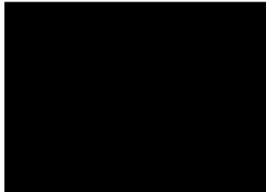
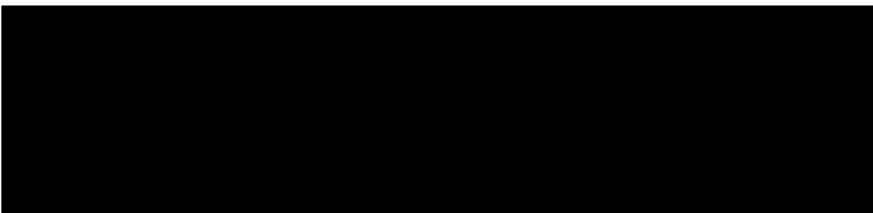


Nicola Gunn

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 30 November 2021 12:46
To: Web Development; Planning
Subject: Planning Application Comments - 3/2021/1008



Is your address in Ribble Valley?: Yes



Locality:

County: Lancashire

uprn: 10022973330

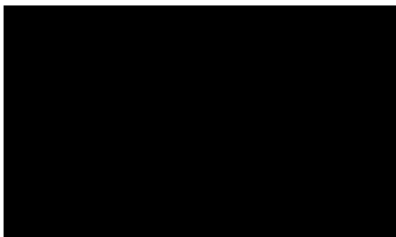
usrn: 31800017

ward: E05005292

Planning Application Reference Number: 3/2021/1008

Address of Development: Land at Higher Hodder Bridge (Field to South), Chipping Road, Chalgley, Clitheroe, BB7 3LP

Your Comments: 30 November 2021



To: The Planning & Development Committee
Ribble Valley Borough Council

Dear Members of the Committee

I wish to object to the following application:

Application Number: 3/2021/1008

Address: Land at Higher Hodder Bridge (Field to South), Chipping Road, Chalgley, Clitheroe, BB7 3LP

[REDACTED] I am very well aware of the remarkable nature of the Hodder Valley and in particular the area of the proposed development as it is somewhere I walk regularly.

We are privileged in Ribble Valley to have a remarkable Area of Outstanding Natural Beauty, one of the finest in all England, and the River Hodder is the very heart of this area.

I have always felt that the people of Ribble Valley, and in particular their elected representatives, would hold this entrustment safe for future generations to enjoy, and not allow it to be changed in ways that were not vital to human wellbeing. I believe this is a solemn duty for the members of the committee.

This proposed development is, surely, completely out of keeping with the preservation of this important part of the Area of Outstanding Natural Beauty. An unnecessary and environmentally damaging addition that will forever change this stretch of the river.

This is not vitally needed housing but a very large house for those who are in a position to live anywhere in this area, not housing for those who cannot afford to live in the area where they work.

I have read the Environmental Appraisal by Envirotech. This appraisal is based on a single site visit on 13th December 2019 and in winter. In my opinion, [REDACTED] this is totally inadequate.

I have been walking that section of the river for 33 years and I regularly see Kingfishers in that very stretch affected by the application. This Schedule 1 species under the Wildlife & Countryside Act tends not to be present in winter as the birds disperse towards the coast in the coldest months.

Indeed, the Kingfishers, the Dippers and the Goosanders are part of the delight of walking this beautiful stretch of the river. Never mind the rare Little Egrets that have now started to appear.

As regards Otters, I have seen their 'spraints' (droppings) regularly on the banks and rocks and I know a number of people who have seen them in the area. These are still mainly nocturnal creatures, owing to long persecution, unfortunately.

I was quite astonished to see the claim that there are no records of Badgers within 2 kilometres of the site. This is completely erroneous. I have personally seen Badgers on numerous occasions on that side of the Hodder, crossing the road beyond the Higher Hodder Bridge and they are also common on the other bank, [REDACTED]

These are just a few of my observations in connection with the Environmental Appraisal. I could add more but I feel the members of the committee have enough to go on. This is an important area for wildlife.

Should the committee doubt my abilities, I would like to explain that [REDACTED] who [REDACTED]

I hope the members of the committee will carefully take into account what I have said. You have a great duty to coming generations. Please protect the Hodder, the Area of Outstanding Natural Beauty as a whole and its precious and threatened wildlife and do not let the Hodder be altered forever by permitting large waterside houses. After all, once one such development is allowed there will be more...

Yours faithfully



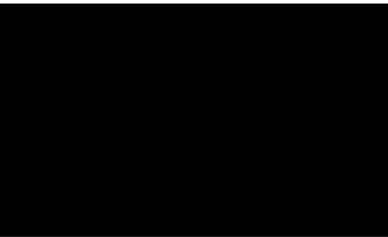
Nicola Gunn

From: [REDACTED]
Sent: 30 November 2021 12:41
To: Planning
Subject: Objection to planning application No 3/2021/1008

⚠ External Email

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30 November 2021



To: The Planning & Development Committee
Ribble Valley Borough Council

Dear Members of the Committee

I wish to object to the following application:
Application Number: 3/2021/1008
Address: Land at Higher Hodder Bridge (Field to South), Chipping Road, Chaigley, Clitheroe, BB7 3LP

[REDACTED] I am very well aware of the remarkable nature of the Hodder Valley and in particular the area of the proposed development as it is somewhere I walk regularly.

We are privileged in Ribble Valley to have a remarkable Area of Outstanding Natural Beauty, one of the finest in all England, and the River Hodder is the very heart of this area.

I have always felt that the people of Ribble Valley, and in particular their elected representatives, would hold this entrustment safe for future generations to enjoy, and not allow it to be changed in ways that were not vital to human wellbeing. I believe this is a solemn duty for the members of the committee.

This proposed development is, surely, completely out of keeping with the preservation of this important part of the Area of Outstanding Natural Beauty. An unnecessary and environmentally damaging addition that will forever change this stretch of the river.

This is not vitally needed housing but a very large house for those who are in a position to live anywhere in this area, not housing for those who cannot afford to live in the area where they work.

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Indeed, the Kingfishers, the Dippers and the Goosanders are part of the delight of walking this beautiful stretch of the river. Never mind the rare Little Egrets that have now started to appear.

As regards Otters, I have seen their 'spraints' (droppings) regularly on the banks and rocks and I know a number of people who have seen them in the area. These are still mainly nocturnal creatures, owing to long persecution, unfortunately.

I was quite astonished to see the claim that there are no records of Badgers within 2 kilometres of the site. This is completely erroneous. I have personally seen Badgers on numerous occasions on that side of the Hodder, crossing the road beyond the Higher Hodder Bridge and they are also common on the other bank, [REDACTED]

These are just a few of my observations in connection with the Environmental Appraisal. I could add more but I feel the members of the committee have enough to go on. This is an important area for wildlife.

Should the committee doubt my abilities, I would like to explain that [REDACTED] who [REDACTED]

I hope the members of the committee will carefully take into account what I have said. You have a great duty to coming generations. Please protect the Hodder, the Area of Outstanding Natural Beauty as a whole and its precious and threatened wildlife and do not let the Hodder be altered forever by permitting large waterside houses. After all, once one such development is allowed there will be more...

Yours faithfully

[REDACTED]

Nicola Gunn

From: [REDACTED]
Sent: 29 November 2021 19:30
To: Planning
Subject: Planning app no 3/2021/1008

⚠ 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.

Dear Laura.

We are writing to object to the planning application as above. at Higher Hodder Bridge, based on the following grounds and points of concern :-

1. Increased traffic and parking : I feel that during a prolonged building phase and construction of this magnitude, that it will have significant impact on our roads and parking.
The entrance proposed on the bridge is a popular parking place for walkers and fishermen alike already. Which will cause a negative impact particularly for [REDACTED]
On peak days parking is already an issue, if this goes ahead where will the cars then park ? [REDACTED]

In addition the lane is already dangerous with an unsightly brow, we are concerned for all local children who cross Chipping Road [REDACTED]
This will compound not only with the further lack of parking space caused, but heavy plant and construction traffic will certainly increase the risk of an accident .

2. Proposed Service (secondary)entrance: [REDACTED]
[REDACTED] that leads along and into the proposed building site. This is marked for public footpath, [REDACTED]
Turning this into a 'service road' for deliveries and agricultural vehicle use. Would not only cause an increased potential hazzard, but also totally spoil the serenity and beauty we are used to.

3. [REDACTED]
In peace and tranquillity and relish the beautiful views across the river, uninterrupted and undisturbed.
We cannot see how this scheme would either enhance or sympathise with these stunning surroundings. It would spoil the aspect for all forever !

4. Ecology and landscape: the river, banks and fields around attract numerous species of plants, flowers and animals. We have experienced this firsthand. there are otters, Kingfishers (that have returned recently), numerous fish as we are fortunate to have fished the river.
I fear this building plan over several years will have such a damaging impact and potentially destroy the landscape. Surely birds, hares and the rare protected Otters will be scared away by the noise and disruption of the building work. The likelihood and huge moral question Are they ever likely to return ? '

I trust you will give consideration to my concerns, and that this holds genuine reason why a proposed scheme of this nature should be objected against.

