

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 16 September 2026 14:22
To: Planning
Subject: Planning Application Comments - 3/2026/0635 FS-Case-874453350

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0635

Address of Development: Land east of Clitheroe Road Whalley.

Comments: Dear Planning Officer,

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

[REDACTED], [REDACTED]. I followed the previous application closely and have reviewed the principal documents submitted in support of the current proposal.

As an [REDACTED], I am also able to comment from first-hand experience on the site's relationship with Clitheroe Road, its mature vegetation, wildlife and local surface-water conditions around the A59 underpass.

I recognise that the current proposal is materially different from the 77-dwelling scheme refused under application 3/2025/0588 on 6 February 2026. The number of dwellings has been substantially reduced, the layout is less dense and 12 affordable homes are proposed. I also recognise the wider need to deliver additional housing, including affordable housing, within Ribble Valley.

My objection is therefore not an objection to housing in principle, nor simply to the development of [REDACTED]. My concern is whether this particular site has been demonstrated to be an appropriate and sustainable location for the development proposed and whether the underlying constraints identified through the previous application have satisfactorily been overcome.

Consultation

I am concerned that I have not received formal notification of the current application despite being [REDACTED]. Consultation letters are dated 4 September 2026, yet as of the 16th September I have still not received mine and became aware of the application only through TPO officers knocking on my door yesterday morning. The portal states that I have been notified by letter, this is not the case.

I am also conscious that the public consultation described in the applicant's Statement of Community Involvement concerned materially different proposals. The March 2025 public consultation concerned approximately 77–80 affordable homes. That proposal was subsequently refused. There appears to have been no equivalent public consultation specifically concerning the present 39-dwelling mixed market and affordable scheme.
(Statement of Community Involvement, Maybern, August 2026.)

This is relevant in light of Policy DM1 of the NPPF published on 17 August 2026, which places emphasis upon early engagement with neighbours and the local community for major development.

It also means that I would be cautious about interpreting any reduction in the number of representations compared with 3/2025/0588 as evidence of reduced community concern. Residents cannot comment on an application if they are unaware that it has been submitted, especially when their minds are at rest given the rejected scheme.

I would be grateful if the Council could check that adjoining residents have been correctly notified and consider whether further consultation is appropriate, given I have only been afforded 8 days of what should be a 21 day consultation period.

1. Current policy

The national planning-policy position changed immediately before this application was submitted. The new NPPF was published on 17 August 2026 and replaced the December 2024 Framework. Its decision-making policies apply from publication.

However, the applicant's Planning Statement continues to advance its case by reference to the former paragraph 11(d) tilted balance, while the Transport Statement expressly relies upon provisions of the December 2024 NPPF.

The more recent appeal decision concerning land south of Chatburn Old Road concluded that the Council could demonstrate 3.45 years' deliverable supply at that point in time.

The existence of a housing shortfall does not, however, establish that every unallocated site outside a settlement is suitable for development.

Under current Policy S5(1)(j), relevant considerations for housing addressing evidenced unmet need outside a settlement include whether the development is physically well-related to an existing settlement and whether its scale can be accommodated taking account of existing or proposed infrastructure.

Those considerations appear particularly relevant here given the site's relationship with Whalley and the infrastructure and environmental constraints addressed below.

The alternative station provision within S5 also appears not to apply on the applicant's own figures. The NPPF describes a reasonable walking distance for this purpose as around 800m or around a 10-minute walk, taking account of matters including route quality, topography and physical barriers. The applicant's Transport Statement places Whalley Station approximately 1.2km away, with a stated walking time of 14 minutes.

(NPPF, August 2026, S5 and glossary; Transport Statement, Mode Transport Planning, August 2026, Table 4.2.)

I would therefore be grateful if the current policy framework, rather than the superseded paragraph 11(d) analysis contained in parts of the application, could be taken into account when considering the principle of development.

2. Landscape and countryside

The site lies outside Whalley's settlement boundary within the open countryside. Landscape and character harm formed part of the first reason for refusal of application 3/2025/0588.

I accept that reducing the development from 77 to 39 dwellings has substantially changed its density and potential impact. The question, in my view, is whether that change is sufficient to overcome the underlying concern about extending built development into this particular countryside location.

The applicant describes the proposal as a “logical extension” to Whalley. I consider that conclusion needs to be viewed against the physical character of the site and its surroundings.

The northern approach to Whalley along Clitheroe Road contains open land, substantial mature vegetation and comparatively low-density development, including established properties within mature landscaped grounds. The openness and vegetation of the application site contribute to the transition between the settlement and countryside beyond.

The applicant relies significantly upon retained trees, existing mature vegetation and additional landscaping to assimilate the development. Their long-term retention is therefore important to the landscape case being made.

There would also be a change to the character of Clitheroe Road through the new estate junction, ghost right-turn lane, pedestrian crossing infrastructure, altered bus-stop arrangements and traffic-calming measures. These may be necessary to serve the development, but their cumulative urbanising effect is extremely relevant when considering the character of this approach to Whalley.

The noise strategy also requires 2.5m acoustic barriers in certain locations. These are substantial structures which are relevant to the visual as well as acoustic consequences of the proposal. (Road Traffic Noise Assessment, Martec Environmental Consultants, July 2026; Boundary Treatments Plan 24-124-BT01 Rev C.)

My concern is therefore not simply that the site lies beyond a settlement boundary, but whether the development, together with the infrastructure required to serve it, can be assimilated into the established countryside setting.

3. Accessibility and highways

The application describes the site as highly accessible and presents walking, cycling and public transport as realistic alternatives to private-car use. This is grossly overarching.

The Transport Statement records that the existing footway is located only on the western side of Clitheroe Road, that there are currently no cycle facilities and that the proposed access lies within the existing 40mph section of the road.

(Transport Statement, Mode Transport Planning, August 2026, Table 2.1 and paras. 2.3.6–2.3.7.)

Residents walking towards Whalley would therefore need to cross 40mph (of which cars travel much faster) Clitheroe Road to join the existing pedestrian route into the village.

The development therefore proposes new crossing/refuge provision, traffic calming, a proposed 30mph environment, a ghost right-turn lane and shared pedestrian/cycle provision around the access.

These measures demonstrate that the site's claimed accessibility is wholly dependent upon new major highway intervention rather than existing conditions. Interventions that I also do not see to be possible given the width of the road and positioning of the opposing neighbours driveway entrance. I consider this relevant to the S5 question of whether the site is physically well-related to Whalley.

The Transport Statement gives walking times of approximately 11 minutes to Whalley centre and 14 minutes to the railway station. These figures should, in my view, be considered alongside the actual quality of the route, including the need to cross Clitheroe Road, the busy main through road to Clitheroe from Whalley and surrounding areas.

Similarly, while cycling is identified as an alternative mode of transport, there are currently no dedicated cycle facilities along Clitheroe Road and the proposed shared provision is concentrated around the site access.

My concern is would the proposed crossing, visibility and speed-management measures create a sufficiently safe and attractive pedestrian relationship with Whalley given the existing highway conditions and actual vehicle speeds.

4. Flood risk and drainage

Drainage formed a specific reason for refusal of the previous application and remains one of my principal concerns.

I recognise that the site is within Flood Zone 1 for river and sea flooding. However, the Flood Risk Assessment identifies a high chance of surface-water flooding along the northern boundary, which is also the lowest part of the site. The revised layout avoids locating dwellings within this particular area.

(Flood Risk Assessment and Drainage Strategy, ReFord, July 2026.)

The wider question is whether the proposed drainage strategy can operate without increasing flood risk elsewhere.

Surface water is proposed to be attenuated before being discharged at a controlled rate to an existing manhole associated with the culverted watercourse beneath Clitheroe Road. This requires construction of a new surface-water sewer along Clitheroe Road.

The FRA concludes that because the proposed discharge is within the same catchment there will be no change to upstream or downstream flood risk. Given that drainage formed a previous reason for refusal, I consider independent confirmation of that conclusion important.

The applicant's Planning Statement acknowledges that the LLFA objection remained outstanding when the previous application was determined. It states that there is understood to be no in-principle objection to the proposed culvert connection, subject to permissions and further consideration during determination.

(Planning Statement, Maybern, August 2026.)

At the date of this representation, I am not aware of a current LLFA response confirming that drainage concerns have been overcome, however I feel the conclusions drawn in the planning statement are treating as though they are.

There has also been no site-specific infiltration testing. The FRA instead relies upon Soilscales information identifying slowly permeable clayey and loamy soils and concludes that infiltration is unlikely to be viable.

(Flood Risk Assessment and Drainage Strategy, ReFord, July 2026, para. 8.2.)

The runoff calculations use approximately 2.2ha as the contributing developed area rather than the entire 3.42ha site after peripheral landscaping is excluded. I do not suggest that either approach is necessarily technically incorrect; I mention them because of the previous drainage objection and the importance of the assumptions underlying the proposed discharge strategy.

I can also provide relevant first-hand evidence. I have personally observed regular significant surface-water flooding at the Clitheroe Road/A59 underpass during periods of heavy rainfall, directly at the proposed development access.

The applicant's Geo-Environmental Desk Study separately records surface-water modelling identifying a highest risk within 50m of 1 in 30 years, with predicted depths of approximately 0.3m–1.0m.

(Phase 1 Geo-Environmental Desk Study, section 3.6.1.)

This is why I remain concerned about the proposed outfall, the effect of discharge upon the wider drainage system and safe access during significant surface-water events. I would welcome the LLFA's current assessment of these matters before the any drainage concerns are considered resolved.

5. Noise

The site's proximity to the elevated A59 creates a significant acoustic constraint.

The submitted Road Traffic Noise Assessment classifies the site as Medium Risk during both daytime and night-time periods. It concludes that relevant internal criteria would not be achieved with windows open and proposes closed glazing and mechanical ventilation so that habitable rooms can be ventilated without relying upon open windows. Certain gardens also require 2.5m acoustic barriers.

(Road Traffic Noise Assessment, Martec Environmental Consultants, July 2026.)

My concern is whether the extent of mitigation required here is consistent with creating a satisfactory residential environment.

The applicant's Planning Statement also acknowledges that the previous application remained subject to an outstanding Environmental Health objection concerning the noise assessment and mitigation. It records continuing engagement with the EHO and states that additional information may be submitted during determination. This is yet to be seen.

(Planning Statement, Maybern, August 2026.)

For that reason, I consider the Environmental Health response to the revised proposal particularly relevant in establishing whether the previous noise concern has now been overcome.

6. Housing mix

The affordable element provides a useful range of smaller homes, comprising six one-bedroom, four two-bedroom and two three-bedroom properties. The 27 market dwellings, however, are exclusively large detached houses: 25 four-bedroom and two five-bedroom homes.
(Planning Statement and Affordable Housing Statement, August 2026.)

I recognise that Policy HO8(3) of the August 2026 NPPF now provides for flexibility regarding market-bedroom mix where a proposal meets or exceeds up-to-date affordable-housing proportion and tenure requirements. I therefore do not suggest that the market mix is, in itself, a reason for refusal.

It nevertheless appears relevant to Key Statement H2 of the Core Strategy and to consideration of the overall housing balance being delivered. I would welcome clarification within the officer's assessment as to how H2 and current national policy have been applied to the proposed mix.

7. Ecology and BNG

The Ecological Survey and Assessment records that the site contains habitat suitable for use by badgers. No sett or characteristic signs were identified during the general survey, and the report therefore considers the presence of badger setts reasonably discounted "at this stage".
(Ecological Survey and Assessment, ERAP, August 2026, para. 3.3.1.)

