

**From:** [REDACTED]  
**Sent:** 14 October 2026 08:19  
**To:** Planning  
**Subject:** F.A.O Kathryn Hughes  
**Attachments:** 20261014\_011003.mp4

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**⚠ 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.

**FORMAL OBJECTION AND SUBMISSION OF MATERIAL EVIDENCE**

**Re: E3P Noise and Vibration Impact Assessment – Reference 260315, dated 12 October 2026**

**Subject: Formal Challenge to the Validity of the Assessment and Request for Full Consideration of Existing Environmental Evidence – Tarmac Operations and Oakmere Proposed Development**

Dear Planning Officer,

I write to formally challenge the findings and reliability of the E3P Noise and Vibration Impact Assessment (Reference 260315), dated 12 October 2026, and to request that the Council gives full consideration to substantial existing evidence concerning the environmental impact of Tarmac's operations on neighbouring residential properties.

**I consider the assessment to be fundamentally unrepresentative of actual site conditions and therefore unsuitable, in its present form, as a reliable basis upon which to determine the proposed planning application.**

**1. Fundamental Concerns Regarding the Validity of the Assessment**

My principal concern is that the E3P assessment was undertaken during a period when Tarmac was not operating or processing materials in its normal manner.

**This is a critical omission.**

An assessment undertaken during a period of inactivity cannot reasonably be considered representative of the noise and vibration experienced by residents when the site is fully operational.

I was aware of E3P's attendance at the site alongside Mr Andrew Dent, Head of Ribble Valley Borough Council's Environmental Health department.

[REDACTED], I specifically raised the concern that a firm had undertaken its monitoring when Tarmac was not carrying out its normal processing activities.

The Council was therefore made aware of this concern.

**Unless E3P can demonstrate that its monitoring accurately represents normal and reasonably foreseeable operational conditions, I submit that the assessment should be afforded no material evidential weight in determining the application.**

At the very least, a further independent assessment must be undertaken during representative periods of full operational activity, including relevant early morning, evening and night-time operations.

## **2. Two Years of Documented Environmental Complaints and Evidence**

[REDACTED]

During this period, substantial evidence and complaints have been submitted to Ribble Valley Borough Council relating to:

- Excessive and intrusive industrial noise, including processing machinery, crushing activities and associated vehicle movements.
- Persistent and offensive odours affecting residential properties and the ability to use gardens or open windows.
- Dust emissions and deposits affecting neighbouring homes and vehicles.
- Vibration and disturbance associated with industrial operations, including activity outside normal daytime hours.

These are not isolated or speculative concerns. They form part of an established and continuing complaint history, supported by residents' observations, recordings and documented incidents.

**I formally request that the Planning Department obtains and reviews the complete Environmental Health case file held by Mr Andrew Dent before reaching any determination on this application.**

That file contains material evidence directly relevant to the environmental conditions surrounding the proposed development.

It would be wholly inappropriate to rely upon a limited acoustic assessment without properly considering the Council's own existing records of complaints and supporting evidence.

## **3. Tarmac's Own Objection – Material and Contradictory Evidence**

Of particular significance is the fact that Tarmac itself has submitted an objection to the proposed development, raising concerns which, as I understand them, reflect the very environmental impacts that I and other residents have been reporting to the Council for approximately two years.

This is an important matter that requires careful examination.

**If Tarmac is itself identifying operational noise and associated environmental impacts as reasons to object to residential development in closer proximity to its operations, this directly reinforces the need for the Council to investigate the existing complaints and assess the suitability of the proposed residential location.**

The Council cannot reasonably disregard longstanding concerns raised by existing residents while simultaneously considering new residential development that would bring additional families closer to the source of those same environmental impacts.

I request that Tarmac's objection is examined alongside the Environmental Health records and that any relevant admissions or statements concerning operational noise, odour, dust or vibration are expressly addressed in the planning officer's report.

#### 4. Recent Evidence – Noise Levels Approaching 80 dB(A)

To demonstrate that these concerns remain current and unresolved, I enclose a sound recording made at [REDACTED] on the evening of 13 October 2026.

During this incident, I recorded a noise level of just under **80 dB(A)** at [REDACTED]. Please listen to the recording at the relevant 80dba (ie) Turn volume up on your device.