Your sincerely

Nicola Gunn

From: [REDACTED]
Sent: 29 November 2021 14:53
To: Planning
Subject: Comment on planning proposal 3/2021/1008
Categories: xRedact & Upload

⚠ External Email

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FAO Laura Eastwood

Dear Sir/Madam,

I am writing regarding Planning Application No: 3/2021/1008 and would like to raise the following concerns over the proposed residential development :

With reference to the 'Ribble Valley Borough Council Core Strategy: A Local Plan 2008-2028' Policy DMH3 10.20
DWELLINGS IN THE OPEN COUNTRYSIDE AND AONB

- The proposed development does not appear to fulfil the criteria outlined for permitted development in areas of open countryside or AONB and contradicts the policy outlined that "The protection of the open countryside and designated landscape areas from sporadic or visually harmful development is seen as a high priority by the Council and is necessary to deliver both sustainable patterns of development and the overarching core strategy vision"

In addition, I would like to draw attention to the following policy DME4 10.15 PROTECTING HERITAGE ASSETS

and highlight concern over the potential effect of a development on this scale.

Given the scale of the project, the volume and duration of traffic disruption could potentially have a negative impact on the Grade II Listed Hodder Bridge, as access to the proposed development is in very close proximity to the bridge .

I would like to highlight a number of more general concerns

- **Ecology/Wildlife:** In light of the 'Ecological Appraisal Land at Hodder Bridge' report by Envirotech (2020) which states that;
 - "Ecological surveys, site appraisals and impact assessments were carried out with respect to land comprising open ground at Hodder Bridge, Withgill in Clitheroe. It is proposed that there will be the construction of a new residential dwelling with associated gardens and landscaping on site, however, exact plans are currently unknown"
 - Direct Impacts: 6.16.1 The River Hodder BHS is located adjacent to the site and River Hodder Section SSSI is connected to the section of River Adjacent. Site development has potential to directly impact upon these sites. Therefore precautionary mitigation is required to prevent this occurring and;

- 6.16.1 The River Hodder BHS is located adjacent to the site and River Hodder Section SSSI is connected to the section of River Adjacent. Site development has potential to indirectly impact upon these sites. Therefore precautionary mitigation is required to prevent this occurring.
- "Once exact plans are known, the impact on otter and water vole can be determined"

Have these specific issues now been addressed?

- **Traffic:** A development of this scale will involve a prolonged construction phase likely to last a number of years resulting in a significant impact on roads and parking. This is an area popular with walkers where parking issues already exist, further disruption will adversely impact local residents and potentially a heritage asset
- **Public Right of Way:** The quiet farm track directly opposite Hodder Court leading into the proposed development site is also a public footpath. Turning this into a service road directly contravenes RVBC Local Plan policy DMB5 10.27 which states that RVBC will work towards retention, maintenance and improvement of public rights of way and, "The Council considers the protection and enhancement of the footpath and bridleways network to be important given the character of the area and the contribution such networks can be made to leisure, health and tourism."
- **Setting:** The woodland walk opposite the proposed development is extremely popular with walkers and tourists. Given the landscape designation of 'Area of Outstanding Natural Beauty' and RVBC's own statement in the Core Strategy that the Ribble Valley " is characterised by and is loved for its rural quality [and] picturesque countryside" the proposed development, particularly given its magnitude and the duration of construction, will undoubtedly have an adverse effect on both local residents and visitors to the area.

I hope you will give due consideration to these concerns.

Yours faithfully,

Nicola Gunn

From: [REDACTED]
Sent: 29 November 2021 13:10
To: Planning
Subject: Planning application No:3/2021/1008

Categories: xRedact & Upload

⚠ 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.

Dear Laura Eastwood

I am writing to object to the above application at higher hodder bridge (field to the south)chipping rd chaigley clitheroe bb73lp on the following grounds.

- . Concerned for the Impact on the local wildlife habitat
- .Concerns regarding the amount of traffic locally if the work was to start
- .Concerns regarding the loss of parking for the many walkers and how that will impact on are residential parking ,we already have issues with the walkers using are parking facilities

Kind regards

[REDACTED]

Nicola Gunn

From: [REDACTED]
Sent: 25 November 2021 16:58
To: Planning
Subject: Planning application no.3/2021/1008 grid ref.3699334411046
Categories: xRedact & Upload

External Email

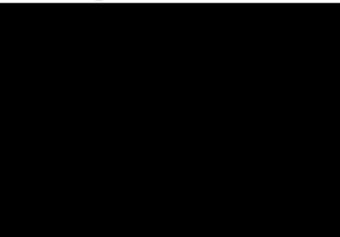
This email originated from outside Ribble Valley Borough Council. Do **NOT** click links or open attachments unless you recognize the sender and are sure the content within this email is safe.

Dear Laura Eastwood

I am writing to object to the above planning application at Higher hodder bridge (field to the south) Chipping Rd Chaigley Clitheroe Bb73lp on the following grounds

- Traffic and Parking: I think a development of this size in the area would impact heavily on the local traffic, as there would be prolonged use of machinery and the transport of supplies, as well as needing to transport workers etc. There are also plans to turn the parking spot at the bottom of the hill into a road, blocking parking space for the local walkers. [REDACTED] up by said walkers purely out of necessity, as they would have nowhere else to park, which could end up disrupting the community's ability to get to work.
- Impact on Local Wildlife: Concerns regarding the local wildlife, such as kingfishers, herons and birds of prey etc., and their habitat, that we regularly observe on family walks in the proposed area.

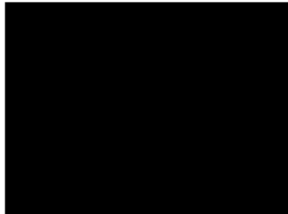
Kind regards



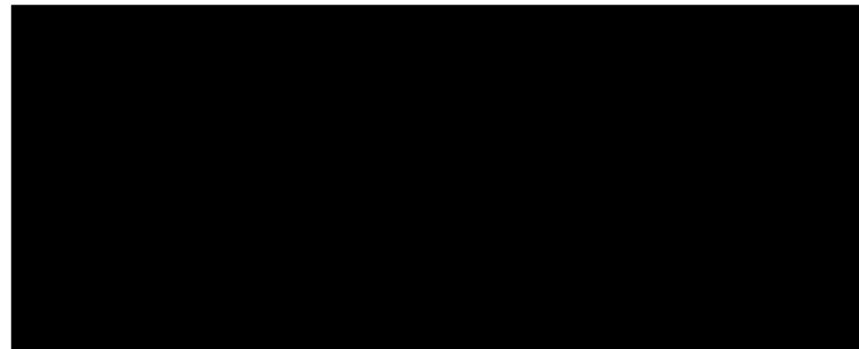
Nicola Gunn

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 24 November 2021 20:00
To: Web Development; Planning
Subject: Planning Application Comments - 3/2021/1008

Categories: xRedact & Upload



Is your address in Ribble Valley?: Yes



Locality:

County: Lancashire

uprn: 10022972214

usm: 31800045

ward: E05005296

Planning Application Reference Number: 3/2021/1008

Address of Development: Higher Hodder bridge
Chipping road
Chaigley
Bb7 3lp

Your Comments: Absolute nonsense [REDACTED]

[REDACTED] It is a disgrace and quite frankly disgusting

[REDACTED]

hard to stay in this area it is horrific to see the area being taken over by housing developments [REDACTED]

[REDACTED]

[REDACTED]

LANDSCAPE ARCHITECTURE
ENVIRONMENTAL PLANNING
MASTERPLANNING
URBAN DESIGN

**RANDALL
THORP** 
CHARTERED LANDSCAPE ARCHITECTS

Land near Hodder Bridge, Chaigley

Landscape Representations to
planning application reference
3/2021/1008

30 November 2021





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Project/ doc reference	924
Author	NJ
Checker	NJ
Format check	-
QM Status	Checked
Product Status	Confidential client issue
Check date	2021-11-30

Contents

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4. Summary and conclusions	13

1. Purpose and scope of note

- 1.1. Randall Thorp Landscape Architects have been commissioned [REDACTED] to undertake an independent review of a planning application which has been submitted to Ribble Valley District Council for a New House of Exceptional Quality (NPPF Paragraph 80e), with associated landscaping and biodiversity enhancement (herein referred to as the 'Proposed development'), at a site located near Hodder Bridge, Chaigley (herein referred to as 'the site'). The site lies within the Ribble Valley District Council (RVDC) jurisdiction and the Forest of Bowland Area of Outstanding Natural Beauty (AONB). The planning application reference is: 3/2021/1008.
- 1.2. The review will focus on the potential impacts of the proposal specifically upon:
 - Landscape character
 - Views
- 1.3. This note has been prepared by [REDACTED] has extensive experience preparing LVIA reports and is an experienced expert witness in relation to landscape and visual matters.

