

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 10 April 2026 19:25  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2026/0214 FS-Case-825645825

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

**Planning Application Reference No.:** 3/2026/0214

**Address of Development:** Land off Albany Drive, Copster Green

**Comments:** I am a resident of Copster Green and have lived here ([REDACTED] [REDACTED]). I am writing to object to the proposal for 26 affordable homes on land adjacent to Copster Green.

First, I want to be clear that as a younger person, I fully understand the need for affordable housing. However, the key issue is not whether housing is needed, but whether this is the right place for it. I strongly believe that it is not.

This site has already been tested at appeal, and the Planning Inspector dismissed a similar proposal. The Inspector concluded that the site is not a sustainable location, that there was insufficient evidence of local need, and that the development conflicted with the Council's Core Strategy. Importantly, nothing has changed since that decision.

The site remains outside the Tier 2 settlement boundary, in open countryside, where housing is only allowed in very limited circumstances. Those circumstances require clear evidence of local need specific to this area, and I do not believe that has been demonstrated.

From a practical point of view, this is simply not a sustainable location. There are very limited local services, and public transport is poor. Most daily journeys would require a car, which goes against the principles of sustainable development.

There is also the impact on the character of Copster Green. This is a small rural village with no shops, services and little public transport, and this site forms part of its open countryside setting. A development of 26 houses would significantly extend the village into that countryside and change its character in a way that cannot be reversed.

The scale of the proposal is also a concern. It represents a substantial increase for a village of this size, without the infrastructure to support it.

Finally, I am very concerned about precedent. If development is allowed here despite clear policy conflicts and a previous appeal dismissal, it will become much harder to resist further development in similar locations.

In summary, this proposal conflicts with the Local Plan, has already been found unacceptable in principle, is in an unsustainable location, and would harm the character of the area.

For these reasons, I respectfully ask you to refuse this application.

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 11 April 2026 12:38  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2026/0214 FS-Case-825851466

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

**Planning Application Reference No.:** 3/2026/0214

**Address of Development:** Land off Albany Drive, Copster Green

**Comments:** I don't agree with the planning due to the safety of walking along Copster Green with dogs and small children, due to there not being a footpath available. Many years ago [REDACTED] lost her life by an accident on Copster Green whilst walking her dog. This is also dangerous for Salesbury school, due to the fact that they have always had a problem due to the amount of traffic coming from both directions.

**From:** [REDACTED] >  
**Sent:** 11 April 2026 15:03  
**To:** Planning  
**Subject:** 3/2016/0214 Application Ref

**⚠ External Email**

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

Ref the above Application Planning for proposed housing development at the end of Albany Drive, Wilpshire/Salesbury.

First and foremost we do not want these houses to be built.

26 new homes, say hypothetically each couple have a car each. That's  $26 \times 2 = 52$  extra cars going down Albany Drive, to Lovely Hall Lane, to go to A59.  
Then maybe they have 2 children, young adults driving, a car each for work, college, university, another 52 cars plus 52 cars = 104 possible extra traffic, headlights, car engine noise.

You need a car to live here, no shops, no dentist, post office, no doctors, no hairdressers, except Lovely Hall Lane.

Work is out of the district, ie Clitheroe, Blackburn, Manchester, Preston.

The 26 houses will stop our protected wildlife.

Roe Deer, Badgers, Foxes, Petril Bats, birds.

Plus extra strain on sewage system, water, telephone reception here is atrocious, and Internet just about working.

The building workers, machinery, delivery vehicles.

Planning applications for field at the back of Albany Drive.

Planning 3/2014/0307 for 32 dwellings turned down 27/6/2014

Planning 3/2015/0200 to demolish no 29 for 9 dwellings, declined April 2015.

Nigel Evans was our MP and Mr Speaker with his colleague.

A Barrister came from London and said it is in the by laws for this area that it is known for its patches of green land.

Considered to lead new dwelling in open countryside without sufficient justification causing harm to the development strategy for the area.

Take Greenland away and flooding will happen as the water comes off the fields down Albany Drive.

Thank you for listening.