Within the past month I have personally observed a badger in the immediate vicinity of the site. A neighbouring resident has separately reported another recent sighting.

I do not have photographic evidence and do not suggest that these observations establish the presence of a sett or prove regular use of the application site. I mention them simply as recent local evidence which may be relevant to the ecological assessment and further surveys being carried out.

The BNG position is more readily quantifiable. The submitted assessment records 20.02 baseline habitat units and 18.00 post-development units, representing an on-site change of -10.07%. So over 10% biodiversity net gain loss. It also records that the trading rules are not satisfied and identifies a 4.02-unit deficit.

(Assessment of Biodiversity Net Gain, ERAP, August 2026, Table 5.1.)

ERAP states that the site cannot accommodate the additional trees required to satisfy the trading rules.

I appreciate that off-site BNG provision is permissible. My concern is simply that general references elsewhere in the application to ecological enhancement are false and should be read alongside the metric itself: the development results in an on-site habitat-unit loss and relies upon off-site provision to achieve the required overall gain.

Given that BNG formed a reason for refusal previously, the deliverability of the necessary off-site provision and compliance with the trading rules appear material to consideration of whether that concern is actually addressed.

8. Trees and TPOs

Mature trees and vegetation are an important part of both the existing character of the site and the

applicant's proposed landscape mitigation.

The submitted information identifies historic Tree Preservation Orders affecting the site and its surroundings, including TPO 1957 No.1 and the Bramley Meade TPO. The applicant also acknowledges some uncertainty in reconciling the historic TPO mapping with the trees now present.

The mature Lime avenue immediately adjoining the southern boundary is particularly significant. The arboricultural survey identifies these trees as approximately 25m high, Category B2 and creating an "avenue effect". Their protected status is also acknowledged.

The Arboricultural Impact Assessment identifies some interaction between the development and theoretical Root Protection Areas, with detailed construction measures intended to be addressed through an Arboricultural Method Statement.

My concern extends beyond whether mature trees can physically survive construction. New residential development in close proximity to established trees can create longer-term pressure through shading, canopy spread, leaf fall and perceived safety concerns.

That appears particularly relevant here because the existing trees and vegetation are themselves relied upon to soften the landscape impact of the development. I would therefore request consideration of whether the proposed layout provides a sustainable long-term relationship between the new homes and the mature protected trees upon which the landscape strategy depends.

9. Healthcare

The NHS Integrated Care Board estimates that the proposal would result in approximately 120 additional patient registrations and seeks a contribution of £38,880 towards expansion/reconfiguration of Whalley Medical Centre. It states that capacity should be created in advance of population growth and that failure to secure the requested contribution would amount to an objection.

(NHS Lancashire and South Cumbria ICB consultation response, September 2026.)

I consider this useful independent evidence that healthcare capacity is a genuine infrastructure consideration associated with the proposal rather than simply a perceived concern raised by residents.

10. [REDACTED]

[REDACTED], I also wish to record the potential effect upon [REDACTED]

I acknowledge that the revised development provides substantially greater separation than the former scheme. The applicant identifies approximately [REDACTED]

My concern is instead the cumulative change to the immediate setting [REDACTED] presently adjoins open land and mature vegetation. The proposal would introduce built development, domestic gardens, vehicle movements, lighting and new highway infrastructure alongside that setting.

The applicant itself identifies the southern boundary as a sensitive boundary edge. The mature Lime avenue and other vegetation provide an important component of the setting and physical separation of The Lodge and are therefore relevant to neighbouring amenity as well as landscape and arboriculture.

A detailed lighting scheme has not been submitted. Given the property's relationship with the development and new access, I would be grateful if consideration of lighting could include potential light spill and vehicle headlight glare towards The Lodge and its garden, alongside ecological considerations.

11. Supporting documents

In reviewing the submission I have noted many broad conclusions within the narrative documents appear more positive than the qualifications contained within the technical evidence.

For example, the description of the site as highly accessible should be read alongside the existing highway conditions recorded in the Transport Statement; references to ecological enhancement alongside the -10.07% on-site BNG calculation; and the conclusion regarding noise alongside the acknowledged continuing discussion with Environmental Health.

I have also noted several apparent drafting inconsistencies. The Design and Access Statement describes the proposal as providing “39 full market homes”, whereas the Affordable Housing Statement confirms the actual proposal is 27 market and 12 affordable homes.

The Planning Statement's market schedule identifies three Grantley dwellings, while the Affordable Housing Statement states that four Grantley dwellings are relied upon as adaptable market accommodation.

The Affordable Housing Statement also refers in its conclusion to “9 of the 13” affordable homes meeting M4(2), despite the proposal containing 12 affordable dwellings.

I appreciate that these may simply be drafting errors. I mention them so that the application can be considered against the verified plans, schedules and technical evidence where inconsistencies arise.

Conclusion

I recognise that the current proposal represents a substantial change from the refused 77-dwelling scheme and that the national housing-policy position has also changed. My objection is therefore not based simply upon the site's unallocated status or opposition to new housing.

My concern is whether the evidence submitted demonstrates that this particular site is an appropriate and sustainable location for 39 dwellings.

The proposed relationship with Whalley depends upon significant highway intervention to provide its pedestrian connection; drainage and noise were previous reasons for refusal and remain subject to important technical considerations; the BNG assessment records an on-site habitat loss and reliance upon off-site provision; mature protected trees remain integral to the landscape strategy; and the NHS has identified a specific infrastructure impact.

These matters sit alongside the site's open-countryside character at risk and the landscape effects of introducing a residential estate and associated highway infrastructure at this northern approach to

Whalley.

Taken together, I do not consider that the application presently demonstrates that the fundamental constraints associated with development of this site have been satisfactorily overcome. I therefore maintain my objection to the proposal.

I would be grateful if these representations could be taken into account in determining the application.

Many thanks,

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 16 September 2026 16:46
To: Planning
Subject: Planning Application Comments - 3/2026/0635 FS-Case-874518360

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0635

Address of Development: Clitheroe road

Comments: There is no infrastructure in place for more houses in this area. We currently live in whalley & have to travel for dentist. Children do not get their first choice of school as the area is saturated with new builds and no extra schools. The drains are an issue here and the village is now a town. Parking is a nightmare as well as traffic.

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 16 September 2026 17:00
To: Planning
Subject: Planning Application Comments - 3/2026/0635 FS-Case-874523055

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0635

Address of Development: Clitheroe road whalley

Comments: Do not allow this to happen. Whalley and barrow is a nice quiet town and we do not want more houses. It was refused previously and just because they are building less doesn't mean it is any better. Protect our town!

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 16 September 2026 17:38
To: Planning
Subject: Planning Application Comments - 3/2026/0635 FS-Case-874531214

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0635

Address of Development: Land east of Clitheroe Road Whalley

Comments: I object to the proposed housing development due to the further loss of valuable Green Belt land and the resulting destruction of wildlife habitats and natural landscape. The Ribble Valley is known for its stunning countryside and this another step towards removing this. I am also concerned that the development would place additional pressure on already busy roads, increasing traffic and congestion throughout the Barrow and Whalley. Furthermore, there has been insufficient care and consideration for existing residents following previous housing developments in the surrounding area, with concerns regarding the impact on local infrastructure, roads and the character of the village. This development has been strongly objected before and making changes to the proposal does not change the main driving factors for not wanting this development. I strongly urge you to dismiss the proposal. The opportunity cost is not worth it.

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 16 September 2026 18:01
To: Planning
Subject: Planning Application Comments - 3/2026/0635 FS-Case-874535329

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0635

Address of Development: Land east of Clitheroe Road Whalley

Comments: I strongly object to this development. The infrastructure in Whalley can not cope with more traffic. The village is at a gridlock at certain times of the day as people drive through on their way to and from work and school. The congestion is one thing but the noise is the bigger issue. every car that needs to access the A59 adds to the pollution and traffic noise that has increased so much over the last 15 years. in our home which is about a mile from the a59, we can now hear the road from inside our house at night. we need the fields and tress to absorb the current noise pollution , not add more concrete to exacerbate the problem. if we need houses we need them on currently built up areas, brown filed sites where units and factories are closed. there is enough housing stock in this are to serve the people of the ribble valley. Enough really is enough. our beautiful valley is being raped and plundered by allof this building work. what was attractive about living here- a quiet, semi rural area is being taken away.

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 16 September 2026 19:07
To: Planning
Subject: Planning Application Comments - 3/2026/0635 FS-Case-874551712

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0635

Address of Development: Land east of Clithero Rd Whalley

Comments: Some of the overall matters arising from original objection which residents may wish to consider include:

- The effect of developing this open-countryside changing the characteristics of the site on the landscape and the approach into Whalley including 2.5m acoustic fencing along the A59.
- Significant urban sprawl blurring the lines between villages
- Pedestrian and highway accessibility. The proposed access is currently within the 40mph section of Clitheroe Road, the existing footway is on the opposite side of the road and there are no existing cycle facilities. The development therefore proposes significant road restructure.
- Surface-water flooding and drainage. Drainage was one of the reasons the previous application was refused. If you have personal experience of flooding around Clitheroe Road or the A59 underpass, this is particularly relevant to include.
- Ecology, biodiversity and mature trees. The submitted Biodiversity Net Gain assessment records a 10.07% loss in habitat units on the site. Local observations of wildlife may also be relevant.
- Local infrastructure. The NHS has estimated that the development could generate approximately 120 additional patient registrations at an already stretched Whalley Medical Centre. Pressure on other village amenities.

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 16 September 2026 20:25
To: Planning
Subject: Planning Application Comments - 3/2026/0365 FS-Case-874566638

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0365

Address of Development: Barrow/Clitheroe

Comments: There is very little green space left, the over development of Whalley/Barrow/Clitheroe now means those areas have no clear definition. The traffic congestion caused by the overdevelopment is a real issue, in terms of vehicle emission pollution cause by standing traffic in Whalley. The services such as schools and Doctors is at breaking point. The NHS is over burdened as it is without fuelling the issue by over development by greedy developers. Enough is enough!

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 16 September 2026 22:19
To: Planning
Subject: Planning Application Comments - 3/2026/0635 FS-Case-874583630

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0635

Address of Development: Clitheroe Road, Whalley

Comments: The proposal of more houses being built in Whalley is absolutely ludicrous.

More houses takes away green belt land and the environment will lose its wildlife and greenery of which makes Ribble Valley such a huge attraction tourism wise. Plans are not in place to rejuvenate green land areas that need sprucing up to make the area nicer but the plan to remove natural beauty from the area makes sense?

The proposal is situated on a 40 mph road which is surrounded by affluent houses which give character to the area. These houses have been in the area for years and will experience significant money loss on their house valuations as a result of these properties being built that will not reflect the character of the area surrounding.

As with being on a 40 road, the road would need considerable redoing which costs significant money, causes nuisance to the locals trying to commute to work, schools or even just home. Why should they experience further traffic? The influx of traffic on the road would dramatically increase to a point where the area cannot cope and would need constant maintenance and repair to ensure they meet needs. The roads around the Langho roundabout are already experiencing terrible pot holes due to the influx of traffic due to homes being built more and more for people who only want to live in the Ribble Valley if it's a new home.

Focus on regenerating areas that need it than building more houses. The Ribble Valley does not need additional housing, it needs to keep its character and charm that is created by the environment surrounding it and the local people who keep the community going.

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 17 September 2026 06:59
To: Planning
Subject: Planning Application Comments - 03/2026/0635 FS-Case-874615859

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 03/2026/0635

Address of Development: Land east of clitheroe road, Whalley.