2. Planning policy context

- 2.1. The key planning policy context relevant to landscape and visual considerations, as set out in the planning application documentation, is as follows (not exhaustive):

National Planning Policy

National Planning Policy Framework 2021 (NPPF)

- 2.2. The application advises that it is advanced under Paragraph 80e of the NPPF. Para 80e states that:

“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

e) the design is of exceptional quality, in that it:

- is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and*
- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.*

- 2.3. The circumstances of both bullets under para 80e must be met for a scheme to comply with para 80e of the NPPF.
- 2.4. Bullet 1 refers to architectural quality which is not the focus of this landscape note.
- 2.5. Bullet 2 is directly relevant to landscape character and visual considerations. Compliance of the proposal with this bullet is considered in this note. It is relevant to consider that to comply with para 80e a scheme cannot simply **avoid** harm to the immediate setting, nor will **slight** enhancement meet the high bar set by the NPPF. Schemes must result in ‘significant’ enhancement to the immediate site setting.
- 2.6. Chapter 15 of the NPPF refers to ‘*conserving and enhancing the natural environment*’. Specifically, this seeks to ‘*enhance the natural and local environment by... protecting and enhancing valued landscapes... recognising the intrinsic character and beauty of the countryside*’. It goes on to state ‘*great weight should be given to conserving and enhancing landscape and scenic beauty in... Areas of Outstanding Natural Beauty*’.

Local Planning Policy

Ribble Valley Borough Council Core Strategy 2008-2028

- 2.7. The adopted Local Plan is the Ribble Valley Borough Council Core Strategy 2008-2028.

- 2.8. Of key relevance is Key statement EN2 Landscape which states:

'The landscape and character of the Forest of Bowland Area of Outstanding Natural Beauty will be protected, conserved and enhanced. Any development will need to contribute to the conservation of the natural beauty of the area.'

The landscape and character of those areas that contribute to the setting and character of the Forest of Bowland Area of Outstanding Natural Beauty will be protected and conserved and wherever possible enhanced.

As a principle the Council will expect development to be in keeping with the character of the landscape, reflecting local distinctiveness, vernacular style, scale, style, features and building materials.'

- 2.9. The policy emphasis complements chapter 15 of the NPPF in requiring development to conserve and enhance **natural beauty**. The policy sub-text explains that developers should adopt a non-standardised approach to design which recognises and enhances local distinctiveness, landscape character, the quality of the built fabric, historic patterns and landscape tranquillity.

Landscape Character Assessments – Local Level

- 2.10. The following Landscape Character Assessments are relevant to understanding the site in its context:

A Landscape Strategy for Lancashire (2000)

- 2.11. The site falls within character area 5 'Undulating low-land farmland', and sub-area 5b 'Lower Hodder and Loud Valley'.

Forest of Bowland Area of Outstanding Natural Beauty Landscape Character Assessment (2009)

- 2.12. The site falls within Landscape Character Type I. Wooded Rural Valleys, and landscape character area I7. Lower Hodder.

3. Review of the submitted Landscape and Visual Impact Assessment

Methodology

- 3.1. The Landscape and Visual Impact Assessment (LVIA) methodology is summarised in section 1.5 and presented in full in Appendix A.
- 3.2. The methodology presented is broadly in accordance with best-practice industry guidance contained in 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (2013), which is supported, however there are inconsistencies in how this methodology is applied and there is a lack of transparency within the report as to how some conclusions have been drawn in the assessment. For example:
 - In relation to the landscape receptor 'I: Wooded Rural Valleys LCT & I7 Lower Hodder LCA' section 4.1, table 4.2 presents only the baseline situation for this receptor (i.e. sensitivity). It makes no detailed assessment of the 'nature of effect' upon the receptor, nor does it go on to explain how the sensitivity and the nature of effect have been combined to conclude the overall effect. It is noted that the executive summary of the report does include these conclusions, but the thinking and evidence behind this is not presented in the main body of the LVIA. This is critical information as when referring to the Appendix A methodology, Figure 1, the combination of a 'high' sensitivity and 'low' nature of effect (as the executive summary states for both the national and local landscape character) does not automatically result in a 'negligible' effect. According to Figure 1, this is more likely to result in a 'low' nature of effect.
 - The assessment presents no explanation of 'susceptibility' of receptors. According to the methodology this should be clearly explained as being high, medium, low or very low. This lack of transparency makes it difficult to understand how conclusions have been drawn.
 - The assessment does not consider 'magnitude of change' at each stage of development (i.e. construction, completion, and 10 years post-completion). Table 4.4 generalises 'magnitude of change' as 'medium to high', however no evidence is presented to establish how this has been considered. According to the methodology considerations of scale or size of the degree of landscape change, geographical extent, and duration of effect should be made and explained to give a reader a clear understanding of how conclusions regarding magnitude of change have been reached.
 - In relation to assessing the visual effects of the proposal, section 5.1 acknowledges that GLVIA3 advises that it is good practice to undertake visual assessments during the winter months to present a worst-case scenario for visual effects. It is acknowledged that the LVIA does not do this. For a site of this sensitivity (i.e. greenfield and located within an AONB) winter photography should be considered essential to appropriately assess the visual impacts of the proposal. It is also recommended that 'verified photomontages' should be requested from the applicant to provide a true

representation of the scale and appearance of the proposal in its immediate setting. The illustrative material presented as part of the application should not be relied upon to provide a true representation of the scale and appearance of the proposal when viewed from nearby visual receptors.

- In considering visual 'receptors' the LVIA takes an unusual approach by considering each viewpoint as a receptor in its own right. Typically, an LVIA would use viewpoint photographs to represent views as experienced from various 'receptors' which could include roads or Public Rights of Way (PRoW). With these 'linear' types of receptors the LVIA would typically consider the effects upon the receptor in its entirety.

Methodology regarding significance

- 3.3. The methodology presented at Appendix 4 is clear and transparent on how to assess landscape effects, and crucially, their 'significance'. At page 53 the LVIA states (my emphasis):

"It is important to clarify that any effects which are assessed to be 'slight' or 'not significant' are considered to be 'non-important'. Effects assessed as 'moderate' may be considered to be important but must be supported by reasoned justification."

- 3.4. This is a useful guide when making judgements and drawing conclusions about whether the scheme will 'significantly enhance its immediate setting' as required to demonstrate compliance with NPPF Para 80e, and whether the scheme will protect, conserve and enhance the landscape and character of the Forest of Bowland AONB as required to demonstrate compliance with Core Strategy Key Statement EN2.

Description of the proposal

- 3.5. Section 1.7 of the LVIA presents an explanation of the proposed development. This includes a summary of 'landscape enhancements'. The terminology used here is misleading. A more appropriate title would be 'landscape treatments'. At this stage in the report no assessment has been made to establish the existing baseline landscape character of the site and its setting, nor whether the proposed landscape treatments would constitute 'enhancements'.

Baseline assessment

- 3.6. In establishing the baseline character of the site at section 3, the LVIA refers to national and local landscape character assessments. The most up to date assessments are used, however it is noted that no reference is made to the local landscape character assessment 'A Landscape Strategy for Lancashire' (2000).
- 3.7. Section 3.4 considers landscape designations in the context of the site. It is noted that there are some omissions of relevant information here, including:
- Listed buildings and structures – advises limited intervisibility between the site and Grade II Listed Hodder Bridge. The Google Earth extract below indicates that the development could be visible from the Bridge in winter months. The bridge has historic interest and, according to local historians, is thought to be the bridge where Oliver

Cromwell took his army across the River Hodder in 1648 on his way to Stonyhurst College where he famously stayed the night in the Hall. This historic association makes visitors to the bridge more likely. These visitors are likely to have an interest in observing this architectural feature in its setting.



Figure 1 Google Street View from Hodder Bridge

- Countryside and Rights of Way / Registered Common Land – the LVIA does not identify that the PRoW network to the south of the site forms a well-utilised link to the promoted route of the 'Tolkien Trail'. The established footpath network to the south of the River Hodder also extends beyond the PRoW network, including permitted routes along the riverbank to the south-east of the site. Views from this route were not considered in the LVIA.
- 3.8. At section 3.5, the LVIA presents what appears to be a true picture of the existing character of the site and its setting. Most importantly, this section demonstrates that the character and appearance of this site itself has remained unchanged since 1886. There has been no loss of landscape features, nor are there any indications that the site has degraded in any way since 1886.
- 3.9. Figure 3.10 on page 27 is a photograph taken from the location of the proposed dwelling, taken at human eye level. Longridge Fell is visually prominent in this view, indicating that the proposed house is likely to be visually prominent in views from the Fell.

Analysis of landscape effects

I: Wooded Rural Valleys LCT & 17: Lower Hodder LCA

- 3.10. As already established, the LVIA does not provide a clear and transparent explanation of how conclusions have been reached when considering the potential effects on this landscape receptor, however the overall outcome of 'high' sensitivity is considered to be appropriate.
- 3.11. In the absence of a clear and transparent methodology, it is challenging to understand if the 'low' nature of effect, and subsequent resulting overall 'negligible' nature of effect on this landscape receptor is justifiable and appropriate.

