and thus the development could be occupied by another business in the future. As such, consideration has to be given to the real-life capacity of the premises. This is also relevant with regard to traffic and parking matters.

Having regard to these facts, it is clear and self-evident that the form of development proposed within this application is not appropriate for this site and this location in the heart of Brockhall Village and a residential neighbourhood. Accordingly, the scheme is considered wholly unacceptable in principle and entirely contrary to the adopted Development Plan.

Traffic, Highways and Parking

As the site is located within Brockhall Village and accessed from roads that are not adopted the Highway Authority have not raised any objection to the proposed development. It is therefore for the Council to make sure that the traffic, highways and parking impacts of the proposed development are robustly considered and assessed.

Brockhall Village is a residential area and access to the site is via residential estate roads that are not designed to accommodate the high traffic movements that would be associated with an office development of this scale. The roads in Brockhall Village are not adopted and are of a substandard width. Having regard to the scale of development proposed, which is substantial for its location in the heart of a housing estate, it is considered that the application should be supported by a Transport Statement which not only considers the amount of traffic generated by the development but also its impact and the accessibility of the site by public transport and non-car modes. It is considered that

such an assessment would likely show unacceptably high levels of traffic for the location and that the site is an entirely unsustainable and inappropriate location for a commercial office development.

In terms of car parking, having regard to the scale of development proposed and the number of employees that could be accommodated in a building of this size, and taking into account the unsustainable location of the site and the complete lack of suitable off street parking provision, it is considered that the proposed development does not provide sufficient car parking provision to meet the needs of the building. Whilst the scheme is only slightly below standard, in this case, given the location and context of the site and the lack of suitable space on street for overspill parking, granting planning permission for an office of this scale has the potential to cause local road safety issues and hazards.

It is also considered that the visibility splays at the site access are substandard and obscured due to the presence of boundary planting which exceed 1 metre in height.

Accordingly, we consider that planning permission should be refused for the development on grounds of it being an unsustainable location for new office accommodation; the application failing to provide sufficient information to enable the traffic impact of the development to be properly considered; a failure to demonstrate suitable and safe access to the site and insufficient car parking provision. The development is therefore considered contrary to Policy DMG3 of the Development Plan.

Out of Character

Having regard to the residential location of the site, a two and a half storey office building is considered to be entirely out of keeping with the character of the village as well as the site's immediate context. Brockhall Village is a residential area and not a commercial area. Siting a substantial office building in the centre of it is entirely inappropriate. The proposals are thus considered contrary to Policy DMG1 of the Development Plan.

Loss of Public Open Space

Part of the application site comprises land designated public open space. Policy DMB4 is very clear that the Council will refuse development proposals that involve the loss of public open space. Whilst the loss is only a small amount, it is public open space nonetheless and thus should be refused on this basis.

We also question whether the proposed development can actually be accommodated within the area of the red line and thus whether the loss of designated public open space is thus even greater.

Design

The design and external appearance of the building is not considered typical of an office building. In fact, the building does not look like an office building at all. It also does not appear to address all the issues the applicant states are an issue with the current building i.e. limited light. The design and external appearance of the building is thus considered inappropriate as an office building.

As set out elsewhere in this letter, it also appears to [REDACTED] that the building has been designed with a residential end use in mind and that the applicant is intending to make use permitted development rights, which will enable the office building to be converted to residential.

Notwithstanding these facts, the building is not of a high-quality design and is not in keeping with the design of other buildings in the vicinity. Accordingly, the scheme is considered to contrary to Policy DMG1 of the adopted Development Plan.

Conclusion

In conclusion, the development is considered to be entirely inappropriate and unsuitable for a location in the heart of a residential area. The site is also a wholly unsustainable location for commercial development and will perpetuate existing unsustainable patterns of development. Serious questions also have to be asked about the applicants' true intentions here given the site's planning history.

Having regard to the representations made within this letter, we respectfully request that planning permission is refused for this scheme.

Yours sincerely,

[REDACTED]

[REDACTED]