



Ribble Valley Borough Council  
Council Offices  
Church Walk  
Clitheroe  
BB7 2RA

9 February 2021

For the attention of Adam Birkett

Dear Sir

Reference 3/2020/0667

Conversion and change of use of former fish hatchery building to 3 holiday let units, and creation of associated car park for 6 vehicles at the Witcher Well Fish Hatchery, Whitendale Road, Dunsop Bridge, BB7 3BL.

I write further to my letter of 27 November 2020, objecting to the above planning Application and in response to the letter of clarification and amended documents submitted by the Applicant, 28 January 2021.

### **Holiday Units**

Whilst an Application has not been made for permanent residential units, that is not to say that there will not be a permanent human presence at the site, as assuming the proposed business is successful the units will be capable of being let year round. The site is currently devoid of such a human presence and this has not been addressed within the ecology report. Whilst Whitendale Road does attract many visitors in day light hours, the evenings are exceptionally quiet and provide a sanctuary for wildlife.

It is remiss for the Applicant to expect that guests staying in the units will want to enjoy the area within the confines of the units and not venture outside. In the absence of providing outdoor furniture, it is likely furniture will be moved from the units to the outdoors (with or without the proprietors permission). Similarly whilst BBQ's may not be provided by the proprietor there will be nothing to stop guests from bringing their own disposable BBQs etc. Such equipment will not only have a detrimental visual impact on the area, but pose a significant health and safety risk to the open moor land, which during recent spring/summer months has been tinder dry. Whilst the proprietor may discourage this, there will be no way to police this due to the remote location and lack on onsite presence. Visitors to the area are often ignorant to the fire risks as is evident by the number of moorland wildfires in recent years.

Whilst competition to other businesses is not a material planning objection, any presumption in favour of sustainable development should only be made if there is an objective need for housing or other uses which cannot be met within neighbouring areas. (NPPF). The number of alternative places to stay in the area is a relevant consideration. Furthermore, Para 172 of the NPPF states that the scale and development within AONB sites should be limited. Consideration of development in such areas should include need and whether such development would be in the public interests. Whilst the Applicant cites the current pandemic as a catalyst for need, it will no doubt have abated before the development can be completed. In any event there are other Applications for planning already with the council for additional holiday accommodation, which are located in Dunsop Bridge and would not result in the detrimental impact on the AONB. Furthermore, the council's Core strategy policy, para 3.17, states in order to achieve successful tourism, it is necessary to ensure that the reason people

visit the area is not destroyed. In this regard the continued safety of Whitendale Road is of paramount importance. The main draw to the area for the majority of the people who visit Whitendale road is the fact it has very limited traffic. If the safety of the road is compromised, this is likely to impact on the number of tourists visiting the area and using the amenities which already exist in the village.

## **Highways**

The NPPF paragraph 110 (c) states development should create places that are safe, secure and attractive which minimize the scope for conflict between pedestrians' cyclists and vehicles. The only access to the site is via a private road, Whitendale Road. Vehicle access to the public is restricted, although there is a public bridleway where the public can walk, cycle or ride. The road itself is a single track, no through road, with limited passing places. There are 5 houses located north of the proposed site which have vehicle access rights along the road. Whilst the creation of 3 properties will significantly increase traffic generation along the road, as in addition to guests the units will also need to be serviced (which the Applicant fails to reference), creating further traffic generation and pollution (noise etc). This is of particular concern as it is a bridleway, used predominately by families with small children, prams, disabled people, cyclist and horse riders. The attraction by users to the area is enhanced by the quality of the road surface and the restricted number of vehicles able to use the road.

The additional generation of traffic in such an area is not only likely to contribute to increased pollution, but also compromise highway safety as the visitors to the proposed site will not be familiar with the area, the road or the likely road users, which are often disabled, small children on foot or on bicycle or infants in prams. This is a scenario which would be unlikely if the site were returned to an agricultural purpose, as those using the unit would, more likely, be familiar with the road.