The site and the immediate setting

- 3.12. The LVIA considers at table 4.3 that the site and its immediate setting is of high sensitivity, high landscape condition and high landscape value. I consider this to be an appropriate assessment, and consider that a receptor scoring 'high' across all areas is **not** indicative of a landscape which requires, or would significantly benefit, from enhancement.
- 3.13. The LVIA considers at table 4.4 that the construction phase of the development would result in a 'low neutral' level of effect on the basis that this is an 'agricultural landscape'. This conclusion is challenging to comprehend for a tranquil and rural site which has remained unchanged since 1886.



Figure 2 View across the site from PROWLA/3-20/1

- 3.14. The LVIA considers that effects at completion would be worse than construction effects, increasing to 'moderate adverse' effects. The improvement of effect to 'slight beneficial' at 10 years post-completion is stated to be due to the maturity of soft landscape proposals as a result of which *'impacts upon landscape character will be decreased'* and benefits to biodiversity. This assessed residual effect, while arguably falling short of harm and complementing local character, would without doubt fall short of the 'significant' enhancement to the immediate setting of the site which would be required to meet the criteria of NPPF Para 80e.
- 3.15. It is my professional opinion that the landscape proposals for the site are **not required** as the site has already been established to be of high value, high sensitivity and high landscape condition. The landscape proposals do not provide enhancement to a degraded landscape or a landscape which has lost important features. The landscape proposals provide mitigation for the addition of a new building upon the site, rather than for the enhancement of landscape character. While the proposals are arguably not out of character with the wider locality, the loss of openness and introduction of large-scale built form to this part of the AONB would most likely result in a degree of harm to the local landscape character and immediate setting of the site.

Analysis of visual effects

- 3.16. In general, the assessment of potential visual effects in section 6 of the LVIA is not transparent about how conclusions have been reached. No information is provided regarding how susceptibility or value have been considered when establishing the overall significance of effect.

- 3.17. Viewpoints 01 and 02 both consider effects upon the PROW LA/3-20/1 which passes through the site itself. In both instances the residual effect on the PROW are found to be 'moderate adverse' or 'minor to moderate adverse'. These effects would not amount to significant enhancement of the immediate setting of the site, and according to the methodology at Appendix A could potentially be considered as 'important' levels of harm.



Figure 3 View from PROW LA/3-20/1

- 3.18. Table 6.3 summarises the assessment of potential visual effects to viewpoint 4, which is the PROW located to the south of the River Hodder. As previously mentioned, the LVIA does not include any assessment of the well-utilised permitted route which extends from the PROW network to the east, along the banks of the River Hodder, and which provides an important footpath link to and from the regionally promoted 'Tolkien Trail'. Due to its links to the 'Tolkien Trail', the sensitivity of the PROW receptor should be raised from 'medium to high' to 'high' (*'a unique or recognised high-quality view, well frequented and/or promoted as a beauty spot/visitor destination'*). This has potential to increase the assessed residual visual effect from 'minor to moderate adverse' to 'moderate adverse', which according to the methodology could potentially be considered as an 'important' level of harm. This would not amount to significant enhancement of the immediate setting of the site.



Figure 4 View from PROW LS/-3/48a

- 3.19. Residual visual effects on viewpoints 5 and 7 are considered to be 'negligible neutral' and 'neutral' respectively. Neither of these effects amount to significant enhancement of the immediate setting of the site.
- 3.20. It is my professional opinion that the visual effects presented within the LVIA have established that there will be some harm arising to views as a result of the proposed development. Due to omissions in the assessment and use of late-summer photography there is also potential that the harm to views from some receptors may be greater than is stated. On the basis of the LVIA assessment, it is clear that no receptors will experience 'significant' enhancement as a result of the development and associated landscape mitigation proposed.

4. Summary and Conclusions

- 4.1. Paragraph 80e of the NPPF requires a proposed development to '*significantly enhance its immediate setting*'. The wording of para 80e makes it clear that an absence of harm is not enough to justify development of isolated homes in the countryside. Schemes must demonstrate not only enhancement, but '*significant*' enhancement of the immediate setting of a site to comply with para 80e.
- 4.2. Ribble Valley Core Strategy Key Statement EN2 seeks to protect, conserve and enhance the landscape character of the Forest of Bowland AONB. Specifically, it requires any development to '*contribute to the conservation of the natural beauty of the area*'.
- 4.3. In relation to landscape character, it is considered that the landscape proposals for the site are **not required** as the site has already been established to be of high value, high sensitivity and high landscape condition. The landscape proposals do not provide enhancement to a degraded landscape or a landscape which has lost important features. The landscape proposals provide mitigation for the addition of a new building upon the site, rather than for the enhancement of landscape character. While the proposals are arguably not out of character with the wider locality, the loss of openness and introduction of large-scale built form to this part of the AONB would most likely result in a degree of harm to the local landscape character and immediate setting of the site.
- 4.4. The natural beauty of the site, which presents as a pleasant and open riverside field, has remained unchanged since 1886. This natural beauty would be altered by the proposals. This unnecessary change (mitigation for built form) would not amount to '*conservation*' of the natural beauty of the area as Key Statement EN2 seeks to achieve. On this basis the proposal is found to conflict with Core Strategy Key Statement EN2.
- 4.5. In relation to visual effects, the submitted LVIA has established that there will be some harm arising to views as a result of the proposed development. Due to omissions in the assessment there is also potential that the harm to views from some receptors may be greater than is stated. On the basis of the LVIA assessment, it is clear that no receptors will experience significant enhancement as a result of the development and associated landscape mitigation proposed.
- 4.6. The LVIA concludes that the site '*is able to successfully accommodate the proposed development in landscape and visual terms without having an overall unacceptable effect or loss of landscape character or visual amenity*'. This avoidance of significant harm falls somewhat short of '*significant enhancement*' which is required by para 80e.
- 4.7. On the basis of the above, no evidence has been found within the application to demonstrate that the scheme will result in '*significant enhancement*' of the immediate setting of the site, as such it is considered that the proposed development would **not** accord with NPPF Para 80e, bullet 2.

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Hello Chris,

We would by to provide consultation on the Submitted 'Pre-Application Brief Biodiversity ations Document' for the Hodder Bridge application (Ref: 3/2021/1008

Inputting theat Creation Proposals post-development details in (Appendix 2 of the documeniversity Calculations Document) in to the approved Defra Metric 3.0, producey different results to that stated (see attached document).

I hope that thove will suffice in the interim, and we will provide further details, where requint a later date.



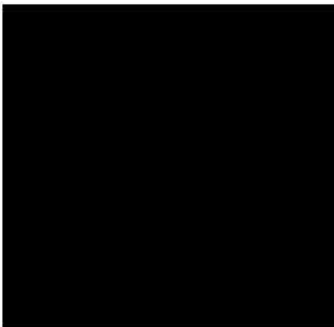
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26th November 2021



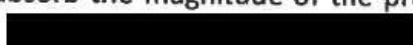
Planning Application No: 3/2021/1008


Grid reference: 369933 441046

Proposal: Proposed new house of exceptional quality (NPPF paragraph 80e) of Passivhaus Plus and Zero Energy design with associated landscaping and biodiversity enhancements.

Dear Sir/ Madam,

We are writing to register our objection to the proposed development of Hodder Grange.

We were shocked to receive the letter outlining the significant proposed development  Understanding that this has been at least 2 years in the planning,  Being given such a short time to absorb the magnitude of the proposed development and the impact on life as we know it.  trying to comprehend why anyone would want to build on arguably one of the most beautiful fields in the Ribble Valley. It is a jewel in its crown.



The field is set within an area of outstanding natural beauty, it is a haven for wildlife and is the backdrop to a favourite river walk for countless people. The pandemic and subsequent enforced lockdowns showed more than ever how priceless these natural wildernesses are for everyone's mental health. We cannot tell you the amount of people who stop us on a regular basis as we walk along the river and remark how lucky we all are to have such places of beauty on our doorstep. As Clitheroe continues to be overwhelmed with housing developments, these areas of Outstanding Natural Beauty surrounding our special town are peace havens and should be protected more than ever.

Although superficially the watercolour pictures and positive language surrounding the design for this proposed manor house may seem impressive, we have felt compelled to seek several experts' opinions to understand the implications of such a build on the landscape, wildlife and wider community. We have included their opinions and reports to be read as part of this letter.

Our main points of objection and concern are:

* We feel the proposed watercolour drawings are misleading in how they portray the property nestled into the field. We feel the actual size of it would be more imposing and we would like to pursue CGI imagery to allay our doubts. We feel the scale and height of the property will have a dominating visual impact on the landscape, particularly for those walking the footpath on the other side of the river.

*We do feel it is morally wrong that this field, with no existing buildings and marked as agricultural land in an AONB, could be allowed to be changed to domesticity, especially one of this size and significance.

Children play on the lane, and it is popular with dog walkers, so any increase in traffic would be hugely disruptive and dangerous for such a narrow track.

We are very concerned that the proposed secondary road looks as if it would be a busy back entrance for stable traffic and that workmen and tradesmen would be directed onto a lane that could not support such an increase in traffic volume.