Comments: I wish to object to the proposed housing development on land adjacent to Clitheroe Road, Whalley. The site forms part of an important local habitat supporting a range of wildlife, and further construction would cause irreversible disruption to these ecosystems. The development would also add significant traffic to an already congested road network, increasing safety concerns and reducing air quality. Whalley's existing infrastructure is already under strain, with schools, GP practices and dental services operating at or near capacity. Introducing additional housing without any realistic provision for expanded public services would place unsustainable pressure on the community.

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 17 September 2026 07:03
To: Planning
Subject: Planning Application Comments - 03/2026/0635 FS-Case-874616592

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 03/2026/0635

Address of Development: Land east of Whalley road, clitheroe.

Comments: I wish to object to the proposed housing development on land adjacent to Clitheroe Road, Whalley. The site forms part of an important local habitat supporting a range of wildlife, and further construction would cause irreversible disruption to these ecosystems. The development would also add significant traffic to an already congested road network, increasing safety concerns and reducing air quality. Whalley's existing infrastructure is already under strain, with schools, GP practices and dental services operating at or near capacity. Introducing additional housing without any realistic provision for expanded public services would place unsustainable pressure on the community.

[REDACTED]

From: [REDACTED]
Sent: 18 September 2026 13:32
To: Planning
Subject: 3/2026/0635

⚠ 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.

I am emailing as opposed to online objecting to the above proposal as whilst your system recognises the post code, there are no additional drop downs with street addresses.

Despite the fact that this new application has reduced the overall number of properties, I still object to this development for the following reasons:-

It opens onto a busy main road with a speed limit of 40mph There are no pavements on this side of the road There is no requirement for additional housing of this nature in Barrow or Whalley Clitheroe, Barrow and Whalley are all being merged into one with a huge reduction in green space There will be a detrimental environmental effect to the wildlife, flora and fauna on this land The area of the road is prone to heavy flooding and all these new houses will worsen that as the run off has no where to go There are no proposed increased facilities in the area from an NHS, schooling, and general health and welfare and the current offerings are already full to capacity

We cannot continue to see the nature of the villages of Barrow and Whalley eroded and merged into one for greedy developers. We need to protect our open green spaces and on the ground of all the above, I strongly object to this development being approved. Despite the reduction in number of properties, this development will still have the same impact on all the areas it was rejected in the first place.

Regards

[REDACTED]

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 19 September 2026 10:44
To: Planning
Subject: Planning Application Comments - 3/2026/0635 FS-Case-875209599

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0635

Address of Development: Land East of Clitheroe Road Whalley

Comments: Highway Safety

Getting in and out of the proposed development would be very hazardous, both for drivers and pedestrians. I think that the issue is that the traffic calming proposals look very reasonable when looked at on a plan. The plan doesn't show the impact of the embankment built to support the A59, which makes the entrance/exit blind to traffic approaching from Barrow. The Traffic Statement recognises that 15% of traffic exceeds the speed limit; I don't see the calming proposals being remotely enough to stop the accidents that this 15% of drivers will risk. I note that the Transport Statement uses the lack of PIC data to support the safety of the proposal. There are no recorded incidents because no one needs to cross here. That would change if the development goes ahead, which will risk frequent incidents. For all practical purposes, I don't believe that it is possible to create a safe traffic solution for a development on this site that requires an access on Clitheroe Road.

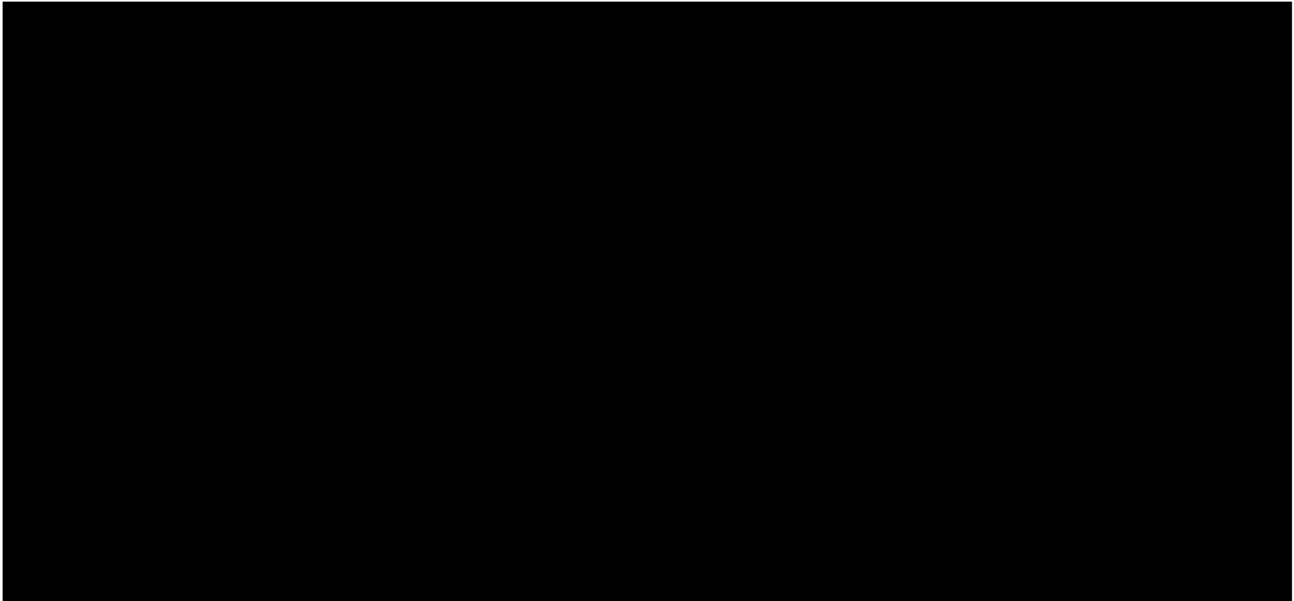
Ecology
Predictably, the Ecology Survey and Assessment makes much from desk top analysis and the consideration of the suitability of the habitat for particular types of wildlife. Having lived near the site for nearly thirty years, I can assure the Committee that this is an important corridor for all kinds of wildlife.

I note that the Design and Access Statement concludes that the 'presence of Badgers is reasonably discounted'. This is simply not supportable. Walking past the site about 6 months or so I saw a dead badger lying next to the old gate that is the current entrance to the site. I also see them in my garden, 200m from the proposed development. They are not solitary animals, so these sightings over the years point to a thriving badger presence in the area that the development is highly likely to interfere with.

I haven't seen bats on the proposed development site, but since I see them regularly in my garden it seems highly improbable that they wouldn't also be using the site.

Infrastructure Strain

It goes without saying that the significant developments already built, and still being built, in Whalley and Barrow are putting unbearable strain on all the infrastructure in the village. To add to this further would be ludicrous. There have been no new schools, GP practices, roads, village parking etc to absorb the growth in population. The existing provision is just being pushed closer and closer to breaking point.



FAO planning case officer

Planning Department
Ribble Valley Borough Council

By email: 25th September 2026

Dear Planning,

RE: Application 3/2026/0635 Full Planning Application for the Erection of 39 Dwellings with Associated Access, Gardens, Parking and Landscaping areas.

This letter represents a formal objection to the above application on behalf of 

Background

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the adopted development plan, unless material considerations indicate otherwise. These requirements are repeated within the National Planning Policy Framework (NPPF 2026) which sets out the Government's planning policies and details how they should be applied.

This objection relates to both the principle of development and a number of associated material considerations, which will be outlined and expanded upon in this response. The objection letter goes through the 6 reasons of

refusal in the previous application 3/2025/0588 and concludes that there are still policy compliance issues with the current application.

Relevant Planning Policies

Key Statement DS1: Development Strategy
Key Statement DS2: Sustainable Development
Key Statement EN3: Sustainable Development and Climate Change
Key Statement EN4: Biodiversity and Geodiversity
Key Statement H1: Housing Provision
Key Statement H2: Housing Balance
Key Statement H3: Affordable Housing
Key Statement DMI2: Transport Considerations
Policy DMG1: General Considerations
Policy DMG2: Strategic Considerations
Policy DMG3: Transport & Mobility
Policy DME1: Protecting Trees & Woodland
Policy DME2: Landscape & Townscape Protection
Policy DME3: Site and Species Protection and Conservation
Policy DME5: Renewable Energy
Policy DME6: Water Management
Policy DMH1: Affordable Housing Criteria
Policy DMH3: Dwellings in the Open Countryside and AONB

National Planning Policy Framework (NPPF) 2026

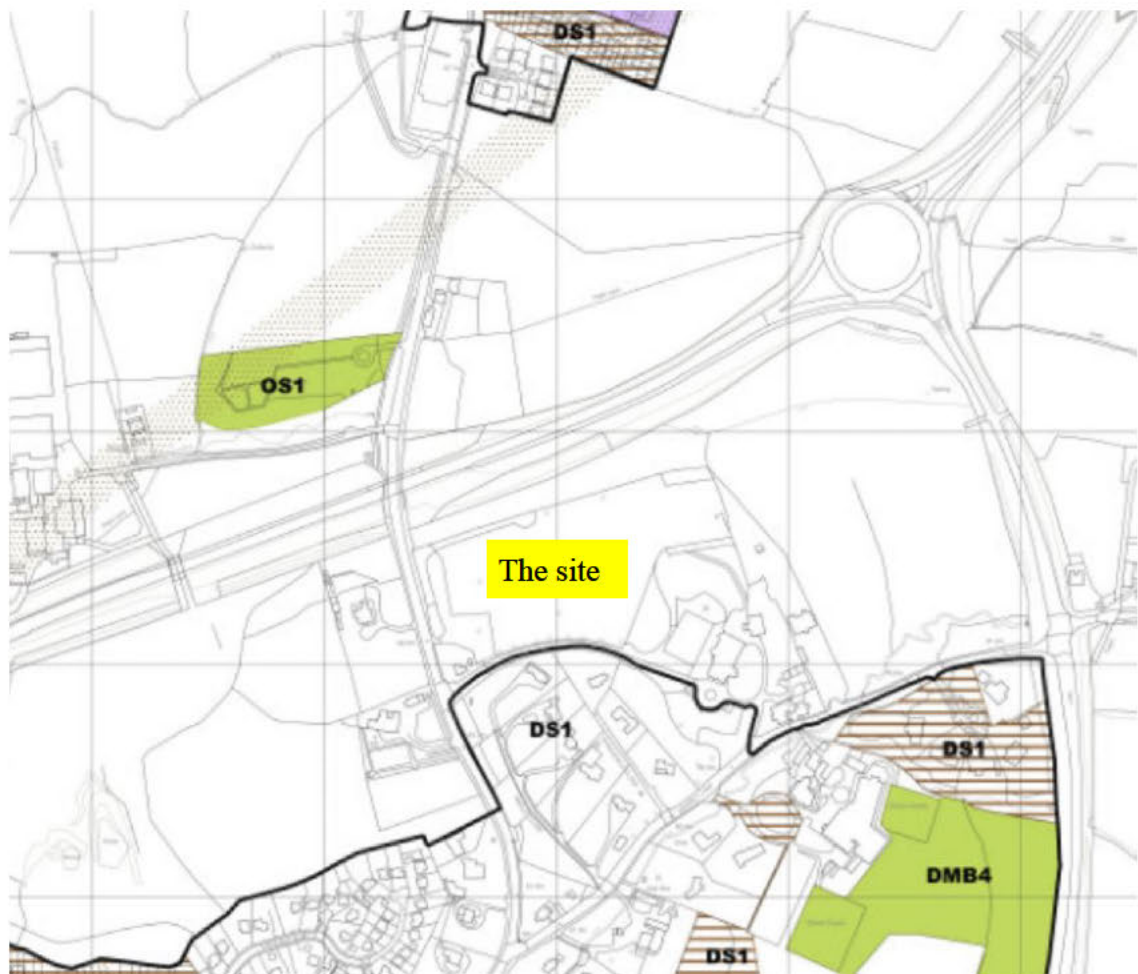
It is noted that the supporting planning statement for the submission does not take account of the new August 2026 NPPF.