A further point to note is the fact Whitendale Road can be particularly treacherous to those who are not familiar with the area. The road is untreated and due to its location in a remote valley, it has a micro-climate where snow and ice is much more common place than in the surrounding areas. In addition the site is situated just after a sharp bend in the road, where there is no visibility to oncoming road users. Unfortunately due to the location of the road, the majority of visitors to the area (which are predominantly pedestrians) do not expect to encounter traffic and walk, (almost without exception) in the middle of the road. This is of particular concern given the vulnerability of the road users who are often either physically or mental unable to react quickly and move to allow traffic to pass. Furthermore, if an accident were to occur, the remote location is likely to result in the need for the air ambulance to be dispatched.

The accessibility for wheelchair users, in particular, should be protected. The council has already gone to great lengths to ensure the paths are wheelchair accessible, and have been repaired many times following flooding. This is no doubt as there are very few roads within the AONB which offer wheelchair users unimpeded access to such unspoilt and outstandingly beautiful countryside.

Whilst it is noted that the Applicant suggests they will carefully manage guests to ensure vehicle and parking number are not exceeded. It will be impossible to do this without onsite presence. If numbers are exceeded this is likely to result in cars being parked on Whitendale Road. This will either cause an obstruction on Whitendale Road (contrary to assurances given to the highway agency), impact on the safe use of the road and have a detrimental visual impact on the area. Even if it is possible for additional vehicles to be parked at the proposed site, this will have an unacceptable visual impact on the area, which would end up resembling a car park.

Furthermore, no account for parking of non-residents at the uni i.e. those who are required to either service/maintain the property, or assist in increasing the biodiversity of the surrounding land, has been taken into account.

## **Flood Risk**

Contrary to the suggestion in the proprietors response, 28 January 2021, work has been carried out at the site, such as the erection of the perimeter fence and the burying of telecommunication lines. This has been significant enough to alter the drainage of the land and lead to flooding on Whitendale Road, highlighting just how sensitive the land is to a change of use.

The proposal to install a package treatment plant and the need for such consent should be a relevant planning consideration, particularly given the absence of its consideration in the ecology report.

The Ecology Assessment report, states that the River Dunsop holds good spawning ground for salmon and sea trout. The flood risk assessment report, dated 2019 recommended the package treatment plant should be located under the proposed car parking area. Contrary to these recommendation, the current Application proposes the treatment plant be located at the site of the current water tank, which we assume is insufficient to deal with the anticipated volume of effluent which the proposed development will generate. The Package treatment plant requires consent to discharge effluent into the ordinary water course from the environment agency, presumably as it may impact on the quality of the water and therefore have a detrimental impact on the spawning ground for seatrout and salmon. It is therefore a serious oversight in failing to address this issue in the ecology report.

## **Ecology**

We note the plans for screening include planting oak, mountain ash and silver birch. This does not include the wide range of planting recommended in the ecology report. Representations as to the proprietors commitment to providing screening have already been highlighted, and it remains a concern that a monkey puzzle tree has already been planted, (despite the suggesting that the site is being used for storage only of the monkey puzzle trees). Furthermore, as stated previously, many of the trees already planted are dead or pot bound. In any event, the proposal to plant slow growing trees will mean screening of the development is likely to be visible for many generation to come. The planting is also only likely to provide screening during the summer months when there is foliage.

Whilst a number of sky lights have been removed from the original plans, a number remain. This cannot be said to be sensitive lighting and will create unacceptable overspill impacting on both the wildlife and the dark skies in the AONB. Whilst there is currently a flood light at the site, it has never been used [REDACTED] and would have been seldom used previously as the site was not used in the evenings.

It is assumed outdoor lighting will be in operation at the sight continually to ensure the safety of guests. The ecology report fails to address how the constant lighting will impact on the surrounding wildlife, or the constant human presence (and the associated noise, waste management etc.) should this business venture be successful if generating year round letting.

The letter of clarification suggests that it is the proprietors intention to find a new viable use of a building in order to deliver environmental and biodiversity enhancements and benefits. It is a concern that the proprietor has not made any suggestion as to what this may be. Given the length of time in which he has owned the property, it undermines his commitment to the AONB. A further concern is that if planning permission is granted there is no legal obligation upon the Applicant to honour this part of his proposal.

We therefore strongly object to the planning Application.

Yours faithfully

[REDACTED]