*Proposed planting of evergreen trees blocking sweeping views to the river. The trees specified on the proposal are not indigenous to the area. The beauty of where we live is in the various and changing colours of the trees on the hillside opposite and along the river edge. By planting evergreens, the landscape will change unrecognisably. We feel the choice of trees is purely to create privacy and not to enhance the beauty of the natural environment.

*Impact on local wildlife environment. we have had many magical moments encountering the wildlife that surrounds us. In May we had an otter at 7.30 am, one morning (see photos attached) The otter would have made his way up to us through the field due to be developed.

A local conservationist has also advised us that a semi improved field could potentially be used by foraging Noctule bats, as many bats live in the area. So, we feel environment impact should be seriously considered on such a sensitive site so rich in wildlife.

The timid kingfishers are appearing more often along the river and if spotted always create much excitement. We do also have a resident barn owl affectionately named "Barney" in the area but we are unsure where he sleeps, we have huge concern that these animals and birds who have been here for many years would undoubtedly move on with such huge disruption.

Again, it should be noted, that otters were not noted during the ecology report; our photos prove otherwise.

*Historical significance.

We were delighted to see the River Hodder featured as a prized AONB, on the BBC's Best River Walks earlier in the year. It journeyed through some of the region's most glorious scenery including the Tolkien trail which the public footpath opposite the proposed Hodder Grange leads to. It was fascinating to hear the curator of Stonyhurst college enthusiastically distinguishing the facts between the fiction surrounding 'Cromwell's Bridge' and the Lord of the Ring's connections to the area. Very interestingly explained that the

Higher Hodder bridge (where Hodder Grange will be accessed) was much more likely to be the bridge where Oliver Cromwell took his army across the River Hodder in 1648 on his way to Stonyhurst College, where he famously stayed the night in the Hall. The old 'Cromwell bridge' named after Oliver Cromwell would not have been wide enough to carry the horses and soldiers across. It is very likely that this tranquil stretch of water holds many other historical secrets, and we feel its natural beauty should be retained for that alone.

*The proposed land use change could pose an increase in downstream flood risk, which again is not possible to determine from the information provided.

*We have been advised that the biodiversity Metric calculation is submitted in a format that differs from the standard Natural England format in appearance, but also in anticipated content. There is not a map of the baseline or post-proposed development habitat types to be able to determine whether the proposed mitigation is sufficient and Net Gain achieved.

* There is no detail provided on how the habitats will be managed for the 30-year period required under the legislation relating to biodiversity Net Gain.

* The statement in the ecological appraisal 6.10.4 - that the streams are unlikely to support fish is incorrect. Eels and other fish species have been identified in the streams present on site. Otters have been sighted within the immediate locale of the proposed development, and the ecological appraisal caveat around when the survey was undertaken and preceding weather conditions are important, as we would expect significant evidence of otter presence to be found in normal conditions.

*The applicants possible use of helicopters in their new proposed development is also concerning to us, we believe the construction work will be detrimental to the wildlife on the river, but after construction the light pollution and sound pollution from a development of this size will be catastrophic. The change in use of the field from agriculture to domestic would also mean the owners have limitless permission for landings anywhere in the field. (Usually, helicopters are limited to a certain number of landings per year outside of their curtilage.)

* Walkers currently park in the layby by the bridge: there are concerns that the new development might curtail the layby in order to give better access to the estate. Residents already struggle for parking at Hodder Bridge Court and there is concern that parking problems will increase, especially with potential construction traffic and labourers in the coming years also needing to park.

*The proximity of the main drive to the river, not only will have detrimental impact on the wildlife but perhaps most significantly be at great risk of flooding. At no point could the lane to the front of our property support the traffic from a house of this size.

* We are acutely aware that the planning application is reminiscent of the Sawley build. We have been talking to many residents of Sawley, who have said many promises were made pre-planning consent and once permission was granted, sadly these promises were not met. Most consider its presence to be anything but an enhancement to the surrounding area.

We have been advised by [REDACTED] acknowledged as the UK's leading authority on the geology of Bowland, who has made the following comments about the proposal.

He said that "the ecology report should have been assessed in the four seasons and not just in the winter. With the river in full flow many species of flowering plant that can only be seen easily in spring and summer, such as orchids, may have been missed at the time of the survey. When the river is at normal heights, or below, shingle banks and pools provide feeding sites for wagtails and plovers. Rocks exposed in mid-stream provide perches and feeding sites for dippers and kingfishers. When in leaf, overhanging trees not only shed insects for fish to feed on but even in winter, their exposed roots and branches provide perches for kingfishers to feed from. Curlews occur in this area and are likely to visit. Fish eating ducks such as goosander breed and feed on the river during spring and summer. There is no mention in the report of the migratory fish that come up and down the river and in some cases enter tributaries and watercourses. Salmon, sea trout, lampreys and common eel (now endangered) are amongst these. Other fish that require good water oxygenation, such as stone loaches also occur.'

Flood risk. "A monitoring station for recording river levels nearby to the site is at Hodder Place. The website can be found here. <https://riverlevels.uk/hodder-great-mitton-hodder-place#.YZ-7VcfP02w>. It records the highest level ever recorded as: **The highest level ever recorded** at the River Hodder at Hodder Place is 2.86m, reached on Thursday 23rd October 1980 at 12:45pm. It is important to realise that the monitoring station has only been operational since the 1970's. The River Hodder catchment drains a wide area of moorland and steep sided valleys which can result in producing flash flooding during extreme rainfall events. Whereas Stocks Reservoir can act as an upstream buffer to some of these events, it needs to be borne in mind that the reservoir has nearly been overtopped in the past (August 8th 1967- Reference: HYDRAULICS RESEARCH STATION. *Forest of Bowland and Pendle Floods of August 1967*. HRS Report Ex. 382, HRS Wallingford, 1968). With the increased risk of extreme rainfall events, due to climate change, it cannot be ruled out that extreme flood events could impact on the proposed site within the expected lifetime of the building."

"In addition, there is a possible phosphate and nitrate leakage risk into the adjacent watercourses and River Hodder. It is important that the proposed package treatment plant does not add to the phosphate and nitrate burden of adjacent water courses and river, either by direct leakage, or through the subsurface."

Most significantly [REDACTED] found the ecological report lacking in many regards.

We sought the advice of another river expert, and they too were concerned building a house of this size on a flood plain. [REDACTED] who is a keen fisherman told us that he has known the river to flood on this field 3 times in the last 50 years. He said each were one offs, but his advice for the way the climate is changing is to expect more of these one-off floods. With wetter winters and dryer summers floods are changing and becoming more serious. He too remembered the flood on 8th August 1967 where Stocks reservoir nearly broke, he spoke about that day with grave caution. It would have been a devastating blow for everything down river.

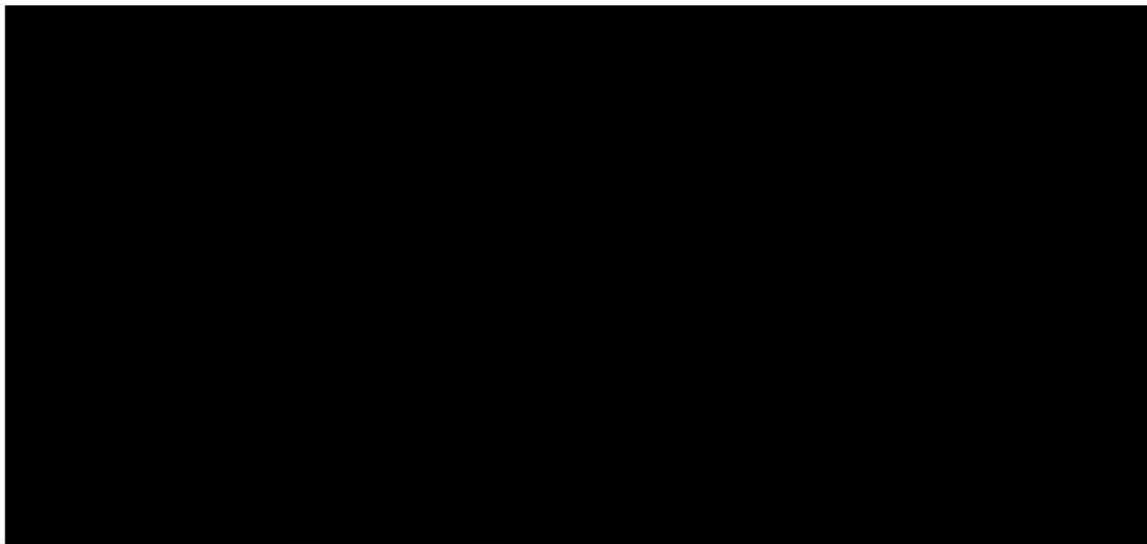
He said the river needed more room and although the floods may not have come as high as the proposed build before now, the climate crisis means the past could not be a guide to the future.

We are obviously deeply appreciative of the natural beauty of the place where we live but we are also ultimately concerned for the precedent it sets if this application is granted. Development can never be reverted and we in the Ribble Valley are at a tipping point of spoiling one of the most beautiful areas in the country.

In truth some green fields across the country may be significantly enhanced by a project of this magnitude, but this field in an AONB, is already breathtakingly stunning and steeped in history (and legend) we believe any change in use would detract from the beauty of this natural paradise.