This is further evidence of the substantial disturbance that residents continue to experience.

I acknowledge that an individual sound-level reading is not, in isolation, a substitute for a professionally conducted acoustic assessment. Nevertheless, it is material supporting evidence of the conditions being reported and warrants proper investigation.

It is particularly concerning that Oakmere proposes to introduce new residential properties closer to Tarmac's operations than existing affected homes.

**The Council must establish, through robust and representative evidence, whether acceptable residential living conditions can realistically be achieved at the proposed development.**

It should not assume that future occupants will be adequately protected based upon monitoring undertaken when the industrial operation was inactive.

#### 5. Continuing Investigation and Further Monitoring

Residents are currently establishing a coordinated WhatsApp group to record, document and report further incidents of industrial noise and environmental disturbance.

This initiative is being progressed in communication with Mr Andrew Dent, with further sound monitoring anticipated when Tarmac resumes its relevant operational activities.

The purpose is to establish a consistent and comprehensive record of the actual conditions experienced by local households.

This ongoing investigation further demonstrates why the Council should not treat the E3P assessment as a definitive representation of the site's environmental conditions.

#### 6. The Council's Planning and Environmental Responsibilities

The Council has a responsibility to consider relevant environmental evidence when determining whether a proposed development would provide acceptable living conditions for future occupants.

In particular, I draw attention to:

- **The Environmental Protection Act 1990**, including Part III concerning statutory nuisances, which is relevant to the Council's separate Environmental Health responsibilities in investigating qualifying noise, odour and other nuisance complaints.
- **The National Planning Policy Framework**, which requires planning decisions to consider pollution, noise and the protection of residential amenity.
- **The Noise Policy Statement for England**, which addresses the need to avoid significant adverse impacts on health and quality of life arising from environmental noise.
- **The agent of change principle**, which requires appropriate consideration of existing businesses and activities when new noise-sensitive development is proposed nearby.

The agent of change principle is particularly relevant here. The introduction of new residential properties closer to an established industrial operation must not proceed without a proper assessment of the potential impact on future residents and the implications for existing lawful operations.

Given the extensive complaint history already held by the Council, there is a clear need for particular care in assessing the environmental suitability of this development.

**Where the Council is already in possession of credible evidence of significant environmental disturbance, approving further residential development without adequately investigating and addressing those concerns could expose the decision to serious questions regarding the adequacy of the evidence and the lawfulness of the decision-making process.**

I therefore ask the Council to ensure that all relevant evidence is properly examined and that its conclusions are clearly documented before any planning permission is granted.

## **7. Formal Requests to the Planning Authority**

In light of the above, I formally request that the Council:

1. **Declines to rely upon the E3P Noise and Vibration Impact Assessment** unless and until its representativeness and methodology have been satisfactorily demonstrated.
2. **Requires a further independent noise and vibration assessment**, undertaken during representative periods of normal Tarmac operations, including relevant out-of-hours activities.
3. **Obtains the complete Environmental Health case file from Mr Andrew Dent**, including the complaint history and supporting evidence accumulated over approximately two years.
4. **Reviews Tarmac's own planning objection in full**, particularly any statements concerning operational noise, odour, vibration and the potential incompatibility of nearby residential development.
5. **Considers the cumulative environmental impact** of noise, odour, dust and vibration upon both existing and proposed residential properties.
6. **Defers determination of the planning application** until the identified evidential shortcomings have been addressed and the Council is satisfied that the proposed development can provide acceptable living conditions.
7. **Provides a written response** confirming how these matters have been considered and how the evidence has been taken into account in the planning determination.

## **8. Conclusion**

██████████, I have consistently raised concerns regarding the impact of Tarmac's operations on the health, wellbeing and residential amenity of neighbouring households.

The Council has been made aware of these concerns and holds an established record of the issues reported.

It is therefore deeply concerning that a planning application proposing to place further residential properties closer to this industrial operation could be determined on the basis of an assessment undertaken when the relevant industrial processes were not operating.

**An assessment that does not reflect the actual operating conditions cannot provide a sufficiently reliable foundation for such an important planning decision.**

I respectfully submit that granting planning permission without first resolving these matters would be premature and could place future residents at foreseeable risk of serious environmental disturbance.