The principle of development

The site lies outside the defined settlement boundary of Whalley in an area of open countryside. Policies DMH3 and DMG2 of the RVCS apply in the assessing the principle of development.

Policy DMG2 – Strategic Considerations

Policy DMG2 of the Ribble Valley Core Strategy seeks to restrict residential development within the open countryside (or outside of defined settlement limits) and Tier 2 Village settlements to that which meets a number of explicit criteria. Key Statement DS1 also reaffirming these criteria and sets out the overall spatial aspirations for development within the Borough.



Map extract taken from the HED proposals map showing the site outside the development boundary in Open Countryside

Policy DMG2 is two-fold in its approach to guiding development. The primary part of the policy DMG2(1) applies to development within the principal settlements of Clitheroe, Longridge and Whalley. This does not apply to this site given it is not within the defined settlement (see extract plan above).

The second part of the policy DMG2(2) applies when a proposed development is located 'outside' defined settlement area or within tier 2 villages. 1-6 of this part of the policy lists exceptions when development could be appropriate. Part 3 of the list states, '*the development is for local needs housing which meets an identified need and is secured as such.*'

The definition of 'local needs housing' as defined within the Ribble Valley Core Strategy which states that '*Local needs housing is the housing developed to meet the needs of existing and concealed households living*

within the parish and surrounding parishes which is evidenced by the Housing Needs Survey for the parish, the Housing Waiting List and the Strategic Housing Market Assessment’.

The proposed development would bring forward 12 affordable homes (30% of the total site) and 27 open market housing. is attempting to use the ‘local needs housing’, and for the reasons set out below, it is not considered that the proposal complies with DMG2.

Policy DMH1 - Affordable Housing

Policy DMH1 is clear in setting out the criteria in which affordable homes within the Borough will be provided for:

Where proposals involve the provision of affordable housing units, the residential development must be expressly for the following groups of people:

- 1. First time buyers currently resident in the parish or an adjoining parish*
- 2. Older people currently resident in the parish or an adjoining parish*
- 3. Those employed in the parish or an immediately adjoining parish but currently living more than 5 miles from their place of employment*
- 4. Those who have lived in the parish for any 5 of the last 10 years having left to find suitable accommodation and also with close family remaining in the village*
- 5. Those about to take up employment in the parish*
- 6. People needing to move to the area to help support and care for a sick, older person or infirm relative.*

Affordable Housing Needs (AHNA) Assessment May 2025

This recently published evidence base document has been endorsed by the Council and is to be used in the determination of planning applications such as this. This document and it’s findings were used in the determination of the previous planning application.

The report covers the main issues/topics; area profile, affordable need, need for difference sizes of homes and older and disabled people.

Paragraphs 16 – 23 of the report describes the estimated annual need for affordable housing with a break down of the need by sub areas, including Whalley:

Figure 4: Estimated level of Affordable Housing Need by sub-area (per annum)						
	Current need	Newly forming house-holds	Existing house-holds falling into need	Total Gross Need	Relet Supply	Net Need
Clitheroe	22	56	10	89	40	49
Longridge	13	28	6	47	11	36
Whalley	6	13	2	21	8	13
Tier 1 villages	20	43	5	69	19	49
Rest of District	33	55	10	98	15	83
TOTAL	95	194	34	323	93	230

Source: JGC analysis

As the table states, there is an estimated need for 13 dwellings per year in Whalley. Paragraph 23 of the report clearly states that *'this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided.'*

As detailed below, there are still on going builds in Whalley which contribute towards the affordable housing need figure. The applicant has put forward some figures for affordable housing completions in the Whalley and Painter Wood ward, but these are questionable and need to be checked with the Council's housing and monitoring team.

Committed Affordable Homes in Whalley

Whalley Manor development in Whalley (3/2018/0914) includes 57 affordable dwellings out of a total 188 homes on this phase of development. The number of affordable homes is proportionate (30% of the overall total) to a wider mix across the site. This takes forward the aim of the NPPF and the Councils main ambitions to have a mix of housing across a development.

In the Council's latest 5YHLS it states that there are 50 completions on this site as of March 2025, with 83 remaining. If you were to compare the latest evidence from Affordable HNA 2025 which states that Whalley has a need for 13 units per year, then Whalley Manor development alone will provide just over 4 years of the suggested need.

Abbey Farm View, Whalley

The case for housing provision in Whalley is different to the main case which the applicant puts forward at Crowtrees Chatburn in which there hadn't been any affordable housing developed in over 25 years. In Whalley and its surroundings, there has been a steady supply of affordable housing units completed on new housing developments over the years such as Abbey Farm View, off Mitton Road (David Wilson Homes) where 41 affordable units have been created out of a total of 116.

Nab Rise, off Billington Road

Nab Rise was a development of 56 units a short walk from Whalley developed out by McDermott Homes. A suitable affordable mix was implemented on the site of 15 units.

Dogwood Lane, Barrow (Redrow Homes)

Application 3/2017/0064 granted reserved matters for one of several parcels of land off Whalley Road, Barrow. This phase has a total of 183 dwellings with 57 of these being affordable.

Previous reasons for refusal 3/2025/0588

Reason 1 – development outside settlement boundary

The proposed development would result in the introduction of an incongruous and discordant form of development within the Open Countryside that fails to respond positively to the inherent character of the area contrary to Policies DMG1 and DMG2 of the Ribble Valley Core Strategy and paragraph 187 of the National Planning Policy Framework.

The application site remains outside the settlement boundary and remains contrary to policies DMG1 and DMG2.

The new NPPF sets out clear policy in S5 (Principle of development outside settlements), and it is not considered that any of the exceptions a-j have been met. The applicant's planning statement does not address the new policy S5.

The NPPF puts forward an exception at h)

h. Residential and mixed-use development which would:

- i. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B);*
- ii. Be physically well-related to the station or the settlement within which the station is located;*
- iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and*
- iv. Not prejudice any proposals for long-term comprehensive development in the same location.*

Well connected station (see glossary) does not fall into one of the 80 Travel to Work Areas. Furthermore, the station is located over 1km on foot from the train station.

Reason 2 – poor design

The proposed development would represent poor design, by virtue of the cramped grid layout with insufficient spacing between buildings and between buildings and the street, dominance of frontage parking, hard development edges, lack of architectural detailing and variety, lack of useable and accessible public open space, and failure to give due consideration to protected trees on and adjacent to the site. This is contrary to Policies DMG1, DMB4 and DME1 of the Ribble Valley Core Strategy and paragraph 135 (a-f) of the National Planning Policy Framework.

The proposed layout pays no respect to the immediate area which is characterised with larger housing plots with generous garden areas and abundance of mature trees and hedgerows. Most importantly this stretch of road provides a natural break in the built form from Whalley to Barrow, something which was highlighted as part of an appeal decision discussed below. The layout presents itself as an overly dominant sprawl into the open countryside, and is more characteristic of a suburban housing estate.



The NPPF policy DP3 (key design for well-designed places) is clear that;

‘Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings’; page 66

By virtue of the scale and complete discord with the character of the area, it is not considered that the proposed development complies with the NPPF. Furthermore, the development will be in conflict with policy DMG1 which requires development to *‘be sympathetic to existing and proposed land uses in terms of size, intensity, nature, scale and massing.’*

Relevant appeal comments on design and appearance

Appeal Ref: APP/T2350/W/15/3005882 Meadcroft, Clitheroe Road, Whalley, Clitheroe, BB7 9AD (App ref 3/2024/0684) Appeal dismissed

In July 2015 an appeal was dismissed for 9 new dwellings on land approximately 100m to the north of the site. The key issues were the suitability for housing on the site (the Council at the time had a 5.15 housing supply and a newly adopted Local Plan) and character and appearance. These two sites are separated only by the A59 bridge, otherwise they have a very similar road frontage. Note the Inspectors comments on the character and appearance just on 9 dwellings, whereas the proposed development is 39, making the impact on character and amenity even greater.

Given the close proximity of the proposed Pringle Homes site, the assessment made by the Inspector at the time on the character and appearance is considered to be relevant.

‘In this location, and situated in between Barrow and Whalley the erection of 9 new dwellings would be visually divorced from either settlement.’
Para 17

‘I consider that it would erode the open area between the two settlements’.
Para 18

‘I therefore conclude that by reason of its detached location and prominence from Clitheroe Road the proposal would not be sympathetic to its surroundings and would harmfully detract from the character and appearance of the area. As a result, it would conflict with Core Strategy Policy DMG1 which, amongst other things, states that all new development must be sympathetic to existing and proposed land uses in terms of its size, intensity and nature.’ *Para 21*



Panoramic photo of the site and frontage along Clitheroe Road

Reason 3 – mix of housing

The proposed development would not sustain an appropriate mix of housing, in particular the application fails to demonstrate how the requirement for older persons accommodation would be met. This is contrary to Key Statements H2 and H3 and Policy DMH1 of the Ribble Valley Core Strategy.

The current scheme offers a broader mix of housing type and tenure, however, there remains to be evidence that Whalley has already met its affordable homes target through committed sites which are currently still being built and which might not have sold yet.

Reason 4 - flooding

The site is at risk of surface water flooding and the application has failed to demonstrate that an appropriate sustainable drainage strategy can be achieved on the site contrary to Policy DME6 of the Ribble Valley Core Strategy and paragraph 182 of the National Planning Policy Framework.

The application has been supported with Flood Risk Assessment and Drainage Strategy. These documents will need to be reviewed by the LLFA.

Note in application 3/2025/0588 the LLFA objected to the application. It is not clear in the submission that the concerns can be overcome so drainage should remain a reason for refusal for this application.

Reason 5 – Road Noise

The applicant has failed to demonstrate that future users of the development would not be at risk from unacceptable road noise levels associated with the adjacent A59 and Clitheroe Road. This is contrary to Policy DMG1 of the Ribble Valley Core Strategy and paragraph 187 of the National Planning Policy Framework.

The application has been supported with a Road Traffic Noise Assessment. This will be reviewed and assessed by the Environmental Health team at RVBC.

Previous officer report

‘Therefore, the proposal, as submitted, has failed to demonstrate that the proposed development would not result in any potential noise nuisance to the future occupiers of the residential units and that any satisfactory mitigation measures can be provided. In this respect the proposal fails to accord with Policy DMG1 of the Ribble Valley Core Strategy and paragraph 187 of the NPPF.’

The specialist report carried out by Martec concludes that there will be a ‘medium risk’ for both daytime and nighttime noise, and suggested conditions are put forward to mitigate the noise. Medium risk has also been raised in this current application, therefore it is not clear that the applicants have addressed the issues and therefore Road Noise should remain a reason for refusal.

Reason 6 – loss of trees and habitat

The proposed development would result in the loss of existing habitat and individual trees, with insufficient details being submitted to demonstrate an appropriate strategy for achieving the statutory requirement for Biodiversity Net Gain contrary to Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).

As noted in the officer’s previous report ‘the development will result in the loss of some of the mature trees and hedgerows on the site....some are category C trees and protected under the appropriate TPO’s above. There is also concern that some of the trees to be retained are in close proximity to the built form of the development and proposed paths and patios would infringe on the Root Protection Areas.’