We care passionately about our local environment and everyone we have spoken to agrees that the area does not need this development. All have been shocked and there is a feeling of despair, even by those not intending to object.

Yours Sincerely



CW Planning Solutions Ltd. Reg. No. 9669025
Chris Weetman BA (Hons) DMS MRTPI Chartered Town Planner

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The logo consists of the letters 'CW' in a bold, white, sans-serif font, centered within a blue rounded square.

Planning Solutions
Ltd.

30/11/2021

Dear Sir and Madam,

Holding Objection on behalf of Lancaster of Hodder House, Hodder Lane, Hodder Bridge regarding Application 3/2021/1008, Proposed new house of exceptional quality (NPPF Paragraph 80e) of Passivhaus Plus and Zero Energy design with associated landscaping and biodiversity enhancements.

1.0 Introduction

1.1 This 'holding' objection is made with regard to the timescales of the planning application submission. The application as identified above, was registered on the 9th of November 2021 and the timeframe for neighbour responses is the 30th of November 2021.

1.2 This is insufficient time for those wishing to object to such an important application in an AONB, to properly submit their full response and associated evidence, especially as there appears to be significant gaps in the submitted documentation which supports the application. As such this objection is notification of further information and analysis which is to follow on behalf of the objector

2.0 Executive Summary

2.1 Notwithstanding, and in addition to the considerable number of procedural issues identified in section 3 above, this submission concludes that the proposal fails to meet the very high tests set out in paragraph 80 of the NPPF as follows:

2.2 the design is of exceptional quality, in that it:

- is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and

- would significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area.

2.3 To be paragraph 80 compliant the proposal has to meet ALL those tests.

2.4 The scheme has to be truly outstanding, in other words exceptional in its design. This proposal is simply country house number 26 in and in the vicinity of the Trough of Bowland. Whilst it is well designed in itself and has 'passive credentials that is not enough in itself. In many respects its 'passive credentials will soon become the norm as development continues to have to meet ever challenging sustainability targets and criteria.

2.5 To be paragraph 80 compliant the scheme also has to raise standards of design in rural areas. It is not understood how a mansion house will influence the limited development that is allowed in the AONB and open countryside having regard to the limitations of the Council's development plan policies.

2.6 To be paragraph 80 compliant the proposal has to significantly enhance its immediate setting. Independent assessment concludes that the proposal does not, indeed even the application submission talks about minimising harm, not significantly enhancing the setting> even simply enhancing the setting would not itself be enough to be para 80 compliant as the key test is the word 'significantly'

2.7 Finally the scheme has to be sensitive to the defining characteristics of its setting. Its key characteristics are its openness and its relationship with the river, the woodland and the surrounding natural countryside, which would be significantly altered, and not for the better, as a result of this application were it to be allowed in its current form.

2.8 As part of this initial process we have canvassed a professional analysis of the ecology submission, and that analysis has expressly stated that the submitted Ecology report and methodology is fundamentally flawed and we are seeking a full 3rd party expert opinion, on the matter as quickly as can be done properly.

3.0 Procedural issues

3.1 Whether a Major Development or Not?

3.1.1 There are three thresholds for assessing whether an application is for a 'Major' development or not. The DMPO is the first threshold. However, the NPPF has two other thresholds depending on the issues under consideration.

3.1.2 The first relates to AONBs and paragraphs 176 and 177 which allow for the decision maker to determine whether a proposal is for a major development or not. It is not understood whether this has been properly assessed in this context as the objectors have not been able to assess the pre-application consultation response.

3.1.3 The second is in relation to the definition for when an affordable housing contribution is required. That threshold as defined by Annex 2 of the 2021 NPPF is for residential development of 10 or more dwellings **OR** sites of over 0.5ha. This site is over 0.5ha therefore an affordable housing contribution is required. This can be either in the form of on-site affordable housing or an off-site contribution based on the market value of the property.

3.1.4 The Council's own Memorandum on the subject states:

" In all other locations in the borough on developments of 5 or more dwellings (or sites of 0.1 hectares or more irrespective of the number of dwellings) the council will seek 30% affordable units on the site."

3.15 the application submission appears not to address this issue.

3.2 Certificate A

3.2.1 The application is submitted with a signed Certificate A and the application is accompanied by a red edge in relation to the application site. However, as part of the submission, the applicants refer to the use of Hodder Lane as a secondary access to serve the stables element of the submission. The submitted plans show a curving road that ends at an existing field access gate which then goes onto a grassed track and then onto the tarmacked but private Hodder Lane. (See photograph below) Clearly the trees shown on the plans are under threat by the proposal, and although they fall outside of the application site, the forms state no trees are affected by the proposed development.



3.2.2 If it is intended that this be used to serve the new dwelling, in any capacity, whether as a secondary access or not, notice should have been served on the owner of the road, or it should be deleted from the scheme. I refer the Council to the relevant section of the PPG as follows:

“What information should be included on a location plan? A location plan should be based on an up-to-date map. The scale should typically be 1:1250 or 1:2500, but wherever possible the plan should be scaled to fit onto A4 or A3 size paper. A location plan should identify sufficient roads and/or buildings on land adjoining the application site to ensure that the exact location of the application site is clear.

The application site should be edged clearly with a red line on the location plan. It should include all land necessary to carry out the proposed development (e.g., land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings). A blue line should be drawn around any other land owned by the applicant, close to or adjoining the application site.”

Paragraph: 024 Reference ID: 14-024-20140306

Revision date: 06 03 2014

3.2.3 If there are two access points associate with the proposed development both should comply with the above.

3.3 Section 8 Public Rights of Way

3.3.1 Whilst the proposal does not close a PROW, as the photograph over shows, the applicants since owning the land have fenced off their new acquisition thereby limiting the width of the PROW. This is a matter that is currently being discussed with LCC PROW officer, and another reason why a holding objection is applicable in this instance. The PROW has now bene reduced to in places around 1.2m between the barb wire fence and the wall when the minimum should be not less than 1.5m.

3.3.2 It should be noted that the new barb wire is on the outside of the posts thereby putting any users of the PROW at risk of harm from it.



3.4 Flood Risk and Drainage

3.4.1 The application states that the development is not in a Flood Risk Zone and is not within 20m of a watercourse.

3.4.2 The application is not just for a house, it is for a new house, stables, courtyard, garden room, pergola, formal gardens and informal gardens, etc as such the application is the whole package. Part of the consideration of the application should consider the whole development in relation to the potential effect on the Flood Risk Zone and the River Hodder. This includes a drainage strategy and how the development, including the landscaped gardens, will be drained and how that impacts the aforementioned FRZ and river.

3.4.3 With this in mind, the Council should bear in mind the EA advice about drainage as per the attached link

https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fgovernment%2Fuploads%2Fsystem%2Fuploads%2Fattachment_data%2Ffile%2F692989%2FEnvironment-Agency-approach-to-groundwater-protection.pdf&data=04%7C01%7C%7Cee935fbfb904ff67b7e08d9b356397d%7C84df9e7fe9f640afb435aaaaa%7C1%7C0%7C637738005345854109%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C3000&sdata=c6uVFSxVO6uXetF%2Baaq6begiWiiL5hUnVWr3Vj4CFas%3D&reserved=0

3.4.4 The applicant states that the development is outside of the flood zone, however, part of the development falls into the flood risk zone 2. It is not possible from the submission to determine to what extent but does raise questions as to whether an FRA is required? The Council must be satisfied about this important issue, and if not satisfied should request further information to clarify.

3.4.5 The proposal could pose an increase in downstream flood risk, which again is not possible to determine from the information provided.

3.5 Ecology/Biodiversity

3.5.1 The biodiversity Metric calculation is submitted in a format that differs from the standard Natural England format in appearance, but also in anticipated content. There is not a map of the baseline or post proposed development habitat types to be able to determine whether the proposed mitigation is sufficient and Net Gain achieved.

3.5.2 There is no detail provided in the submission, on how the habitats will be managed for the 30-year period required under the legislation relating to Biodiversity Net gain.

3.5.3 We also have questions relating to the tree planting scheme, where they plan to plant a species not indigenous to the local area. Do they need a permit for planting within the "easement"?

3.5.4 The statement in the ecological appraisal 6.10.4- that the streams are unlikely to support fish is incorrect. Eels and other fish species have been identified in the streams present on site. Otters have been sited within the immediate locale of the proposed development, and the Ecological Appraisal caveat around when the survey was undertaken and preceding weather conditions are important, as we would expect significant evidence of otter presence to be found in normal conditions.

3.6 Highways

3.6.1 Maybe I am missing something with the submission; however, I cannot see any plan showing the access point to the highway, and whether that and any part of the access road is within the Flood Risk Zone.

3.6.2 There is no detail of the main access to the public highway, no detail about materials to be used, no details of any gates or fences proposed.

3.6.3 It is highly unlikely that the current arrangement as per the photograph over the page, would suffice for a scheme of this magnitude. Given its proximity to a Listed Bridge this cannot be excluded from the determination of this application.



