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From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 04 October 2026 11:33
To: Planning
Subject: Planning Application Comments - 3/2026/0635 FS-Case-879703192

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Lancashire

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Planning Application Reference No.: 3/2026/0635

Address of Development: Land East of Clitheroe Road, Whalley – Proposed 39 Dwellings

Comments: OBJECTION TO PLANNING APPLICATION 3/2026/0635

Land East of Clitheroe Road, Whalley – Proposed 39 Dwellings

I wish to formally object to planning application 3/2026/0635 for the proposed development of 39 dwellings on land east of Clitheroe Road, Whalley.

I recognise that this proposal is smaller than the previously refused 77-dwelling scheme and that it includes 12 affordable homes. I also recognise the wider need for housing.

However, my objection is not an objection to housing in principle. It is an objection to the suitability of this particular site, the cumulative impact of further development upon Whalley and whether the significant problems identified previously have genuinely been overcome.

The site is open agricultural land outside the settlement boundary, adjoining the countryside and forming part of the rural approach into Whalley. I believe the proposal would cause significant harm to the character of the village while placing additional pressure on already constrained infrastructure.

My principal objections are:

- Development of open countryside outside the settlement boundary
 - o The site lies outside Whalley's defined settlement boundary and is currently agricultural greenfield land with established field boundaries.
 - o It forms part of the transition between the built-up village and the surrounding open countryside.
 - o Development would extend the built form of Whalley into this countryside setting.
 - o The impact should not be assessed simply by counting the 39 houses. The new access, junction, pedestrian infrastructure, lighting, acoustic barriers, roads, gardens and associated engineering works would collectively urbanise this currently rural approach.
 - o The applicant's description of the site as a "logical extension" of Whalley should therefore be treated with caution.

- The reduction from 77 to 39 houses does not remove the fundamental site constraints
 - o The previous application was refused for a number of reasons, including concerns relating to the site's location, landscape, drainage, ecology and other infrastructure matters.
 - o Although the revised proposal is less dense, the site itself has not moved and many of the underlying constraints remain.
 - o The Council should therefore consider whether the revised scheme has actually overcome those concerns rather than assuming that reducing the number of houses resolves them.

- The proposal should not rely upon affordable housing as a justification for developing this particular countryside site
 - o I fully recognise the importance of affordable housing.
 - o However, general housing need should not automatically be treated as evidence of a specific local need capable of overriding countryside protection policies.
 - o The applicant should demonstrate clearly what local affordable housing need exists and how this particular proposal meets that need.
 - o There are also questions about whether there is sufficient evidence of unmet local demand, particularly given the existence of affordable homes within other recently developed schemes in the area.
 - o Affordable housing is an important benefit of the proposal, but it should not in itself make an otherwise unsuitable countryside location acceptable.

- The site's relationship with Whalley is not as sustainable as the application suggests
 - o The application places considerable weight upon walking, cycling and public transport.
 - o However, the existing pedestrian infrastructure is poor.
 - o There is currently no footway on the eastern side of Clitheroe Road and no dedicated cycle infrastructure along this section.
 - o The proposed development therefore relies upon substantial new highway intervention to create the pedestrian connection which is necessary to make the site appear sustainably located.
 - o The applicant's own Transport Statement gives a walking time of approximately 11 minutes to Whalley centre and approximately 14 minutes to the railway station.
 - o The station is approximately 1.2km away.
 - o The quality, safety and practicality of the route should therefore be assessed rather than relying simply upon theoretical walking times.