The red edge boundary of the development remains the same, and it appears on the proposed site layout plans that garden area and patios still abutt close to the RPA's of some of the mature trees which are TPO's. Page 15 of the applicants planning statement lists all the trees which would be lost through the development, and even though some of the trees have been deemed to be in poor condition and a 3-1 tree replacement ration has been put forward, this does not account for the loss and the impact on the character of the area.

Concerns remain, that the RPA of some of the trees will be compromised especially along the southern and eastern boundaries, where some of the proposed housing is shown to be right up to the fence line. It is considered that the proposed development will not comply with Policy DME1 (Protecting Trees and Woodlands), which amongst other considerations seeks to ensure that; *'the visual, botanical and historical value together with the useful and safe life expectancy of tree cover, are important factors in the determining planning applications.'*



TPO trees which line the driveway



Trees along the eastern boundary, some are only 1-2m away from the proposed development

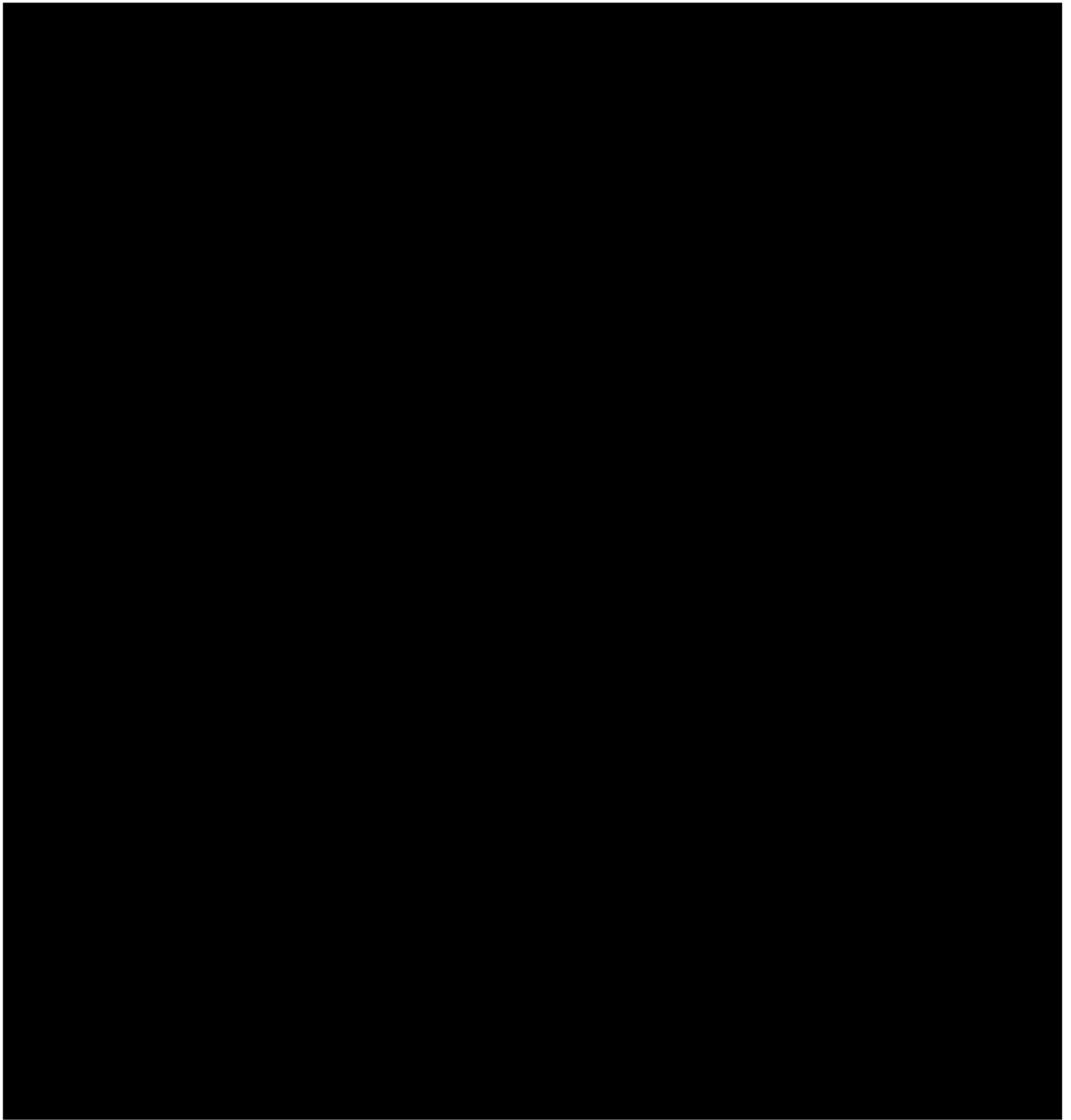
Other material considerations

Impact on the residential amenity

The site is bound on three sides by residential development. [REDACTED] to the [REDACTED]. The entire length of the southern boundary is the main access drive to the property which has a characteristic avenue of TPO trees, framing the driveway and then opening out to the currently open field to the north.

Whilst there may be adequate distance from a privacy perspective between [REDACTED] the proposed dwellings, the proposed [REDACTED], at some points there will [REDACTED]. The [REDACTED] which [REDACTED]. The use of this space [REDACTED]. The site levels [REDACTED].

It is considered that the proposals will conflict with Policy DMG1 by virtue of a direct, unsympathetic and overbearing impact of the proposed development on the residential amenities enjoyed by the residents of [REDACTED].



Conclusions

The principle of development at this site presents conflicts with the policies stated below and the requirements of the Framework to create high quality, beautiful places which make effective use of land whilst safeguarding and improving the environment.

In summary the application should be refused for the following reasons;

1. Not disputing the Council does not have a 5 year supply of housing, there are other material planning considerations as set out in this letter, which outweigh the potential contribution to housing numbers for the borough. The development remains contrary to policies DMH3, DMG2, DS1 and Key Statement 2 and SP4 of the NPPF.
2. Development of this scale would compromise the rural character and appearance, contrary to policy DMG1.
3. The development would create an urbanising feature encroaching into the open countryside on a parcel of land which creates a natural break between Whalley and Barrow.
4. The proposals will conflict with Policy DMG1 by virtue of a direct, unsympathetic and overbearing impact of the proposed development on the residential amenities enjoyed by the residents of Bramley Meade Hall.
5. The proposals will result in the unnecessary loss of mature trees which offer value to character and biodiversity of the area. There are also concerns about the impact of trees on the adjacent land which have not been taken account of in the proposed layout.
6. Increasing pressure on the social infrastructure, which is already at capacity, including health, schools and roads.

Yours sincerely

_____)

Re-Planning Application

No. 3/2026/0635

Ribble Valley Borough Council

24th September 2026

LETTER OF OBJECTION

Introductory Comments-

[REDACTED]
[REDACTED]. We write to object to the grant of planning permission with regards to Planning Application 3/2026/0635, land east of Clitheroe Road, Whalley (Applicant Pringle Homes).

The following are some of the reasons why Planning Permission should not be granted to this proposed development. Although there has been a reduction in the number of houses and changes to the development proposed in Planning Application ((3/2025/0588) many of the original reasons for opposing the planning application remain unchanged.

Outside settlement Boundary-

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

It is open countryside and is not designated in the local development plan. Indeed, The Ribble Valley Borough Council website clearly states that The Ribble Valley Core Strategy aims to

protect open countryside from development. In fact, the same website declares that protecting the Borough's open countryside is a "top priority".

Loss of privacy to our home-

This considerable development of 39 homes will cause a significant loss of privacy to our own home, many of the [REDACTED].

The development will impact on our ability to enjoy our home and garden due to factors like increased noise, smell, loss of privacy, or other disturbances due to 39 homes suddenly appearing directly along much of our property boundary e.g. the driveway we use, and the garden our family uses.

Our house is elevated above the proposed development, the light from the development would certainly be an issue for our property too.

Proximity to protected trees within our boundary-

The tree impact assessment seems to fail to acknowledge/identify the fact that the trees along the southern and eastern boundaries of the proposed site are subject to Tree Preservation Orders and the proposed layout will interfere with the root systems of the trees along those boundaries. In particular there are several trees (which have TPO's) directly adjacent to the East boundary of the site (in very close proximity to proposed housing) which have not been acknowledged in any way whatsoever- it is as though they don't exist.

This has been acknowledged within the Council's grounds for refusal on the last planning application for 77 affordable homes. It highlights the Applications 'failure to give due consideration to protected trees on and adjacent to the site'. This has not changed, many of the relevant trees on our site have just been completely ignored.

Wildlife and Agricultural Land-

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

The land in question is agricultural land, that is regularly cropped and grazed. Not vacant or unused as suggested by the application.



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



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

Impact on the character and appearance of the area-

The design/style of this development is visually incompatible with the surrounding area. This substantial development of 39 houses does not align with the surroundings and or houses in close proximity, which are larger, often period properties, some of which are historical in nature. They are spaced well apart and set within their own grounds.

The photographs on The Design and Access Statement (revision C) of surrounding houses are NOT the surrounding houses at all, these are new build houses in the area, not the properties adjacent to the proposed plot. It is a very misleading representation, these houses are not particularly close to the site and are in no way similar to the surrounding individual properties, many of which are period in nature.

This potentially overdeveloped piece of land is completely incongruous with the adjacent low density housing within the periphery of Whalley. This lack of visual coherence is thus detrimental to the character/appearance of the area.

Negative impact on local amenities and infrastructure-

The local GP surgery is massively under pressure, it is not uncommon to have to wait a month for a non-urgent GP appointment. I have had to take my teenage daughter to a local urgent care department, with medical needs that should have been easily dealt with at the Surgery. This situation will only get worse when the houses with full planning permission are built, houses in the process of being built are completed, and houses currently on the market are sold!

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

The current situation heavily contradicts The Core Strategy objective that-

“..high quality services which meet the needs of the Borough communities and support their health, social and cultural wellbeing will be protected and enhanced”.

Road Safety and Traffic Congestion-

██████████ made the choice to leave home earlier and take a longer route (via Wiswell Lane) ██████████ in Whalley every single day to avoid crossing Clitheroe Road, due to safety concerns. At this time the road is very busy, with many cars ignoring the speed limit. It is not a safe part of the road for ██████████ to cross as cars appear very quickly around the bend. There is not even a public footpath on this side of the road.

Another potential 125 cars on the roads (plus delivery vans etc.. which are undeniably a part of every day life) means this situation is only going to get considerably worse. Adding a junction here would create more congestion, hinder vision, in other words make this area of road more susceptible to accidents. However, it isn't just cars once the development is completed that can affect road safety, it is the vehicles, many large, used in the building of the development.

Additionally, in recent weeks a planning application for a 38 bedroom hotel has just been granted. This is on the opposite side of the road to this development and is literally approximately 200 yards from the development entrance. Obviously significantly increasing the number of cars and delivery vehicles etc... utilising this same stretch of road and adding to the risk of accidents and negatively impacting on road safety.

Similarly, Middleshaw Care Home (66 bedrooms), with associated visitors, staff etc.. opened in 2025, this will also contribute significantly to traffic. It is also on Clitheroe Road, sitting on the exact same stretch of road (approx. half a mile apart) from this development.

The National Planning Framework (para 116) states the development

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

I put it to the Council that this is the case, risks would inevitably be exacerbated if planning permission was granted. There was indeed an accident on Clitheroe Road a couple of months

ago, in which a car pulled out from Wiswell Lane (presumably fast to beat oncoming traffic) and mounted the pavement, then crashed into the wall belonging to one of the houses. This was approximately 100 metres from the proposed site! The consequences could have been catastrophic if there had been a pedestrian. Similarly, there was a two-vehicle collision on Sydney Ave./Accrington Road on September 10th 2026, three fire engines attended and one casualty was taken to hospital via ambulance.