4.0 Policy Context

Whether there is any policy support is a considered as follows:

NPPF Paragraph 80

Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;

b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

c) the development would re-use redundant or disused buildings and enhance its immediate setting;

d) the development would involve the subdivision of an existing residential building; or

e) the design is of exceptional quality, in that it:

- is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and

- would significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area.

The submitted D & A submission makes the following statement on page 18 "Introduced in 1997, the policy provides an opportunity to secure permission for new country houses (and other development) to continue and add to the tradition of building stately homes in the English countryside." It is not understood what Policy this is in reference to; it certainly is not in reference to the NPPF.

Ribble Valley Development Plan

The Council's Core Strategy states the following:

KEY STATEMENT EN2: LANDSCAPE

The landscape and character of the Forest of Bowland Area of Outstanding Natural Beauty will be protected, conserved and enhanced. Any development will need to contribute to the conservation of the natural beauty of the area.

The landscape and character of those areas that contribute to the setting and character of the Forest of Bowland Areas of Outstanding Natural Beauty will be protected and conserved and wherever possible enhanced.

As a principle the Council will expect development to be in keeping with the character of the landscape, reflecting local distinctiveness, vernacular style, scale, style, features and building materials.

KEY STATEMENT EN4: BIODIVERSITY AND GEODIVERSITY

The Council will seek wherever possible to conserve and enhance the area's biodiversity and geodiversity and to avoid the fragmentation and isolation of natural habitats and help develop green corridors. Where appropriate, cross-Local Authority boundary working will continue to take place to achieve this.

Negative impacts on biodiversity through development proposals should be avoided. Development proposals that adversely affect a site of recognised environmental or ecological importance will only be permitted where a developer can demonstrate that the negative effects of a proposed development can be mitigated, or as a last resort, compensated for. It will be the developer's responsibility to identify and agree

an acceptable scheme, accompanied by appropriate survey information, before an application is determined. There should, as a principle be a net enhancement of biodiversity.

These sites are as follows:

- Sites of Special Scientific Interest (SSSIs)
- Local Nature Reserves (LNRs)
- Local Biological Heritage sites (CBHs)
- Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)
- Local Geodiversity Heritage Sites
- Ancient Woodlands
- Lancashire Biodiversity Action Plan priority habitats and species
- European Directive on Protected Species and Habitats - Annexe 1 Habitats and Annexe II Species
- Habitats and Species of Principal Importance in England

With respect to sites designated through European legislation the Authority will be bound by the provisions of the relevant Habitats Directives and Regulations.

For those sites that are not statutorily designated, and compensation could be managed through a mechanism such as biodiversity off-setting via conservation credits.

POLICY DMG1: GENERAL CONSIDERATIONS

10.4 IN DETERMINING PLANNING APPLICATIONS, ALL DEVELOPMENT MUST: DESIGN

1. BE OF A HIGH STANDARD OF BUILDING DESIGN WHICH CONSIDERS THE 8 BUILDING IN CONTEXT PRINCIPLES (FROM THE CABE/ENGLISH HERITAGE BUILDING ON CONTEXT TOOLKIT.
2. BE SYMPATHETIC TO EXISTING AND PROPOSED LAND USES IN TERMS OF ITS SIZE, INTENSITY AND NATURE AS WELL AS SCALE, MASSING, STYLE, FEATURES AND BUILDING MATERIALS.
3. CONSIDER THE DENSITY, LAYOUT AND RELATIONSHIP BETWEEN BUILDINGS, WHICH IS OF MAJOR IMPORTANCE. PARTICULAR EMPHASIS WILL BE PLACED ON VISUAL APPEARANCE AND THE RELATIONSHIP TO SURROUNDINGS, INCLUDING IMPACT ON LANDSCAPE CHARACTER, AS WELL AS THE EFFECTS OF DEVELOPMENT ON EXISTING AMENITIES.
4. USE SUSTAINABLE CONSTRUCTION TECHNIQUES WHERE POSSIBLE AND PROVIDE EVIDENCE THAT ENERGY EFFICIENCY, AS DESCRIBED WITHIN POLICY DME5, HAS BEEN INCORPORATED INTO SCHEMES WHERE POSSIBLE.
5. THE CODE FOR SUSTAINABLE HOMES AND LIFETIME HOMES, OR ANY SUBSEQUENT NATIONALLY RECOGNISED EQUIVALENT STANDARDS, SHOULD BE INCORPORATED INTO SCHEMES.

ACCESS

1. CONSIDER THE POTENTIAL TRAFFIC AND CAR PARKING IMPLICATIONS.
2. ENSURE SAFE ACCESS CAN BE PROVIDED WHICH IS SUITABLE TO ACCOMMODATE THE SCALE AND TYPE OF TRAFFIC LIKELY TO BE GENERATED.

Core Strategy Adoption version

3. CONSIDER THE PROTECTION AND ENHANCEMENT OF PUBLIC RIGHTS OF WAY AND ACCESS. AMENITY
 1. NOT ADVERSELY AFFECT THE AMENITIES OF THE SURROUNDING AREA.
 2. PROVIDE ADEQUATE DAY LIGHTING AND PRIVACY DISTANCES.
 3. HAVE REGARD TO PUBLIC SAFETY AND SECURED BY DESIGN PRINCIPLES.
 4. CONSIDER AIR QUALITY AND MITIGATE ADVERSE IMPACTS WHERE POSSIBLE.

ENVIRONMENT

1. CONSIDER THE ENVIRONMENTAL IMPLICATIONS SUCH AS SSSIS, COUNTY HERITAGE SITES, LOCAL NATURE RESERVES, BIODIVERSITY ACTION PLAN (BAP) HABITATS AND SPECIES, SPECIAL AREAS OF CONSERVATION AND SPECIAL PROTECTED AREAS, PROTECTED SPECIES, GREEN CORRIDORS AND OTHER SITES OF NATURE CONSERVATION.
2. WITH REGARDS TO POSSIBLE EFFECTS UPON THE NATURAL ENVIRONMENT, THE COUNCIL PROPOSE THAT THE PRINCIPLES OF THE MITIGATION HIERARCHY BE FOLLOWED. THIS GIVES SEQUENTIAL PREFERENCE TO THE FOLLOWING: 1) ENHANCE THE ENVIRONMENT 2) AVOID THE IMPACT 3) MINIMISE THE IMPACT 4) RESTORE THE DAMAGE 5) COMPENSATE FOR THE DAMAGE 6) OFFSET THE DAMAGE.
3. ALL DEVELOPMENT MUST PROTECT AND ENHANCE HERITAGE ASSETS AND THEIR SETTINGS.
4. ALL NEW DEVELOPMENT PROPOSALS WILL BE REQUIRED TO TAKE INTO ACCOUNT THE RISKS ARISING FROM FORMER COAL MINING AND, WHERE NECESSARY, INCORPORATE SUITABLE MITIGATION MEASURES TO ADDRESS THEM.
5. ACHIEVE EFFICIENT LAND USE AND THE REUSE AND REMEDIATION OF PREVIOUSLY DEVELOPED SITES WHERE POSSIBLE. PREVIOUSLY DEVELOPED SITES SHOULD ALWAYS BE USED INSTEAD OF GREENFIELD SITES WHERE POSSIBLE

INFRASTRUCTURE

1. NOT RESULT IN THE NET LOSS OF IMPORTANT OPEN SPACE, INCLUDING PUBLIC AND PRIVATE PLAYING FIELDS WITHOUT A ROBUST ASSESSMENT THAT THE SITES ARE SURPLUS TO NEED. IN ASSESSING THIS, REGARD MUST BE HAD TO THE LEVEL OF PROVISION AND STANDARD OF PUBLIC OPEN SPACE IN THE AREA, THE IMPORTANCE OF PLAYING FIELDS AND THE NEED TO PROTECT SCHOOL PLAYING FIELDS TO MEET FUTURE NEEDS. REGARD WILL ALSO BE HAD TO THE LANDSCAPE OR TOWNSCAPE OF AN AREA AND THE IMPORTANCE THE OPEN SPACE HAS ON THIS.

2. HAVE REGARD TO THE AVAILABILITY TO KEY INFRASTRUCTURE WITH CAPACITY. WHERE KEY INFRASTRUCTURE WITH CAPACITY IS NOT AVAILABLE IT MAY BE NECESSARY TO PHASE DEVELOPMENT TO ALLOW INFRASTRUCTURE ENHANCEMENTS TO TAKE PLACE.

3. CONSIDER THE POTENTIAL IMPACT ON SOCIAL INFRASTRUCTURE PROVISION.

OTHER

1. NOT PREJUDICE FUTURE DEVELOPMENT WHICH WOULD PROVIDE SIGNIFICANT ENVIRONMENTAL AND AMENITY IMPROVEMENTS.

This policy helps deliver the vision for the area and gives an overarching series of considerations that the Council will have regard to in achieving quality development.