I urge the Council to treat this submission as a formal objection, to place it on the public planning file and to ensure that the matters raised receive full and proper consideration.

Please consult directly with **Mr Andrew Dent, Environmental Health, Ribble Valley Borough Council, Clitheroe**, who is familiar with the ongoing case and the evidence already submitted.

I request written acknowledgement of this objection and confirmation that the Environmental Health records will be considered before any determination is made.

Yours faithfully,

A black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**Sent:** 14 October 2026 08:37  
**To:** Planning  
**Subject:** F.A.O Kathryn Hughes

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**⚠ 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.

**FORMAL HIGHWAY SAFETY OBJECTION**

**Re: Proposed Emergency Vehicle, Pedestrian and Cycle Access – Ridding Close**

**Reference: Drawing 067/P/01 – Transport Statement T4832-TS-01 Rev 1, Annex B, Paragraphs 8–11**

Dear Planning Officer,

I write to formally object to the proposed emergency access between the Oakmere development and Ridding Close, and particularly to the Local Highway Authority's suggestion that this access should also accommodate pedestrians and cyclists.

**I consider this proposal to present a serious, foreseeable and entirely avoidable risk of collision and personal injury, including potentially fatal consequences.**

The conclusions expressed in paragraphs 8–11 fail to address the actual physical constraints of Ridding Close, the location of existing residential driveways, the restricted visibility and the unavoidable conflict between reversing vehicles, cyclists and pedestrians.

The suggestion that a 3.7-metre-wide access is sufficient to establish the safety of this arrangement is fundamentally flawed.

The width of the proposed opening is not the determining issue. The critical issue is whether pedestrians and cyclists can safely enter and travel along the existing private access road.

**In my submission, the proposed arrangement cannot be accepted without a detailed, site-specific highway safety assessment demonstrating that these risks can be adequately mitigated.**

**1. Immediate Danger to My Property – Reversing Vehicles and Cyclists**

[REDACTED] proposed collapsible bollards and access point.

There is less than two metres of available space in the area where I must manoeuvre and reverse my vehicle off my drive.

The proposed arrangement would introduce cyclists and pedestrians directly into this already restricted manoeuvring environment.

This creates a clear and foreseeable conflict.

When reversing from my property, a driver would potentially encounter cyclists approaching from the proposed access with insufficient separation and restricted opportunity to observe or react to their presence.

Similarly, cyclists entering Ridding Close would be exposed to vehicles reversing and progressing from existing residential properties.

**This is not a theoretical concern. It arises directly from the existing physical layout and the positioning of the proposed access [REDACTED].**

A cyclist emerging into the path of a reversing vehicle could suffer catastrophic or fatal injuries.

I therefore require the developer and Local Highway Authority to demonstrate, by means of properly dimensioned drawings and a vehicle/cyclist conflict assessment, precisely how this risk is to be eliminated or reduced to an acceptable level.

## **2. Restricted Road Width and Blind Bend**

Ridding Close is a narrow private residential access road, effectively accommodating only one vehicle at a time along the relevant section.

It serves three existing residential properties and incorporates a blind bend with severely restricted forward visibility.

Vehicles entering, leaving or manoeuvring along this section cannot necessarily see approaching cyclists or pedestrians around the bend.

Likewise, cyclists approaching the bend may have no adequate warning of a vehicle reversing, turning or travelling towards them.

The combination of:

- A single-vehicle-width carriageway.
- Three existing residential properties with associated vehicle movements.
- A blind bend restricting visibility.
- Limited space for vehicle manoeuvring.
- No dedicated pedestrian footway.
- No street lighting.

creates a potentially dangerous environment for additional pedestrian and cycle movements.

**The developer has not demonstrated that safe intervisibility, adequate stopping distances or suitable pedestrian and cyclist refuge can be achieved.**

The Local Highway Authority should not endorse the proposed route without a properly evidenced assessment of these matters.

## **3. Failure to Demonstrate Compliance with National Planning Policy**

The National Planning Policy Framework requires development proposals to provide safe and suitable access and to address unacceptable highway safety impacts.

National policy also requires the design of streets and transport infrastructure to minimise conflict between pedestrians, cyclists and vehicles.

These requirements are directly relevant to the proposed access.

