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| **Report to be read in conjunction with the Consultation Decision Letter .** |
| **Signed:** | **Officer:** | **KH** | **Date:** | **11/4/23** | **Manager:** | **LH** | **Date:** | **17/4/23** |
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| **Application Ref:** | 2023/0169 |  |
| **Date Inspected:** | N/A | **Site Notice:** | N/A |
| **Officer:** | KH |
| **DELEGATED ITEM FILE REPORT:**  | **OBJECTION** |
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| **Development Description:** | Consultation on South Ribble application 07/2023/00035/OUT. Outline planning application (With all matters reserved) for an employment-led mixed use development comprising up to 170,000sqm of employment floorspace (Use Class B2/B8) up to 10,000sqm of C1 Hotels, 5,000sqm of class E(b) retail use, and up to 7500sqm of Class E(g) office use, with associated car parking, service yards and loading bays, landscaping and associated access across 3 plots of land at Cuerdale, land to the West of Salmesbury, South Ribble together with the demolition of a dwelling |
| **Site Address/Location:** | **Cowells Farm Cuerdale Lane Samlesbury PR5 0UX** |
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| **RELEVANT POLICIES AND SITE PLANNING HISTORY:** |
| **Ribble Valley Core Strategy:**Key Statement DS1 – Development StrategyKey Statement DS2 – Sustainable DevelopmentKey Statement EN1 – Green BeltKey Statement EC1 – Business and Employment DevelopmentKey Statement DMI2 – Transport ConsiderationsPolicy DMG1 – General ConsiderationsPolicy DMG2 – Strategic ConsiderationsPolicy DMG3 – Transport & MobilityPolicy DMB1 – Supporting Business Growth and the Local EconomyNational Planning Policy Framework (NPPF) |
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| **OBSERVATIONS:** |
| **Background:**This consultation has been received amidst a live application for ‘Cuerdale Garden Village’ within South Ribble to which Ribble Valley has previously responded to, citing concern regarding a number of elements of the scheme. That application remains undetermined. |
| **Proposed Development for which comments are sought:**Relative to this, the consultation now seeks views on the outline application for the development of an employment-led mixed use development comprising up to 170,000sqm of employment floorspace (Use Class B2/B8), up to 10,000sqm of C1 Hotels, 5,000sqm of class E(b) retail use, and up to 7500sqm of Class E(g) office use with associated car parking, landscaping and access to be delivered across three plots within the vicinity of the proposed Garden Village at Cuerdale, Salmesbury. The current proposal raises several important planning considerations that are set out below, many of which also re-iterate very similar issues already raised regarding the Cuerdale Garden Village. |
| **Assessment of Proposed Development:****Green Belt**The site location lies wholly within designated Green Belt which benefits from significant and long-term protection within both local and national planning policy, with development only justified where there are overriding, justified and very special circumstances which clearly outweigh the harm inflicted through inappropriate development. The proposed development is inappropriate development in the Green Belt as it does not fall within any of the exceptions in NPPF paras 149 & 150. Inappropriate development is *‘by definition harmful to the Green Belt and should not be approved except in very special circumstances’* (NPPF Para 147). The NPPF continues in Para 148, *‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.’*The planning statement accompanying the application suggests that those ‘very special circumstances’ as required by paragraphs 147 and 148 of the NPPF are present by virtue of the development’s relationship to the ‘emerging’ Garden Village, the evidenced Employment Land Need within the area, the ‘transformational potential’ of the National Cyber Force Campus as well as wider contributions to sub-regional and national strategic ambitions. Firstly, the relationship of the site to Cuerdale Garden Village is considered largely immaterial to the application given the village itself is not consented or supported by any adopted development plan. Therefore, the proximity or any functional relationship to the proposed garden village cannot demonstrate ‘special circumstances’.In relation to employment needs, the evidence does also not demonstrate ‘very special circumstances’.  The need for employment land as evidenced relates to sub-regional and regional need. Whilst demand and need may be present at the level of delivery proposed at this scale, there is no adequate justification of why this need is best accommodated within a site of this size or in this specific location. The application displays no sign of assessing any other alternative locations within South Ribble or Lancashire to locate such development to serve the sub-region, and consequently the arguments which cite special circumstances are considered inadequate. The planning statement justifying the scheme also references the ‘transformational potential’ of the National Cyber Force Campus as part of the special circumstances in favour of Green Belt release. Similarly to the Garden Village, this campus does not benefit from planning permission and therefore is speculative in part, assuming the permission and delivery of the campus. Whilst the presence of a National Cyber Force Campus may present opportunities for attracting further investment and has received high level support from the Government, the project is in its very early stages, does not have any planning consent and as such this development appears overly opportunistic in assuming its delivery. If special circumstances were to ever exist by virtue of the Cyber Campus, they certainly do not exist at this stage. In any event, true evidence of the campus’s potential is questioned in the absence of quantified economic value within the application and therefore the requisite detail and evidence of the special circumstances for development required within the Green Belt has not been fully provided. Also not adequately evidenced is the contribution of the scheme to wider strategic objectives at a range of levels as part of the argument for special circumstances. The planning statement firstly references the strategic aims of development within this area as part of the Central Lancashire Local Plan, though this is considered to hold no planning weight on the basis that the plan is unadopted and in its early stages (preferred options, Regulation 18). The planning statement goes on to reference the sub-regional strategic ambitions of