[Sent from Sky Yahoo Mail on Android](#)

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 12 April 2026 17:12  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2026/0214 FS-Case-826237819

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

**Planning Application Reference No.:** 3/2026/0214

**Address of Development:** Land at Albany Drive, Copster Green.

**Comments:** FAO Maya Cullen

I write to object to planning application 3/2026/0214 for the erection of 26 affordable dwellings on land at Albany Drive, Copster Green. This proposal is inappropriate for its location and conflicts with local and national planning policies. It would place residents in a settlement with no services, no safe pedestrian route to public transport, and no demonstrated local need — concerns the Council's own officers raised with the applicant before this application was submitted. My objections are detailed below and supported with references to the applicant's own documents and the LLFA's consultation response.

1) Copster Green lacks the infrastructure to support this development

The Planning Statement confirms the site lies outside the defined settlement boundary of Copster Green and within open countryside. Copster Green is classified as a Tier 2 village under Key Statement DS1 of the Core Strategy. The village has no shop, no GP surgery, no pharmacy, no dentist, no school, no childcare facility and no employment provision. The nearest primary school (Salesbury CE) is approximately 1.4km away along roads without continuous footways. The nearest supermarket, GP and secondary school are in Langho, Whalley or Blackburn — between 4km and 8km away. There is no post office other than a two-hour-per-week service in Salesbury village hall.

RVBC's Core Strategy is clear on the constraints for development in this location:

Key Statement DS1 requires that within Tier 2 villages, development will be required to "meet proven local needs or deliver regeneration benefits". No local need specific to Copster Green has been proven.

Policy DMG2 (Part 2) requires development outside settlement areas to meet at least one of five criteria, including provision of "local needs housing which meets an identified need". The applicant concedes at Section 3.8 of the Planning Statement that waiting list data for the Copster Green area was not made available to them. No parish-level Housing Needs Survey exists for Salesbury parish. Policy DMH3 restricts residential development in open countryside to housing which "meets an identified local need". The applicant relies on Borough-wide and broad sub-area figures from the

2025 AHNA covering dozens of Tier 2 villages across the entire Borough. This does not constitute local need.

At Section 1.7 of the Planning Statement, the applicant discloses the pre-application response from RVBC (ref: RV/2024/ENQ/00109). Officers raised "concerns that the level of affordable housing proposed would not likely be supported in the settlement, and that provision of such units in such a location would increase the cost of living to potential residents due to lack of key services/facilities within walking distance of the site". The applicant proceeded with a substantially unchanged scheme despite this advice. The Council should stand by the assessment its own officers gave.

## 2) Two previous appeals on this site were dismissed on identical grounds

In 2014, an outline application for up to 32 dwellings (ref: 3/2014/0307) was refused and the appeal (APP/T2350/A/14/2222255) was dismissed. The inspector found "a lack of accessibility by a range of means" and that "resultant car trips would be unsustainable journeys". In 2016, an appeal for 9 dwellings on immediately adjacent land (APP/T2350/W/15/3134524) was also dismissed. That inspector specifically noted the applicant "did not quantify specific, more local need for such development in this location".

The fundamental characteristics that led to both dismissals have not changed. Copster Green still has no shop, no school, no GP and no safe footway to bus stops. Repackaging the same site with a different tenure mix does not address the reasons it has already been found unsuitable twice.

## 3) Pedestrian safety and unsustainable transport patterns

The applicant's Planning Statement claims bus stops are within 550m of the site. However, it also concedes that "a short section of Lovely Hall Lane is not a formal footpath" and that pedestrians must use "a grass verge along this lightly trafficked length". A grass verge is not a footway. It is not paved, not lit, and not accessible for wheelchair users, pushchair users, or those with mobility impairments. On winter evenings when darkness falls by 4pm, this route would be unsafe and impractical.

The scheme includes bungalows stated to be suitable for elderly residents. An elderly resident without a car would need to navigate this unlit, unpaved route to reach an hourly bus on the A59 simply to visit a GP or buy groceries. NPPF paragraph 110 acknowledges that sustainable transport solutions will vary between urban and rural areas, but this does not provide licence for development where residents have no realistic alternative to the private car for every journey. The Transport Statement itself acknowledges that the nearest supermarket, GP and secondary school all require travel to settlements 4–8km away.