The roads have got busier and more congested since traffic was monitored in 2024.

The impact on Whalley is SEVERE – on one occasion a car has even gone through a shop window in the centre of Whalley, this was, and still is, a heavily pedestrianised area. Whalley is a village, the amount of cars on these village roads is excessive and becoming unsafe. It is heavily pedestrianised, not just by residents but by the many visitors too.

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

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

Flooding

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

Anti-social Behaviour and Crime-

There has been much well publicised (the BBC news website, The Guardian and many more) “trouble” in Whalley over recent months and years, including drug problems, anti-social behaviour etc... (I regularly witness anti-social behaviour myself). Unbelievably, Mounted Police can be seen in the village centre on a weekend. Local Services and the Police etc... are obviously struggling to contain drug issues/anti-social behaviour despite many attempts to do so.

Adding more homes to the village is just going to add to the deteriorating situation. I worry that in years to come people will look back and wonder why/how the Ribble Valley has become completely unrecognisable.

The 5 Year Housing Supply Document

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

To Conclude-

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

Whalley is already losing its identity as a village. This planning application purely seems to be taking advantage of the current political climate and populist planning legislation at the cost of all other recognised valid planning issues and the very real needs and experiences of the residents of Whalley. It seems a blatant attempt to shoehorn an inappropriate development into a completely inappropriate site.

This is a very large development of 39 homes and it would be naïve (even reckless) to underestimate the significant impact on a community/infrastructure that is failing to cope. There are many valid reasons this development should not be granted planning permission.

We are addressing the local housing needs with the many houses that already in the building “pipeline”. There are many newbuild houses in Whalley that have not yet sold, not yet been completed and not yet even started building, yes – many unsold houses! Surely these should be taken into account when we are considering building more houses on a completely inappropriate site outside the Settlement Boundary. Also, there are many new housing developments in the immediate vicinity, including several in Barrow and Billington. Why are we intent on saturating the market further and irretrievably ruining what little, wonderful countryside we have left in the process. Whalley is a beautiful part of the Ribble Valley. Why is it being forced to disproportionately absorb many more new housing developments than anywhere else in the Ribble Valley? Enough is enough.

Yours Sincerely,



Dear Kathryn,

OBJECTION - 3/2026/0635 – Land to East of Clitheroe Road, Whalley

I am writing to formally object to the above mentioned application made by Mr Fleuriot of Pringle Homes on land [REDACTED]

[REDACTED] We objected to the previous scheme which was refused last year and many of the same problems with that one are carried over into the current application. The site lies outside of the Settlement Boundary and is unallocated land used for agricultural purposes, it is not as insinuated by the applicant unused vacant land. These two matters should generally be sufficient to protect the site from development; however, the new application seeks to ride in off the back of recent Appeal Decisions and the new August 2026 NPPF. Added to which I note Pringle have appealed the previous Refusal which seems to me an attempt to pressure the Planning Authority to approve this application to avoid fighting an Appeal. Whilst this is a legitimate tactic it seeks to exploit the lack of resource available to Officers of the Council and it seem to me to be an attempt to subvert the democratic process and does not place the Applicant in a good light.

Policy Objections

1. That the application is founded on the requirement to provide affordable housing in Whalley.
2. That the provision of affordable housing provides an escape route from the restriction to develop the open countryside under the planning policy framework.

Dealing with these points in turn.

Need for affordable housing

The requirement for affordable housing is not itself a local need. This is an important distinction because the requirement for affordable housing is in fact a general housing need. The references in policy that refer to exceptions for local need does not immediately translate to an exception for a housing need. In short, the applicant has erroneously conflicted the two terms of local need and housing need.

In order for the exceptions to policy that rely on the terminology “local need “, the applicant would have to demonstrate how a need has risen locally (i.e. in the immediate vicinity of the area) and how the proposal meets that identified need. That exercise has not been undertaken in the supporting documents, given that the applicant has conflated the terms housing need to equal local need. Put bluntly, housing need is not **LOCAL** housing need so should not override policy prohibitions on the development of this site. The local position is clear at the L&Q Laurus Homes Whalley Manor scheme there are numerous unsold affordable homes and they have remained unsold for a considerable period of time.

Relevant policy

The applicant's case is founded on policy DMG2 headed "strategic considerations".

They rightly point out that DMG2 split is into broadly two parts, with the first part relating to development proposals within the principal settlements of Clitheroe, Longridge and Whalley and Tier 1 villages. The requirement is that development in these locations should relate to the main built-up areas and ensure it is appropriate to the scale of and in keeping with the existing settlement.

The second part of DMG2 relates to the remaining defined settlement areas known as Tier 2 villages. There, the policy then sets out a number of considerations at least one of which must be met by development outside the defined settlement areas of the Tier 2 villages.

It is here that I think the applicant is making a further error, namely that affordable housing need across the borough can be interpreted as a local need, then the applicant is still wrong by justifying its case that policy DMG2 allows for exceptions for affordable housing.

This is because the definition of terms is contained at policy DS1, which is headed key statement and "development strategy". Policy DS1 states that the majority of new housing development will be concentrated within a defined strategic site in the principal settlements of Clitheroe, Longridge and Whalley.

The policy then says that in addition to the strategic site and the principal settlements as defined above, development will then be focused towards 32 defined settlements. In turn, those 32 defined settlements are split into two categories known as Tier 1 and Tier 2. Tier 1 contains 9 villages, and Tier 2 the remainder 23.

In other words, policy DS1 uses the words "defined settlements" to mean the villages within both categories.

Returning to policy DMG2 it states the following at part 2, being the part heavily relied upon by the applicant:

"Within the Tier 2 villages and outside the defined settlement areas development must meet at least one of the following considerations..."

It follows that the reference in this second part to DMG2 to "the Tier 2 villages" and "outside the defined settlement areas" is either a reference explicitly to the "Tier 2 villages" or to the 32 defined settlement areas to which policy DS1 addresses itself.

If the criteria at policy DMG2 were to apply to all the settlements, namely the principal settlements as well as the 32 villages, then it would say so. It does not say that.

Appeal Decision APP/T2350/W/20/3248156

This appeal was on land contiguous with the application site and shares very many of the same physical and policy considerations. The Council as you know refused this application and the Inspector upheld that decision on Appeal. You will know far better all the circumstance of that Appeal so I shall not regurgitate them verbatim but the lack of connection to the settlement, the lack of footpaths, the density of the proposals on what is effectively open greenfield on the rural fringe of the village, all such characteristics are shared with this site. There has been no attempt to reflect the local vernacular despite what the Design and Access statement says, instead the scheme at Northcote has been rehashed and trotted out again.

Drainage

The updated report indicates that an infiltration solution is unlikely to be suitable for this site despite not undertaking any actual testing so on-site attenuation will be provided. However, what was red-flagged last time on the refusal was that the applicant had not secured an offsite connection point for surface water drainage, the nearest point was some 110m away on the opposite side of Clitheroe Road and that would involve a third-party landowner. Without certainty of a connection, I cannot see how this latest application can be acceptable. Similarly, the Flood risk report again fails to address the flooding that affects this site proposed entrance and running back along Clitheroe Road under the A59 Bridge. Any resident can tell you that the road floods and with regularity in periods of sustained rainfall, something we are all told we should expect increasingly frequently. Whether this is the fault of a blocked or inadequate highway drainage or something more significant the report makes no mention.

Arboriculture and Ecology

Somewhat belatedly the tree report picks up the Tree Protection Orders on site, something the previous report failed to identify. Still, it seeks to diminish the importance of this statutory protection by saying the Orders are now very old. With the previous track record, I struggle to accept the validity of the report. Older and often decaying tree provide a perfect habitat for many species, I would have expected many should have been classified as veteran trees deserving of additional protections. In terms of Ecology again very little has been identified and the site is characterised as low level agricultural or just vacant land, it is in fact a green field with a well establish field boundaries that connect with adjoining open countryside and acts as a haven for protected wildlife, bats and badger are frequently spotted and along with regular sightings of deer, buzzards and woodpeckers that clearly utilise this land as they commute around the North of the village.

Highways

The new submission consists of a copy and paste of the previous report submitted to support the previous scheme. It trivialises the highways pressures Whalley faces. Currently, without the new access via the L&Q site being open most traffic is forced to utilise Wiswell Lane, a narrow virtually single-track potholed route with major traffic congestion where it connects to the A671. There is no longer adequate capacity in the local network despite what the now historic traffic surveys say. It would seem sensible to place a moratorium on all new house building in Whalley until the new route through the L&Q site is open and its efficacy can be established. The report goes on to resubmit the previous LCC 'agreed' highway solution for the creation of a new junction. The baseline is that there are two existing field accesses into the site, but the proposed access does not align with either. Instead, the applicant is seeking to create a new junction with ghost island in the centre of the carriageway. There are no footpaths on the eastern side of Clitheroe Road so all pedestrians will be forced to cross the road on the blind side of the bridge when vehicles are traveling from Clitheroe or Barrow. The junction will not be signal controlled, and it strikes me it will be particularly dangerous for the young or elderly to cross at this point. The proposed junction still fails to address the conflict with the existing residential access to Rookwood, 41 Clitheroe Road. The proposal places the ghost islands and the turning lanes directly opposite this existing home. If a vehicle is turning into the proposed scheme there is nowhere for vehicles accessing Rookwood to go. Swept paths are shown for all movements except this one which would clearly conflict, presumably this is a deliberate omission. It will be interesting to see how that is intended to work. It strikes me the Highway authority needs to think again about the safety of what they have apparently approved. I would also urge a reconsideration of the traffic data submitted previously to support the previous application, more housing approvals forced on the Authority on appeal elsewhere in the locality presumably now need to be factored into the figures. It also seems incredible that 39 homes generate only 23 two-way car movements in the peak hour. Most houses will have parking for three cars; these are mostly large family homes with multi-generational families in occupation. By the same token the recently approved hotel at The Eagle in Barrow (3/2025/0100) also needs to be factored into the highway numbers. None of this additional consented development appears to have been taken into account and I would reiterate the transport statement is a rehash of previous information so does not adequately reflect the current and planned traffic on the network. I would add that the accident records dating back to 2024 are also out of date, two significant accidents to my knowledge have occurred in the location within the last 12-months.

Noise

The overview summary seems to be that everything is fine according to the Planning Statement, yet the Noise Report flags the site as Medium Risk and that assumes mechanical ventilation is required to mitigate traffic noise from the A59 as opening windows for ventilation will not be acceptable. We live significantly further away from the A59 yet can be often woken by traffic noise. Living in such close proximity to this noise source would be intolerable to my mind.

The largely held view amongst residential and at the Parish Council is that the new application should be refused. Whalley and Barrow have already taken the brunt of new Housing development over recent years, to the extent that this is now eroding the very character of the village. It is virtually impossible to park in the village centre as there is no parking provisions other than that provided for customers of certain businesses and reduced on street availability following the recent village centre reconfiguration which has significantly limited the number of available spaces whilst at the same time more and more houses have been consented.

I do not feel that the community is any more welcoming of this proposal as it was last time, however I think it unlikely 175 objections will be made this time as very few people seem to know anything about the new application. The applicant says it has complied with its obligations to undertake Community Engagement and has included the brochure it produced for the previous application it was not sent out this time. As far as I can see they have made no attempt whatsoever to engage as they know how the community will react to this proposal, it is not wanted because of the harms it will bring will outweigh the benefits. Perhaps if people could see new health care services or better transport solutions for the village they might feel less inclined to object to new house building.