the ‘New Deal for Greater Lancashire’ and ‘Lancashire Strategic Economic Plan’ which identify the need for additional strategic sites to further stimulate the region’s economy. Whilst this may be true, such arguments hold little planning weight and are significantly outweighed by the harm to the Green Belt by reason of inappropriateness which would arise as a result of this development. It may be possible to deliver these strategic ambitions and objectives more sensitively, and there is no evidence to prove that the location of a site of this size within designated Green Belt is absolutely necessary and would endanger sub-regional economic prosperity if not delivered.Instead, the proposed development in summary represents an unsustainable and inappropriate form of development which is unsuitably located within designated Green Belt without the credible benefit of exceptional or special circumstances in favour. Consequently, this is a point of objection to the development, with a further matter for consideration being the consequent harm which such development, if approved, would inflict upon the integrity and long-term stability of the Lancashire Green Belt at a strategic level. **Employment Land + Economy**It is acknowledged that the scheme proposes to deliver 170,000 sq. metres of employment floorspace as well as a hotel, retail and office uses. In the interests of comparison and context, the employment element of the Standen strategic housing site within the Ribble Valley includes 2 hectares of employment land which may typically generate ~80,000 sq. metres of floorspace. The borough also has a strategic site at Barrow, representing approximately 70% of all allocated employment land in the borough. This site has continued to be challenging in securing its development, and there is concern that additional employment land release at this scale could potentially impact on the delivery of the strategic site at Barrow depending on the time frames of delivery at the site sought for this permission. In this respect a substantial error in the submitted ‘Employment Land Demand Report’ undertaken by Aherne Property Consultants is highlighted:“The report recognises that outside of the Samlesbury Enterprise Zone (EZ), the Ribble Valley has no strategic scale sites proposed therefore leaving a gap in the market which is all the more acute when the NCF is likely to take a significant land take out of the EZ therefore reducing land availability there.”Whilst competition in itself is positive, it remains a consideration that this site, in combination with Salmesbury Enterprise Zone, the Barrow and Standen strategic sites as well as the potential growth strategy of Blackburn with Darwen, risks oversupply and market saturation at the sub-regional scale. It is noted that, there is further employment land in the proposed garden village and at a proposed site at Causeway Farm, albeit there is uncertainty over these proposal gaining consent.  The cumulative impacts from a potential significant influx of employment land in a relatively confined area surrounding Mellor requires careful consideration. These observations are drawn to South Ribble’s attention especially given the oversights within the ‘Employment Land Demand Report’, and ultimately point towards issues which are best placed for consideration as part of the plan-making system and the Duty to Co-Operate.**Highways**Junction 31 of the M6 and the A59 form a key part of the strategic highway network connecting the Ribble Valley with Preston and the wider North-West. Such is the importance of this part of the strategic road network, the Council must be satisfied that there will be no adverse or undue impact upon the network arising from the scheme. Whilst this is largely within the remit of National Highways and Lancashire County Council, Ribble Valley Borough Council maintains an interest relating to the consequences of unmitigated congestion within this area of the network and the impact of this on future growth and investment decisions within our borough.It is noted that National Highways have identified a number of significant deficiencies within the submitted transport assessment as well as non-compliance with the latest DfT guidance, and as such request that the application is not determined until at least 16 June 2023 as there is insufficient information to form a view. The Council would also welcome this approach in order to enable a holistic assessment of transport implications which is critical to outlining adequate mitigation.Separately, LCC Highways also raise numerous concerns, specifically questioning how impacts on the A59 are being considered. We would also welcome additional information on this in order to ensure that all potential transport implications, both within the South Ribble and beyond, are duly considered.Consequently, we would request that the application is not determined until adequate transport assessments are submitted which demonstrate no justifiable adverse impacts on the operation of Junction 31 and the A59.**A Plan-Led System**A principle at the heart of planning legislation and the National Planning Policy Framework is that the system should ultimately be plan-led. Given the numerous and significant issues raised above and the magnitude of the development proposed, it is considered that this scheme should ultimately be considered through the plan-making system. Prior to an application for planning permission, development of this scale should be fully justified, tested and considered against the overriding planning objective of securing a sustainable pattern of development relative to the needs and constraints of the area. Whilst the land within this planning application does appear in the most recent consultation (Regulation 18) as part of a larger ‘Cuerdale Growth Option’, the Central Lancashire Local Plan is at an early stage of the process of being adopted and therefore very little weight should be given to the emerging plan in support if the proposal.  |
| **Conclusion:**In summary, the Council objects to the scheme based on the inadequate justification and presentation of the ‘very special circumstances’ which are required for development within designated Green Belt, in addition to the perceived failure of the application to fully address or consider matters relating to highways impacts and the potential for employment land oversupply within South Ribble, Blackburn and Ribble Valley areas. A proposal of this scale in the green belt should best come through the local planning process to consider the need for the development in that particular location requiring the release of green belt land.  |
| **RECOMMENDATION**: |  |
| **Objection raised** |