## 4) Drainage — LLFA formal objection and existing flooding issues

The Lead Local Flood Authority (Lancashire County Council) has issued a formal objection dated 26 March 2026, identifying four fundamental failures against the National Standards for Sustainable Drainage Systems (June 2025):

Standard 1: The applicant has not demonstrated that higher-priority drainage destinations (rainwater harvesting, infiltration) have been explored before defaulting to discharge to a field drain.

Standard 2: No evidence that the first 5mm of rainfall would be managed on-site without generating runoff.

Standard 3 (rate): The SuDS are potentially undersized — sized on a greenfield discharge rate of approximately 9 l/s but proposing to discharge at only 3 l/s, creating an inconsistency in the

contributing area calculations.

Standard 3 (volume): No evidence that post-development runoff volumes for the 1-in-100 year event would be appropriately managed.

The applicant's own Flood Risk Assessment acknowledges that the Albany Drive / Longsight Road junction already experiences surface water flooding due to local highway drainage constraints. Introducing 26 homes with associated hard-surfacing upstream of this junction, served by a drainage strategy the statutory consultee has deemed fundamentally inadequate, risks worsening an existing problem. The LLFA also raises concern that the applicant proposes to connect foul drainage into the surface water system at multiple points — contrary to best practice and posing pollution risk to the local watercourse network.

#### 5) Biodiversity Net Gain deficit

The applicant's own BNG Metric shows the development would result in a net loss of 0.56 habitat units (-24.85%). This falls far short of the mandatory 10% net gain required by the Environment Act 2021. The applicant states that 1.53 off-site habitat units would need to be purchased from a third-party habitat bank, but no provider has been identified, no agreement submitted, and no evidence provided that suitable units are available. A statement of future intent does not satisfy a statutory requirement.

#### 6) Settlement character and scale

Albany Drive is a quiet cul-de-sac of approximately 25 bungalows in a spacious, low-density setting. This proposal would effectively double the number of homes served by the Drive, introducing two-storey semi-detached houses and mews terraces at a density of approximately 33 dwellings per hectare. This bears no resemblance to the existing character. The Design and Access Statement compares the density to the adjacent Brown Leaves Grove development (~32 dph), but Brown Leaves Grove lies within the settlement boundary and was approved through the development plan process. Using an approved infill scheme to justify a countryside extension is a flawed comparison.

The proposal would extend built form approximately 180 metres further south into open countryside beyond the settlement boundary, introducing an urbanising suburban layout alien to Copster Green's rural character, contrary to Key Statement EN2 (landscape protection) and Policy DME2 (landscape and townscape protection).

#### 7) Precedent

If this application is approved, the reasoning underpinning it — that Borough-wide housing need combined with the tilted balance justifies development outside any settlement boundary regardless of local services — would apply equally to every Tier 2 village in Ribble Valley. There would be no principled basis to refuse similar schemes in Read, Grindleton, Tosside, Bashall Eaves or any other small settlement. The spatial strategy of the Core Strategy would be rendered meaningless.

#### 8) Conclusion

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

1. The site is an unallocated greenfield site outside the settlement boundary, in a village with no services, contrary to Core Strategy policies DS1, DMG2 and DMH3. No local need specific to Copster Green has been demonstrated. The Council's own officers warned the applicant at pre-application

stage that housing here would increase residents' cost of living.

2. Two previous appeal inspectors have dismissed development on this site and adjacent land on identical sustainability and accessibility grounds. The physical characteristics of Copster Green that led to those decisions have not changed.

3. The pedestrian route to bus stops requires walking along an unlit lane without footways to reach hourly services on a fast-moving A-road. This is unsafe and impractical, particularly for elderly residents and those without cars.

4. The Lead Local Flood Authority has formally objected, identifying fundamental deficiencies in the drainage strategy against all three core National Standards. The applicant's own FRA acknowledges existing surface water flooding at the site's only access point.