If there is any aspect you wish to discuss relating to this objection please do contact.

Kind regards



X 2 same
address

28 SEP 2026

22 September 2026

Kathryn Hughes
Planning Department
Ribble Valley Borough Council
Council Offices, Church Walk
Clitheroe, Lancashire BB7 2RA

By email: planning@ribblevalley.gov.uk

Re: Planning Application No: 3/2026/0635

Grid Ref: 373616 437093

Proposal: Proposed erection of 39 no. dwellings with associated access, gardens, parking and landscaping areas

Location: Land East of Clitheroe Road, Whalley

Dear Ms Hughes,

I write to formally object to the above planning application. I am the [REDACTED] House, which directly adjoins the application site, and I have a close and continuing interest in its outcome.

I also objected to the previous application on this site for 77 no. dwellings (ref: 3/2025/0588), which the Council refused on 5 February 2026 for six reasons including design, housing mix, surface water/drainage, road traffic noise and biodiversity net gain (BNG). I have reviewed the current application, the applicant's Planning Statement and the supporting technical reports, together with the consultation responses published to date. For the reasons set out below, the fundamental objections to development of this site have not been overcome, and in several respects the applicant's own submitted evidence confirms that the previous reasons for refusal remain live.

1. Note on the consultation period

The Council's neighbour notification letter is dated 4 September 2026, but I did not receive it until 17 September 2026, leaving a significantly reduced period in which to review a very substantial application (in excess of 30 separate technical documents) and prepare comments within the notified 21-day window. I would ask that the Council take this into account and ensure my comments are accepted and placed before the decision-maker regardless of the nominal deadline, consistent with the approach taken to the Planning Statement's late upload on the previous application.

2. The site remains open countryside outside the settlement boundary

Notwithstanding the reduction in scale from 77 to 39 dwellings, the fundamental planning objection is unchanged: the site lies wholly outside the defined settlement boundary of Whalley and is designated open countryside under the adopted Core Strategy Proposals Map. The applicant's own Planning Statement accepts this (paragraph 2.29 equivalent) and instead seeks to justify the development solely on the basis that housing supply policies are 'out of date' and that the 'tilted balance' under NPPF paragraph 11(d) should apply.

Even if the tilted balance is engaged, this does not equate to a presumption that permission must be granted. Paragraph 11(d) still requires refusal where the adverse impacts of the development would significantly and demonstrably outweigh the benefits. As set out below, this application carries a materially greater number of unresolved adverse impacts than the applicant acknowledges, including impacts confirmed by the applicant's own reports and by statutory consultees.

I would also note that the Council's most recently published 5-year housing land supply position (May 2025) claimed a 6.2 year supply. While recent appeal decisions elsewhere in the Borough have found lower figures, I understand RVBC's own updated 5YHLS statement was due for publication in August 2026. I would ask the Council to confirm the up-to-date, adopted supply figure it is relying on in determining this application, rather than accepting the applicant's own preferred figure of 3.45 years at face value.

3. Biodiversity Net Gain: the applicant's own metric shows a net loss, not a gain

This is the most significant new evidence arising from this application. The applicant's own Biodiversity Net Gain Assessment (ERAP, August 2026) reports a baseline on-site habitat score of 20.02 units and a post-intervention score of only 18.00 units — an on-site net change of minus 2.02 units, a fall of 10.07%. The report itself states in terms: 'Trading Rules Satisfied? No' and 'A net gain for area-based habitats is not demonstrated by the BNG Metric.'

This is not a technical shortfall to be resolved by planning condition. It is a fundamental non-compliance with the mandatory 10% biodiversity net gain requirement under the Environment Act 2021 and NPPF paragraph 192, and it is the same category of deficiency (delivery of BNG via unsecured off-site credits) that formed one of the six reasons for refusal of the previous 77-unit scheme. The applicant's own report proposes to resolve the shortfall by purchasing 'a biodiversity payment... with a habitat bank or other similar provider,' but confirms this arrangement is not yet in place and 'will be secured prior to completion of the Biodiversity Gain Plan' — i.e., after any grant of permission, with no quotation, contract or statutory credit secured at the point of determination. The Council should not grant permission on the strength of a promise to secure compliance with a statutory requirement at some later date; the deficit should be resolved, evidenced and secured before determination, not left to a post-permission condition.

4. Statutory objection from Lancashire County Council (Education) — unresolved

LCC's Schools Planning Team has formally objected to this application (response dated 15 September 2026). Their assessment shows that, taking into account other approved development in the catchment, local primary schools (Whalley CE Primary, Barrow United Reformed Church Primary and Langho & Billington St Leonard's CE Primary) already face a shortfall of 11 places before this development is even considered, and this application's yield of 12 further places would take the shortfall in the local primary school network to -23 places by 2031. LCC state plainly that this is 'an objection to your planning application' which 'will be withdrawn' only if a financial contribution (calculated at £252,168–£301,068) is secured.

The applicant's own S106 Draft Heads of Terms do not commit to this contribution. They state only that the applicant is 'willing to work positively with the LPA and relevant consultees to agree any

further obligations that may be required following consultation, including... education.' This is not a secured commitment and this outstanding statutory objection should not be treated as capable of resolution by a vague aspiration in the Heads of Terms.

5. Statutory objection from the NHS Integrated Care Board — unresolved

The Lancashire and South Cumbria ICB has also formally objected (response dated 8 September 2026), assessing that the development's approximately 120 additional patients would require a £38,880 contribution towards the expansion of Whalley Medical Centre, and stating explicitly: 'failure to secure the contribution we have requested effectively means that we are objecting to the application.' As with education, the S106 Heads of Terms contain no committed healthcare contribution — only a generic willingness to discuss 'health' obligations. Two statutory consultees therefore currently object to this application, and neither objection is resolved by anything in the application as submitted.

6. Ecological concerns not adequately addressed — badgers

A third-party response from what appears to be a wildlife/badger protection body (submitted 11 September 2026) records eight known badger setts within 1.7km of the site, including two setts approximately 0.7km away on different sides of the site, and a recorded badger fatality immediately at the site's field gate access point in April 2026 — i.e., after the applicant's ecology surveys. This directly undermines the Preliminary Ecological Appraisal's conclusion that badger presence can be 'reasonably discounted.' Given the direct evidence of an active badger population using or crossing the site, I would ask that the Council require an updated badger survey to be submitted and assessed prior to determination, not secured retrospectively by condition.

7. Road traffic noise remains at 'Medium Risk' — mitigation does not remove the harm

The applicant's own Road Traffic Noise Assessment continues to place the site in the 'Medium Risk' category for both daytime and night-time noise, notwithstanding the addition of acoustic boundary treatments and mechanical ventilation to habitable rooms. Future occupiers of a new residential scheme would therefore be reliant on closed windows and mechanical ventilation systems to achieve acceptable internal noise levels, which is a materially compromised standard of residential amenity for a new-build family housing scheme, and was itself a reason for refusal of the previous application. The Planning Statement records that the Council's Environmental Health Officer's objection on this point at the previous application remains outstanding, with only a request for a further site meeting to 'seek to fully address' it — meaning this objection has not, in fact, been resolved.

8. Flood risk and drainage — reliant on an unsecured third-party agreement

The proposed drainage strategy depends on a new connection into a culverted watercourse beneath Clitheroe Road, in the ownership of Lancashire County Council. The Flood Risk Assessment records only that the County Council has indicated there is 'no in-principle objection... subject to the appropriate permission(s)' — this permission has not yet been granted. Given that an outstanding Lead Local Flood Authority objection was itself a reason for refusal of the previous scheme, the Council should require confirmation that the necessary consents for this connection are formally in place before it can be satisfied that the surface water strategy is deliverable, rather than proceeding on the basis of an unsecured 'in principle' indication.

9. Housing mix does not reflect identified local need

While the affordable element (12 units, 30%) is policy compliant in percentage terms, the market housing element is overwhelmingly weighted towards large executive homes: 25 of the 27 market units (91%) are four-bedroomed, with the remainder five-bedroomed. No smaller or medium market units are proposed at all. This does not reflect a balanced housing offer for the settlement and is

inconsistent with the Council's own evidence of housing need across all tenures. The scheme should not be treated as delivering a comprehensive local housing solution simply because the affordable quantum is compliant.

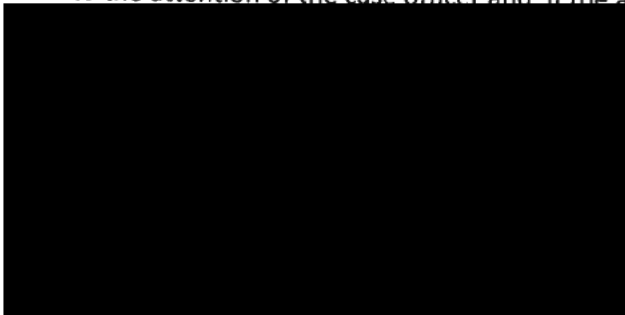
10. Cumulative effect

Taken individually, several of the matters above might be considered capable of resolution by condition or subsequent agreement. Taken together, however, this application currently carries: two outstanding statutory objections (education and health) with no secured financial contribution; a confirmed net loss of biodiversity contrary to statutory requirements; an unresolved noise objection carried over from the previous refusal; a drainage strategy reliant on a third party's unsecured permission; and new ecological evidence of badger activity not accounted for in the applicant's survey. This is a materially different and no less serious set of unresolved harms than those which led to refusal of the 77-unit scheme, and in my view they are capable of, and should, significantly and demonstrably outweigh the benefits claimed for the development, even if the tilted balance is found to apply.

Conclusion

"Has the applicant demonstrably overcome the Council's previous reasons for refusal?"

For the reasons set out above, I respectfully ask the Council to refuse this application. I would be grateful if these comments could be recorded against application reference 3/2026/0635 and drawn to the attention of the case officer and, if the application proceeds to Committee, to Members.



same address
as previous.



Planning Application No. 3/2026/0635

Land East of Clitheroe Road, Whalley

Proposed erection of 39 dwellings with associated access, gardens, parking and landscaping

Dear Sir/Madam,

Formal Objection to Planning Application 3/2026/0635

I wish to object to the above application.

Before addressing the planning merits of the proposal, I note that the consultation letter was dated 4 September 2026 but was not received at my property until 17 September 2026, leaving significantly less than the advertised consultation period in which to review and comment on a substantial planning application. I respectfully request that this representation be accepted in full and given appropriate weight.

Whilst I acknowledge that the current proposal has been reduced from the previously refused scheme for 77 dwellings under application 3/2025/0588, I remain concerned that many of the fundamental planning objections identified by Ribbles Valley Borough Council in refusing that application have not been satisfactorily addressed. The reduction in numbers alone does not remove the underlying policy conflicts associated with the development of this site.

1. Development in Open Countryside

The application site remains outside the defined settlement boundary and is designated as open countryside. The applicant acknowledges this within the Planning Statement.

Although the applicant relies heavily upon arguments relating to housing land supply, the location of the site has not changed. The proposal would result in the urbanisation of a prominent greenfield field at the northern approach to Whalley and would permanently erode the distinction between the existing settlement and the surrounding countryside.

The Council previously concluded that development on the site would introduce an "incongruous and discordant form of development within the Open Countryside that fails to respond positively to the inherent character of the area".

In my view, that conclusion remains valid. Whilst the scheme has been reduced from 77 to 39 dwellings, it still represents a substantial housing estate extending into open countryside and remains contrary to the landscape-led objectives of Core Strategy policies DMG1 and DMG2.