The fundamental question is whether the developer can demonstrate that this existing private road can safely accommodate the additional movements proposed.

**A statement that the access is 3.7 metres wide does not constitute evidence that the connecting road is safe.**

The Council must assess the entire route, including existing driveways, vehicle manoeuvres, the blind bend and the physical constraints of the surrounding residential properties.

I submit that approval without this assessment would leave a material highway safety issue unresolved.

#### **4. Department for Transport – Manual for Streets**

The Department for Transport's *Manual for Streets* provides nationally recognised guidance concerning the design and safety of residential streets.

Relevant considerations include vehicle speeds, visibility, pedestrian movement, vehicle manoeuvring and the interaction of different road users.

The existing layout at Ridding Close raises serious questions against these principles.

In particular, there is no evidence that the developer has demonstrated adequate visibility for vehicles reversing from the existing properties, or for cyclists approaching from the blind bend.

There is also no demonstrated provision for pedestrians to pass safely when vehicles are manoeuvring or occupying the narrow carriageway.

**The absence of a documented collision history would not, by itself, establish that the introduction of a new pedestrian and cycle route is safe.**

The Council must assess the foreseeable risks created by the proposed change in use, rather than relying on assumptions about the existing arrangement.

#### **5. Cycle Infrastructure Design – Local Transport Note LTN 1/20**

The Department for Transport's *Cycle Infrastructure Design (LTN 1/20)* establishes national guidance for the provision of safe and appropriate cycling infrastructure.

The guidance places importance on safe, coherent and accessible cycle routes, with particular attention to conflicts between cyclists and motor vehicles.

The proposed access raises substantial concerns in this regard.

Ridding Close is not a purpose-designed cycle route. It is an existing narrow private residential access with vehicle movements, a blind bend and no dedicated cycling provision.

The developer's reference to a 3.7-metre-wide paved opening fails to establish that the remainder of the route is capable of accommodating cyclists safely.

**The assessment must consider the actual available width, visibility and conflicts throughout the complete route, not merely the dimensions of the proposed emergency access.**

Where a shared pedestrian and cycle facility is proposed, its design must also address pedestrian safety, accessibility and the potential for conflicts between different users.

No adequate evidence has been provided demonstrating how these requirements will be satisfied.

## **6. No Adequate Space for a Safe Pedestrian Footway**

There is insufficient available width along the relevant section of Ridding Close to provide a properly separated pedestrian footway without materially affecting the existing vehicle access arrangements.

Pedestrians would therefore be required to share the narrow carriageway with moving and reversing vehicles.

This would be particularly concerning for children, elderly residents, wheelchair users and people with impaired mobility or vision.

The proposed route cannot simply be described as a safe shared space without demonstrating how these vulnerable users will be protected.

National accessibility guidance, including *Inclusive Mobility*, is relevant to the assessment of pedestrian routes and the needs of disabled people.

**The developer must establish whether an accessible pedestrian route can actually be provided within the available physical boundaries.**

If the necessary safety measures cannot be accommodated, the pedestrian and cycle connection should not be permitted.

## **7. Absence of Street Lighting and Restricted Visibility**

Ridding Close has no street lighting along the relevant section.

The proposed access would therefore introduce additional pedestrian and cyclist movements into an unlit environment, including during hours of darkness.

The combination of poor lighting, a blind bend and reversing residential vehicles presents a significant foreseeable hazard.

The developer has not demonstrated how pedestrians and cyclists would be made sufficiently visible to approaching or manoeuvring vehicles.

Nor has it established whether suitable lighting could be installed without affecting existing residential properties or requiring works beyond the developer's control.

**The absence of a lighting and visibility assessment is a material deficiency that must be addressed before the proposed access is accepted.**

## **8. Emergency Access Does Not Justify Unrestricted Pedestrian and Cycle Use**

Paragraph 8 identifies the proposed connection as an emergency vehicle access intended for exceptional circumstances where one of the existing accesses from Chatburn Road is unavailable.

This is fundamentally different from creating a permanent pedestrian and cycle route.

An emergency access is designed to accommodate occasional use under controlled circumstances.

A pedestrian and cycle connection would potentially introduce regular movements throughout the day and evening.

The resulting exposure to risk is materially different.