5. The scheme fails to deliver the statutory 10% Biodiversity Net Gain, with a recorded deficit of 0.56 habitat units and no off-site provision identified or secured.

6. The suburban estate layout would double the built footprint along Albany Drive and extend 180 metres into open countryside, producing a form of development alien to Copster Green's rural character.

For these reasons, I respectfully request that RVBC refuse planning permission for application 3/2026/0214. Should the Council be minded to approve the scheme, I ask that it secure robust conditions and contributions to address drainage, biodiversity, highways and pedestrian safety impacts. However, given the fundamental policy conflict, the LLFA's formal objection and the site's established history of appeal dismissals, the only appropriate course is to refuse the application.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 12 April 2026 17:14  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2026/0214 FS-Case-826236202

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Planning Application Reference No.:** 3/2026/0214

**Address of Development:** Albany Drive, Copster Green

**Comments:** Comments from [REDACTED]

We are writing to share our thoughts on the submission of the potential planning application for Albany Drive, Copster Green. We feel strongly that we must raise our concerns regarding this planning application for the following reasons:

We already have considerable congestion issues on Lovely Hall Lane at particularly at school times. At peak times this renders the lane dangerous to pedestrians and causes difficulties for us exiting our property. Any additional traffic whilst building is ongoing will be disruptive at best. Not to mention the additional traffic generated by the residents of any additional dwellings - potentially 52 further cars if the household is on average a 2 car household.

Albany Drive itself is not a particularly wide road and currently when cars are parked on both sides and/or residents wish to mobilise from their drives this can be tricky without the potential flow of additional traffic. Also access to the site will be extremely disruptive for all residents for a protracted period of time.

The appeal of living in such an area as Copster Green is it's green spaces and peace and quiet. To see yet another piece of green belt land decimated along with the wildlife and ecology of the area is saddening, particularly when I believe Ribble Valley Borough Council has already / is over target to meet it's 5 year housing requirement. Is yet another planning application strictly necessary?

There is a well documented lack of amenities at Copster Green which for those that currently reside here is certainly part of the charm. However, any increase in dwellings, will of course lead to an increase in traffic, perpetuating the issues as mentioned above. The traffic at School time both travelling down the lane and parked along the lane is extremely, and at times dangerously congested, with the School consistently having to speak to parents regarding respect for residents / traffic calming measures. I feel this will only get worse.

Will the local primary school be able to accommodate further children - that I can't comment on.

Continual drainage issues are already evident in gardens on Albany Drive, (its definitely evident [REDACTED] [REDACTED] and neighbours report similar) I fear building further will exacerbate this for the existing residents.

I don't believe any of the issues have changed since the last planning proposal for this piece of land was declined. Putting yet another application for planning in seems fruitless and is simply causing stress for the residents.

Whilst on this subject, the majority of residents of Albany Drive are elderly and vulnerable. Some are requiring daily care and others are in poor health. I can only speak for ourselves, but would like to use my [REDACTED] as an example. Last year after being [REDACTED] residents of Salesbury & Wilpshire, and after spending some time selecting the most appropriate place to live in their later years (they are both in [REDACTED] They made a somewhat stressful move from [REDACTED] and [REDACTED] to be able to live their remaining years peacefully and independently, [REDACTED]. The news of a potential planning application with the inevitable noise, disruption and stress this will cause for them and the other vulnerable residents on the road is frankly upsetting. There is much medical literature providing evidence that stressful situations such as this can accelerate already chronic health conditions, lead to others and shorten life span in this age group. I fear this potential plan to build will be of great detriment to the residents of this area who wish to live in peace and calm in their later / remaining years.

I appeal to you to decline this application for the reasons outlined above.

**From:** [REDACTED]  
**Sent:** 12 April 2026 17:37  
**To:** Planning  
**Subject:** Re: 3/2026/0214

**⚠ External Email**

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Ftao of Maya Cullen

On Sun, 12 Apr 2026, 14:45 [REDACTED] > wrote:

Dear Ms. Cullen.