2. Previous Landscape and Design Concerns Have Not Been Fully Resolved

A key reason for refusal of the previous application was poor design, inappropriate layout, excessive hardstanding and insufficient regard for protected trees.

Although the revised scheme contains fewer dwellings, the development still introduces:

- Significant engineered roads and infrastructure.

- Extensive built form across a currently undeveloped field.
- Frontage parking and estate-road character.
- Development extending towards existing mature trees and landscape features.
- A suburban housing layout that bears limited relationship to the existing character of this part of Whalley.

The proposed housing estate would fundamentally alter the character of the site and its contribution to the rural approach into the village.

3. Harm to Existing Residential Amenity

As an [REDACTED] I am concerned about the effect of the proposal upon the enjoyment of neighbouring properties.

The development would introduce:

- Increased activity and vehicle movements immediately adjacent to established dwellings.
- Loss of openness currently enjoyed by neighbouring properties.
- Additional lighting, noise and disturbance.
- Greater overlooking and perception of overlooking from new housing, roads and pedestrian movement.
- A substantial urbanising effect on what is currently an undeveloped field.

Whilst the applicant refers to separation distances, residential amenity is not simply a matter of measuring distances between windows. The loss of outlook, tranquillity and open character experienced by existing residents should also be afforded weight.

4. Drainage and Surface Water Concerns Remain

The previous application was refused because the Council concluded that the site was at risk from surface water flooding and the applicant failed to demonstrate that an appropriate sustainable drainage strategy could be achieved.

The current Planning Statement confirms that parts of the site remain affected by surface water flooding risk and that discharge arrangements rely upon future connections and approvals relating to off-site drainage infrastructure.

Whilst additional drainage information has been provided, significant reliance continues to be placed upon future agreements and technical approvals. I am not persuaded that the application has fully demonstrated a practical and deliverable drainage solution that removes all concern regarding flood risk both on-site and elsewhere.

Given the site's topography and the acknowledged flood-risk areas within the northern section of the site, this remains a matter requiring careful scrutiny.

5. Noise Concerns Have Not Been Fully Addressed

The Council previously refused the development because it had not been demonstrated that future residents would not be exposed to unacceptable road traffic noise from the A59 and Clitheroe Road.

The applicant's own documents continue to categorise the site as experiencing "medium risk" noise conditions and acknowledge the need for mitigation measures including acoustic barriers and mechanical ventilation systems.

The need to rely on acoustic fencing, closed glazing and mechanical ventilation suggests that the site is not naturally suited for residential development. Furthermore, the Planning Statement acknowledges that concerns remained from Environmental Health regarding the previous application and that further discussions are still anticipated.

This does not provide confidence that the issue has been fully resolved.

6. Biodiversity and Tree Impacts

The previous scheme was refused because insufficient evidence had been provided regarding Biodiversity Net Gain and habitat loss.

The current proposal still requires removal of existing trees and relies upon future biodiversity compensation measures, including off-site solutions that have not yet been fully secured.

The site currently performs an important role as open green infrastructure containing mature trees, woodland edges and habitat connectivity. While replacement planting is proposed, mature landscape features cannot be replaced immediately, and the ecological value of the existing site should not be underestimated.

7. Reliance on Housing Land Supply Should Not Override Site-Specific Harm

The applicant's principal argument is that the Council cannot demonstrate a five-year housing land supply.

However, a housing land supply shortfall does not automatically justify development on every greenfield site. The planning balance must still consider:

- Landscape harm.
- Character and appearance.
- Residential amenity.
- Ecology.
- Flood risk.
- Design quality.
- The cumulative impact of further expansion into open countryside.

The existence of a housing need should not outweigh all other planning considerations where significant local harm would result.

Conclusion

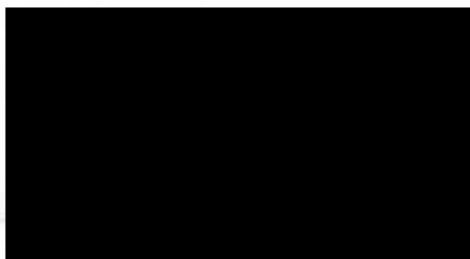
For the reasons outlined above, I respectfully request that Ribble Valley Borough Council refuse application 3/2026/0635.

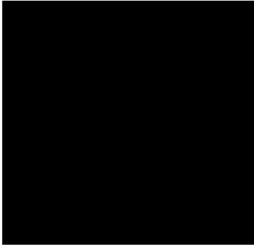
The proposal remains a significant and inappropriate incursion into the open countryside on the edge of Whalley. In my opinion, the scheme fails to adequately overcome several of the principal

concerns that led the Council to refuse application 3/2025/0588, particularly those relating to landscape character, design quality, residential amenity, drainage, noise and environmental impact.

I trust that the Council will give full consideration to these concerns when determining the application.

Yours faithfully,





28 SEP 2026

22 September 2026

Kathryn Hughes
Planning Department
Ribble Valley Borough Council
Council Offices, Church Walk
Clitheroe, Lancashire BB7 2RA

Re: Planning Application No: 3/2026/0635

Grid Ref: 373616 437093

Proposal: Proposed erection of 39 no. dwellings with associated access, gardens, parking and landscaping areas

Location: Land East of Clitheroe Road, Whalley

Dear Ms Hughes,

 are writing to object to the above planning application. We have reviewed the application documents published on the Council's planning portal, including the applicant's own technical reports and the responses received from statutory consultees, and we set out below the grounds on which we both consider the application should be refused.

1. The applicant's own evidence shows a net loss of biodiversity

The application is required to deliver a minimum 10% biodiversity net gain (BNG) under the Environment Act 2021 and NPPF paragraph 192. However, the applicant's own Biodiversity Net Gain Assessment (ERAP, August 2026) reports a baseline on-site score of 20.02 habitat units falling to only 18.00 units after development — a net loss of 10.07%. The report states in terms: 'Trading Rules Satisfied? No' and 'a net gain for area-based habitats is not demonstrated by the BNG Metric.'

Rather than resolving this before submission, the applicant proposes to buy in a biodiversity credit from an unnamed 'habitat bank or other similar provider' at some point after permission is granted. No such credit has been purchased, quoted or secured. The Council should not accept a statutory environmental requirement being deferred to a promise made after the decision is taken — the shortfall should be evidenced and secured before determination, not afterwards. The purchase of credits, from experience as a rural surveyor are a coward's way out of facing important issues. If we are to offset the net loss of biodiversity this should be done so locally, not through credits and such other scheme which do not repair what is lost in the local environment. This puts money into other schemes in the country rather than seeing any local benefit. The field in question is land of significant local history, an original part of Bramley Mead. It is land we see still being farmed, where deer, foxes, badgers and buzzards all seek refuge and habitat due to them being pushed from their homes.

2. Noise: the site remains at 'Medium Risk', not an acceptable standard for new housing

The applicant's own Road Traffic Noise Assessment continues to categorise the site as 'Medium Risk' for both daytime and night-time noise from the adjacent A59, notwithstanding the proposed mitigation. Future residents would need closed windows and mechanical ventilation to achieve acceptable internal noise levels in their own homes — a poor standard of amenity to be building into new family housing from the outset. This was one of the reasons the Council refused the previous 77-home scheme on this site, and the Planning Statement itself confirms that the Council's Environmental Health Officer's objection on this point has still not actually been resolved, only that a further meeting has been requested to try to address it.

3. Outstanding objections from the NHS and Lancashire County Council (Education) — easily fixed, but not yet fixed

Two statutory bodies currently object to this application in writing:

Lancashire County Council's Education team objects because local primary schools (Whalley CE, Barrow United Reformed Church, and Langho & Billington St Leonard's) are already forecast to be short of places, and this development would push that shortfall to -23 places by 2031. LCC state plainly that a payment of £252,168–£301,068 towards school places would resolve their objection.

The NHS Lancashire and South Cumbria Integrated Care Board objects because the development's estimated 120 new residents would require £38,880 towards expanding Whalley Medical Centre, and states in terms that 'failure to secure the contribution we have requested effectively means that we are objecting to the application.'

Both of these objections could be removed at a stroke if the developer simply agreed to pay what is being asked. Yet the applicant's own draft S106 Heads of Terms make no firm commitment to either sum — they offer only a vague willingness to 'work positively' on 'education' and 'health' contributions, with nothing pinned down. I would ask the Council not to treat these as resolved, or capable of being resolved by condition, unless and until the developer actually commits, in the S106 agreement, to pay the contributions both bodies have asked for in full.

4. Traffic and additional vehicle movements

The application would add 39 households — and, on the applicant's own parking standards, well over 90 additional parking spaces — onto Clitheroe Road, at a point where the speed limit changes and close to the site's access. The applicant's Transport Statement predicts 23 two-way vehicle movements in the morning peak and 21 in the evening peak generated by this scheme alone, but this does not exist in isolation: it comes on top of other recent and pending approvals in the immediate area (including the 300-home scheme off Longsight Road, Langho, allowed on appeal in June 2026, and other sites referenced in the applicant's own Planning Statement). I would ask the Council to require a proper assessment of the cumulative traffic impact of this and other approved/pending development on Clitheroe Road and the surrounding network, rather than assessing this application's traffic impact in isolation.

5. Wider environmental impact and proximity to Light Clough SSSI

The applicant's own Ecological Survey confirms that the site lies within a Site of Special Scientific Interest (SSSI) Impact Risk Zone for Light Clough SSSI, located approximately 1.45km to the north-east. While Natural England's standard screening tool indicates that this particular category of development does not automatically trigger formal consultation with Natural England, the site's location within this zone is still a material indicator of the sensitivity and connectivity of the surrounding landscape.

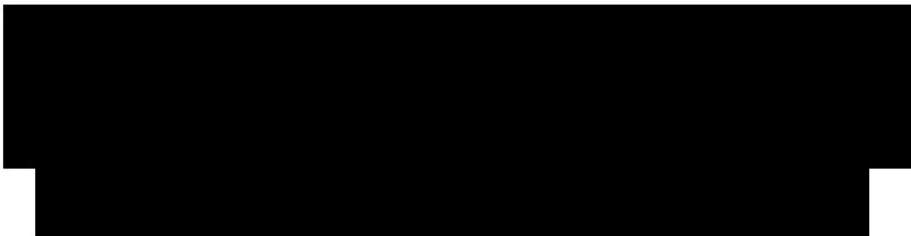
This matters because the development also requires the removal of a number of established trees and areas of woodland, scrub and hedgerow that currently provide habitat connectivity across the wider countryside — habitat which the applicant's own BNG assessment confirms will not be replaced like-for-like, resulting in the net loss set out at point 1 above. Loss of this connective habitat, combined with the confirmed net biodiversity loss, is a genuine and evidenced environmental harm to the wider area, not merely a loss confined to the site boundary, and is directly contrary to the NPPF's aims (paragraphs 187 and 192) to protect and enhance the natural environment and biodiversity.

Conclusion

For the reasons set out above — a demonstrated net loss of biodiversity, an unresolved noise objection, two live statutory objections from the NHS and LCC Education that the developer has not committed to resolve, unassessed cumulative traffic impact, and a genuine environmental impact on habitat connectivity in an area recognised as sensitive by its proximity to Light Clough SSSI — we ask the Council to refuse this application.

We would be grateful if these comments could be recorded against application reference 3/2026/0635 and drawn to the attention of the case officer and, if the application proceeds to Committee, to Members.

Yours sincerely,

A large black rectangular redaction box covering the signature and name of the sender.