- There are serious concerns regarding the proposed highway junction and pedestrian crossing
 - o The proposed access is within the existing 40mph section of Clitheroe Road.
 - o Pedestrians would need to cross the road to reach the existing footway and route towards Whalley.
 - o The proposal introduces a new junction, ghost right-turn lane, crossing/refuge, traffic-calming measures and a proposed 30mph environment.
 - o These interventions demonstrate that the existing road environment is not inherently suitable for the level of development proposed.
 - o The proposed junction should be examined particularly carefully in relation to the existing access to Rookwood, 41 Clitheroe Road.
 - o There appear to be potential conflicts between vehicles turning into the proposed development and vehicles accessing the existing property.
 - o The Council should require the Highway Authority to demonstrate clearly that all vehicle movements, including access to existing properties, can operate safely and simultaneously.
 - o The safety of pedestrians, particularly children, older residents and those with mobility difficulties, should be given particular consideration.

- The existing highway network is already under pressure
 - o Whalley and the surrounding area have experienced substantial residential development in recent years.
 - o Local traffic conditions should therefore be assessed against the current and committed future development, rather than relying predominantly upon historic traffic surveys.
 - o Wiswell Lane is already a narrow and heavily congested route in places, particularly where it connects with the A671.
 - o The traffic assessment should take account of other recently approved developments in the

locality, including developments which have been consented since earlier traffic surveys were undertaken.

- o The predicted traffic generation of only 23 two-way vehicle movements during the peak hour for 39 predominantly large family homes should be scrutinised carefully.

- o Accident data should also be brought fully up to date, particularly given reports of more recent incidents in the vicinity.

- Flooding and drainage remain major concerns

- o Drainage was a specific concern in relation to the previous application.

- o The revised Flood Risk Assessment identifies surface-water flood risk along the northern part of the site and around the lowest areas.

- o The proposed development depends upon attenuation and a controlled discharge to the existing drainage system associated with the culverted watercourse beneath Clitheroe Road.

- o There remain concerns regarding the availability and certainty of the proposed connection and the infrastructure required to make it work.

- o The assessment also relies upon infiltration being unsuitable without site-specific infiltration testing.

- o Most importantly, the entrance to the proposed development and the section of Clitheroe Road beneath the A59 are known locally to experience significant flooding during periods of sustained or heavy rainfall.

- o This is not simply a theoretical concern. Local residents have first-hand experience of regular flooding in this location.

- o The Council should therefore obtain a clear and current response from the Lead Local Flood Authority before accepting that the previous drainage concerns have been satisfactorily resolved.

- o The ability to maintain safe access and egress during significant rainfall events must also be considered.

- The site's proximity to the A59 creates a significant noise problem

- o The submitted Noise Assessment categorises the site as Medium Risk for road traffic noise.

- o The assessment indicates that acceptable internal noise criteria cannot be achieved with windows open.

- o The mitigation therefore relies upon closed glazing and mechanical ventilation, together with substantial acoustic barriers in some locations.

- o This raises an important question about whether the site is inherently appropriate for residential development.

- o A new residential development should provide a satisfactory living environment without relying upon excessive mitigation simply to make an unsuitable location acceptable.

- o The previous application also attracted Environmental Health concerns relating to noise.

- o The current position of Environmental Health should therefore be established before this matter is considered resolved.

- The proposal would result in biodiversity and ecological impacts

- o The submitted biodiversity assessment records an on-site habitat-unit reduction of approximately 10.07%.

- o It also identifies a deficit and reliance upon off-site provision.

- o The Council should therefore look beyond general references to “ecological enhancement” and consider the actual biodiversity calculations and whether the proposed mitigation is deliverable.

- o The site is not simply unused vacant land. It is a green field with established boundaries connected to the wider countryside.

- o Local residents regularly observe wildlife in and around the site, including badgers, bats, deer and a variety of birds.