I therefore challenge the Local Highway Authority's reasoning in paragraph 9 that pedestrians and cyclists could benefit from the access.

**Potential convenience does not establish safety.**

Furthermore, the installation of collapsible bollards addresses only the restriction of ordinary motor vehicle movements through the connection.

It does nothing to resolve the dangers created by cyclists and pedestrians entering Ridding Close alongside existing residential driveways and a blind bend.

The proposed bollards are therefore not an adequate response to the highway safety concerns identified.

## **9. Legal Responsibilities and Foreseeable Risk**

The Council must determine this application having proper regard to material highway safety considerations and the evidence before it.

The National Planning Policy Framework expressly recognises unacceptable impacts on highway safety as grounds upon which development may be refused.

The Road Traffic Regulation Act 1984, section 122, also establishes duties relating to the safe movement of traffic, including pedestrians, when authorities exercise functions under that Act. Although this provision is not itself a general prohibition on the proposed development, it reinforces the importance of safe movement in relevant traffic management decisions.

In this case, the Council is being expressly informed of specific and identifiable risks:

1. Vehicles reversing immediately adjacent to the proposed access.
2. Less than two metres of available manoeuvring space at my property.
3. A narrow, single-vehicle-width private road.
4. A blind bend preventing adequate observation of approaching users.
5. The absence of a segregated pedestrian footway.
6. The absence of street lighting.

**These are foreseeable hazards which require a reasoned and evidence-based response.**

Should the Council approve the arrangement without properly assessing these concerns, the adequacy of its decision-making process could be open to legal challenge.

I am therefore formally placing these risks on record and requesting that they are expressly considered and addressed.

## **10. Formal Requirements Before Any Approval**

I request that the Planning Authority and Local Highway Authority require the following before accepting the proposed pedestrian and cycle connection:

1. An independent, site-specific highway safety assessment covering the entire Ridding Close route and its junction with the proposed development.
2. A detailed visibility assessment covering the blind bend, existing residential driveways and proposed bollard location.

3. Vehicle swept-path and reversing-manoeuve drawings showing the interaction between existing residents' vehicles, cyclists and pedestrians.
4. Accurate, dimensioned surveys confirming the available road width and demonstrating whether adequate pedestrian provision can physically be achieved.
5. A lighting assessment addressing the safety of users during darkness.
6. An accessibility assessment addressing children, disabled pedestrians, wheelchair users and other vulnerable road users.
7. Confirmation of the legal rights and permissions necessary to create and maintain a pedestrian and cycle connection across the existing shared private access road.
8. A written, reasoned response from the Local Highway Authority addressing each of the identified hazards and explaining the evidence upon which any conclusion of acceptable safety is based.

## **11. Formal Objection and Requested Outcome**

I strongly object to the proposed use of Ridding Close as a pedestrian and cycle connection to the Oakmere development.

The existing road was not designed to accommodate the additional movements now proposed, and the physical constraints described above create serious concerns regarding the safety of both existing residents and future users.

The proposal places cyclists and pedestrians in direct potential conflict with reversing vehicles, within a restricted and unlit environment incorporating a blind bend.

**I do not accept that the provision of a 3.7-metre-wide access and collapsible bollards demonstrates that this arrangement is safe.**

In my view, the proposed pedestrian and cycle connection is fundamentally unsuitable unless the developer can produce convincing technical evidence demonstrating that the identified risks can be satisfactorily mitigated.

I therefore formally request that:

**The proposed pedestrian and cycle connection to Ridding Close is removed from the development proposals and that the access remains restricted to genuine emergency use only, subject to a separate demonstration that emergency access can be safely and lawfully provided.**

If the Council is minded to support pedestrian and cycle use notwithstanding these objections, I request that the application is not determined until a comprehensive and independent highway safety assessment has been undertaken and its findings made available for public scrutiny.

I further request that this objection is placed on the public planning file and that the Local Highway Authority provides a written response specifically addressing the risks to my property and the existing residents of Ridding Close.

**The safety of existing residents, pedestrians and cyclists must take precedence over the convenience of introducing an additional access route. A foreseeable risk of serious injury cannot be dismissed merely because a proposed opening is considered wide enough to accommodate cyclists.**

Yours faithfully,