Please find my objections to the proposed planning application for Albany Drive, based on the following reasons all equally valid.

The fields proposed for development are home to a large number of wild animals. These include:

Hazel Dormice (protected species)

Badgers (protected species)

Bats (protected species)

Foxes

Deer

Owls

Rabbits

Field mice

Wood mice

Shrews

Voles

And many other small mammals.

There is also a small stream/ditch running down the right hand side of the fields also. This will be home to Newts, Frogs and Toads.

By building on the fields, their habitat will be disturbed and destroyed.

All over the country wildlife is losing its natural habitat, and this is causing problems not just locally, but nationally. Building on their territory will cause major disruption to their dens, setts and nests, forcing them away. They will not only lose their homes, but the food they need to survive also.

I found out last year that before the Brown Leaves estate was built between the A59 and Albany Drive, the pond on the former Brown Leaves Hotel was home to Great Crested Newts, a protected species. A person who had a financial interest in acquiring the land for building put poison in the pond, killing the Newts. I wasn't aware of this at the time, as I would have acted on it.

This is not only illegal, it decimates the local wildlife population, and makes a rare species even rarer.

It also shows the level people will stoop to to get their own way.

The infrastructure is another concern. United Utilities have not replaced or maintained the water pipes in a long number of years. My [REDACTED] on Albany Drive since 1 [REDACTED] and have neither seen or heard of any replacements or maintainence.

In neighbouring Blackburn, new houses were built off Yew Tree Drive. The effect on the water services at nearby Pleckgate was chaotic and unacceptable. The pipes could not cope with the increased demand due to being old and unmaintained. A United Utilities engineer had the bright idea of turning the water pressure up. This resulted in burst pipes, overflowing drains and poor water pressure for homes and businesses, showing the pipes were unfit for the increased demand. This is a classic example of showing how the infrastructure is not fit for purpose, and since the pipes on Albany Drive have not been replaced or maintained, I predict this will happen here.

Green spaces are particularly important to people's physical and mental health. The increase in heavy plant, noise, light pollution and traffic will have a detrimental effect on the local people, alongside the loss of the wildlife and its habitat.

I will be contacting UK wildlife preservation organisations for advice around this proposed building work, as the damage it will cause will be irreparable.

Kind regards,

[REDACTED]

[REDACTED]

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**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 12 April 2026 21:16  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2026/0214 FS-Case-826304316

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

**Planning Application Reference No.:** 3/2026/0214

**Address of Development:** Land off albany drive copster green

**Comments:** I don't think that the road infrastructure is capable of the increase in traffic and it is dangerous to local people, it is dangerous already with the local school and people parking there car down the road ,i do believe there could be an increased risk to life and The roads are poorly maintained, they are used by farmers also moving animals across which with the increase of traffic could also contribute to an increase in risk. There are also no footpaths and it is a very dangerous road when you walk it with your dog.i also know in winter time the road is full of ice and there are no run off points and no lights or barriers. You usually can not make it up the hill and would have to come down it, which means you have to reverse down because theres no where to turn round.

Ribble Valley Council Planning Department  
Council Offices  
Church View  
Clitheroe  
BB7 2RA



6<sup>th</sup> April 2026

13 APR 2026

**Ref: Objection to Planning Application 26/0214 at Copster Green.**

Dear Sir / Madam,

We would like to formally object to the proposed plan, as it directly conflicts with the Ribble Valley Core Strategy, relevant Development Management policies, and the National Planning Policy Framework (NPPF).

**1. Conflict with Core Strategy Policy DS1 (Development Strategy)**

Policy DS1 directs the majority of new development towards defined settlements and seeks to protect the open countryside from inappropriate development.

The application site lies outside the defined settlement boundary and is therefore within open countryside. The proposal for 26 dwellings constitutes a significant residential scheme that is not consistent with the spatial strategy.

The applicant acknowledges conflict with the development plan but seeks to rely on the Council's housing land supply position. However, the proposal clearly fails to align with the locational priorities of Policy DS1, and this conflict should be given substantial weight.