- o Some residents have observed a badger in the immediate vicinity.
 - o These observations do not, by themselves, establish the presence of a protected species or sett, but they demonstrate why the ecological value and connectivity of the site should not be underestimated.
- Protected mature trees are an important part of the site's character
 - o Mature trees and vegetation provide a significant landscape buffer between the existing settlement and the countryside.
 - o The site and surrounding area contain trees subject to Tree Preservation Orders.
 - o The mature Lime avenue along the southern boundary is particularly important, with trees of substantial height and visual significance.
 - o These trees are also relied upon by the applicant to screen and soften the development.
 - o The Council should therefore consider not merely whether the trees can technically survive construction, but whether the proposed houses can coexist with them over the long term.
 - o Future pressures arising from shading, leaf fall, canopy growth and perceived safety concerns can result in pressure for tree removal or reduction.
 - o The long-term protection of these trees should be treated as a material consideration.
 - The cumulative impact of continued development on Whalley must be recognised
 - o Whalley and the surrounding area have already experienced significant housing development in recent years.
 - o Residents are increasingly concerned that the cumulative effect is eroding the character and infrastructure capacity of the village.
 - o The issue is therefore not simply whether 39 additional houses can theoretically be accommodated on this individual site.
 - o The Council should consider the cumulative effect upon traffic, parking, healthcare, drainage, schools, public services, village character and the ability of existing infrastructure to absorb further growth.
 - o Parking pressure in Whalley village centre is already significant and has been affected by recent changes to the village-centre layout.
 - o Further housing should not be approved without proper consideration of whether the necessary infrastructure is keeping pace with the level of development.
 - Healthcare infrastructure is already identified as a concern
 - o The NHS Integrated Care Board estimates that the development could result in approximately 120 additional patient registrations.
 - o A contribution of £38,880 has been requested towards the expansion/reconfiguration of Whalley Medical Centre. This in my opinion does not even scratch the surface of what is already needed for the overstretched facility.
 - o The NHS has specifically identified the need for capacity to be created in advance of population growth.
 - o This provides independent evidence that additional infrastructure pressure is not simply a perception held by local residents.
 - The consultation process should be reconsidered
 - o The current application is materially different from the previous schemes that were the subject of earlier community consultation.
 - o There appears to have been no equivalent community engagement specifically on the current 39-dwelling proposal.
 - o In addition, some adjoining residents have not received notification as expected.
 - o The applicant's previous consultation material should not automatically be treated as consultation on this substantially different scheme.

o A lower number of objections to the present application should not be interpreted as evidence that community concerns have reduced if residents have simply not been made aware of the revised proposal.

o I therefore ask the Council to ensure that all adjoining residents have been correctly notified and that an appropriate consultation period has been provided.

- The previous appeal decision is highly relevant

o There is an important planning history in this location, including appeal decisions concerning development on land contiguous with or very close to this site.

o Those decisions considered matters including the relationship with the settlement, pedestrian connections, the rural fringe location and the character of development.

o The Council should carefully consider the extent to which those previous findings remain relevant to the current proposal.

o The fact that planning policy has changed does not mean that the physical characteristics and constraints of this site have changed.

Conclusion

I recognise the changes made to the previous proposal and the inclusion of affordable housing.

However, I do not believe that the fundamental objections to developing this particular site have been satisfactorily overcome.

The proposal would:

- extend Whalley into open countryside;
- urbanise the rural northern approach to the village;
- depend upon significant new highway infrastructure;
- create concerns regarding pedestrian and highway safety;
- add further pressure to an already constrained local road network;
- introduce development in an area with known surface-water flooding concerns;
- rely upon a drainage solution which requires further confirmation;
- place homes close to a significant A59 noise source;
- result in an on-site biodiversity loss and reliance upon off-site mitigation;
- threaten the long-term relationship between new development and mature protected trees;
- increase pressure on healthcare and other local infrastructure; and
- contribute to the cumulative erosion of the character and capacity of Whalley and the surrounding area.

For these reasons, I respectfully ask the Council to refuse planning application 3/2026/0635.

The benefits of providing 39 additional homes, including affordable homes, do not in my view outweigh the combined environmental, highway, drainage, infrastructure, landscape and community impacts of developing this particular site.

I ask that these objections, together with the technical evidence and consultation responses received by the Council, are fully considered before any decision is made.