**2. Conflict with Policy DMG2 (Strategic Considerations)**

Policy DMG2 requires that development:

- Is located in the most sustainable locations
- Does not lead to unacceptable environmental, social, or economic impacts
- Respects the character of the area

This proposal fails these criteria:

- Sustainability: The site is poorly related to services and facilities, resulting in reliance on private vehicles
- Social impacts: Future residents will have limited access to essential services without private transport
- Character: The development would extend into open countryside, eroding the rural setting

The proposal therefore conflicts with the overarching principles of Policy DMG2.

### **3. Conflict with Policy DMH3 (Dwellings in the Open Countryside)**

Policy DMH3 strictly controls new residential development in the open countryside, permitting only limited and specific exceptions (e.g. agricultural workers' dwellings, conversions, or replacement buildings).

A scheme of 26 new dwellings does not fall within any of the exceptions set out in Policy DMH3.

As such, the proposal is clearly contrary to this policy and should be refused on that basis alone.

### **4. Unsustainable Location – Conflict with NPPF (Section 2 and Section 9)**

The NPPF promotes sustainable patterns of development (Paragraphs 7–9) and seeks to reduce reliance on the private car (Paragraph 105).

This site has previously been dismissed at appeal, where the Planning Inspector concluded that it represents an unsustainable location due to:

- Limited access to day-to-day services
- Inadequate public transport provision
- Heavy reliance on private vehicles

These circumstances have not materially changed. The current proposal does not overcome the Inspector's findings and remains contrary to the core sustainability objectives of the NPPF.

### **5. Inadequate Public Transport – Conflict with NPPF Paragraph 105**

Paragraph 105 of the NPPF states that significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes.

The applicant relies on limited bus services to justify accessibility. However, infrequent rural services do not provide a realistic alternative to private car use.

As such, the proposal fails to meet the requirements of Paragraph 105 and cannot be considered sustainable development.

### **6. Misapplication of the Tilted Balance (NPPF Paragraph 11)**

The applicant argues that the Council cannot demonstrate a five-year housing land supply and therefore the "tilted balance" should apply (Paragraph 11(d) of the NPPF).

However, Paragraph 11 does not automatically justify approval. Development should only be approved where adverse impacts do not significantly and demonstrably outweigh the benefits.

In this case, the adverse impacts include:

- Conflict with the spatial strategy (DS1)
- Development in open countryside (DMH3)
- Unsustainable location and transport reliance
- Harm to landscape character

These harms are clear, significant, and enduring, and outweigh the limited benefits of the scheme.

## **7. Affordable Housing – Conflict with Policy DMH1 and Sustainability Principles**

While the provision of affordable housing is acknowledged, Policy DMH1 requires that housing development be appropriate in scale and location.

No robust, up-to-date evidence has been provided to demonstrate a specific local need for affordable housing in this location. Furthermore, placing affordable housing in an area with limited services and high transport costs undermines its accessibility and effectiveness.

This concern was also raised in pre-application advice and remains unresolved.

## **8. Landscape and Countryside Impact – Conflict with Key Statement EN2**

Key Statement EN2 seeks to protect and enhance the landscape character of the borough.

The site is currently undeveloped greenfield land forming part of the rural setting of Copster Green. Its development would:

- Extend the built form beyond the established settlement boundary
- Erode the transition between village and countryside
- Introduce suburban development into a rural landscape

This results in clear conflict with EN2 and associated landscape protection objectives.

## **9. Precedent and Cumulative Harm**

The previous appeal decision highlighted the risk of setting a precedent for further development in this location.

Approval of this application would undermine the integrity of the development plan and make it more difficult for the Council to resist similar proposals, leading to incremental encroachment into the countryside.

## **Conclusion**

The proposal is in clear conflict with:

- Core Strategy Policy DS1
- Development Management Policies DMG2, DMH3, and DMH1
- Key Statement EN2
- The NPPF, particularly Paragraphs 7–9, 11, and 105

The site remains an unsustainable location for residential development, and the harms identified are substantial and enduring.

For these reasons, we respectfully request that planning permission be refused.

Yours Faithfully