POLICY DMH3: DWELLINGS IN THE OPEN COUNTRYSIDE AND AONB

10.20 WITHIN AREAS DEFINED AS OPEN COUNTRYSIDE OR AONB ON THE PROPOSALS MAP, RESIDENTIAL DEVELOPMENT WILL BE LIMITED TO:

1. DEVELOPMENT ESSENTIAL FOR THE PURPOSES OF AGRICULTURE OR RESIDENTIAL DEVELOPMENT WHICH MEETS AN IDENTIFIED LOCAL NEED. IN ASSESSING ANY PROPOSAL FOR AN AGRICULTURAL, FORESTRY OR OTHER ESSENTIAL WORKERS DWELLINGS A FUNCTIONAL AND FINANCIAL TEST WILL BE APPLIED.

2. THE APPROPRIATE CONVERSION OF BUILDINGS TO DWELLINGS PROVIDING THEY ARE SUITABLY LOCATED AND THEIR FORM AND GENERAL DESIGN ARE IN KEEPING WITH THEIR SURROUNDINGS. BUILDINGS MUST BE STRUCTURALLY SOUND AND CAPABLE OF CONVERSION WITHOUT THE NEED FOR COMPLETE OR SUBSTANTIAL RECONSTRUCTION.

3. THE REBUILDING OR REPLACEMENT OF EXISTING DWELLINGS SUBJECT TO THE FOLLOWING CRITERIA:

-THE RESIDENTIAL USE OF THE PROPERTY SHOULD NOT HAVE BEEN ABANDONED.

-THERE BEING NO ADVERSE IMPACT ON THE LANDSCAPE IN RELATION TO THE NEW DWELLING.

-THE NEED TO EXTEND AN EXISTING CURTILAGE.

THE CREATION OF A PERMANENT DWELLING BY THE REMOVAL OF ANY CONDITION THAT RESTRICTS THE OCCUPATION OF DWELLINGS TO TOURISM/VISITOR USE OR FOR HOLIDAY USE WILL BE REFUSED ON THE BASIS OF UNSUSTAINABILITY.

The protection of the open countryside and designated landscape areas from sporadic or visually harmful development is seen as a high priority by the Council and is necessary to deliver both sustainable patterns of development and the overarching core strategy vision.

POLICY DME3: SITE AND SPECIES PROTECTION AND CONSERVATION

10.14 DEVELOPMENT PROPOSALS THAT ARE LIKELY TO ADVERSELY AFFECT THE FOLLOWING WILL NOT BE GRANTED PLANNING PERMISSION. EXCEPTIONS WILL ONLY BE MADE

WHERE IT CAN CLEARLY BE DEMONSTRATED THAT THE BENEFITS OF A

DEVELOPMENT AT A SITE OUTWEIGH BOTH THE LOCAL AND THE WIDER

IMPACTS. PLANNING CONDITIONS OR AGREEMENTS WILL BE USED TO SECURE PROTECTION OR, IN THE CASE OF ANY EXCEPTIONAL DEVELOPMENT AS DEFINED ABOVE, TO MITIGATE ANY HARM, UNLESS ARRANGEMENTS CAN BE MADE THROUGH PLANNING CONDITIONS OR AGREEMENTS TO SECURE THEIR PROTECTION:

1. WILDLIFE SPECIES PROTECTED BY LAW
2. SSSI'S
3. PRIORITY HABITATS OR SPECIES IDENTIFIED IN THE LANCASHIRE BIODIVERSITY ACTION PLAN
4. LOCAL NATURE RESERVES
5. COUNTY BIOLOGICAL HERITAGE SITES
6. SPECIAL AREAS OF CONSERVATION (SACS)
7. SPECIAL PROTECTED AREAS (SPAS)
8. ANY ACKNOWLEDGED NATURE CONSERVATION VALUE OF SITES OR SPECIES.

DEVELOPERS ARE ENCOURAGED TO CONSIDER INCORPORATING MEASURES TO ENHANCE BIODIVERSITY WHERE APPROPRIATE THAT WILL COMPLEMENT PRIORITY HABITATS AND SPECIES IDENTIFIED IN THE LANCASHIRE BAP.

WITH REGARD TO SITES DESIGNATED UNDER EUROPEAN LEGISLATION THE AUTHORITY WILL FOLLOW THE RELEVANT PROCESSES AS DEFINED WITHIN THE HABITATS REGULATIONS 2010. DEVELOPMENT WILL NOT BE PERMITTED UNLESS EITHER IT IS ESTABLISHED THAT IT IS NOT LIKELY TO HAVE A SIGNIFICANT EFFECT ON ANY RAMSAR SITE OR NATURA 2000 SITE (INCLUDING SPECIAL PROTECTION AREAS, POTENTIAL SPECIAL PROTECTION AREAS, SPECIAL AREAS OF CONSERVATION, CANDIDATE SPECIAL AREAS OF CONSERVATION), EITHER ALONE OR IN COMBINATION WITH OTHER PROJECTS, OR IT IS ASCERTAINED, FOLLOWING APPROPRIATE ASSESSMENT, THAT IT WILL NOT ADVERSELY AFFECT THE INTEGRITY OF ANY RAMSAR SITE OR NATURA 2000 SITE. THE HABITATS REGULATIONS INCLUDE PROVISION FOR DEVELOPMENT WHICH MAY CAUSE AN ADVERSE EFFECT ON INTEGRITY TO BE ALLOWED UNDER EXCEPTIONAL CIRCUMSTANCES. THESE INCLUDE WHERE THERE ARE NO ALTERNATIVE SOLUTIONS, IMPERATIVE REASONS OF OVERRIDING PUBLIC INTEREST CAN BE DEMONSTRATED AND APPROPRIATE COMPENSATORY MEASURES ARE IMPLEMENTED. IN TERMS OF THE PROTECTION OF THE SOIL RESOURCE AND HIGH-QUALITY AGRICULTURAL LAND DEVELOPMENT AND LAND MANAGEMENT PRACTICES SHOULD SEEK TO AVOID SOIL EROSION; AVOID CONTAMINATION OF LAND AND PROMOTE RESTORATION, PROTECT THE PEAT RESOURCE AND RECOGNISE THE IMPORTANCE OF PEAT IN PARTICULAR FOR ITS CARBON SEQUESTRATION VALUE, WATER QUALITY IMPROVEMENTS FOR BOTH DRINKING WATER AND BIODIVERSITY, REDUCTION OF LOCAL FLOOD RISK AND REDUCTION OF MOORLAND WILDFIRE RISK. THE IMPORTANT LINK BETWEEN SOIL QUALITY, THE NATURAL ENVIRONMENT AND THE LANDSCAPE SHOULD BE RECOGNISED.

By proactively considering these important features through the development management process the Council will deliver the Core Strategy vision and support the delivery of sustainable development reflecting the development strategy and key statements.

POLICY DMB5: FOOTPATHS AND BRIDLEWAYS

10.27 THE BOROUGH COUNCIL WILL SEEK TO ENSURE THE RETENTION, MAINTENANCE AND IMPROVEMENT OF BY-WAYS AND UN-SURFACED/UNCLASSIFIED ROADS AS PART OF THE PUBLIC RIGHTS OF WAY NETWORK. IN SITUATIONS WHERE A PUBLIC RIGHT OF WAY WILL INEVITABLY BECOME LESS ATTRACTIVE (DUE TO ADJACENT/SURROUNDING DEVELOPMENT), THE POLICY SHOULD REQUIRE COMPENSATORY ENHANCEMENTS SUCH THAT THERE IS A NET IMPROVEMENT TO THE PUBLIC RIGHT OF WAY NETWORK. THE BOROUGH COUNCIL WILL, UNLESS SUITABLE MITIGATION MEASURES ARE MADE, PROTECT FROM THE DEVELOPMENT FOOTPATHS WHICH:

1. PROVIDE A LINK BETWEEN TOWNS/VILLAGES AND ATTRACTIVE OPEN LAND;
2. LINK WITH THE RIBBLE WAY FOOTPATH;
3. ARE ASSOCIATED TO THE LOCAL NATURE RESERVES; AND
4. ARE HEAVILY USED.

The Council considers the protection and enhancement of the footpath and bridleways network to be important given the character of the area and the contribution such networks can be made to leisure, health and tourism.

5.0 Issues for Consideration

5.1 In addition to the above procedural issues identified above, the following have been identified as being for consideration

5.2 Meeting the tests laid down by Paragraph 80- this will be addressed in more detail, once the pre-app response is received via a FOI. However, my initial assessment concludes that the proposal whilst it is well designed, is not truly outstanding. Indeed page 3 of the Design and Access statement submitted with the application states that the applicants want 'a country house' *"The clients' wish for a new country home in this area is based on the high-quality traditional architecture of these examples. The proposal will follow the scale, form and appearance of the local historic country houses, whilst incorporating innovative, modern technologies."*

5.3 There is then a map of some 25 country houses in the immediate vicinity of the Forest of Bowland. The problem is therefore that the current proposal is not 'exceptional' because there so many of these types of modern 'country homes' in the Borough, indeed in this one part of the Borough, many of which are little more than a pastiche of the original architecture of the day.

5.4 Whilst every application has to be determined on its individual merits I am of the same opinion as the Inspector in the attached case (APP/K1128/W/20/3253743) where he states in paragraph 15 of the decision letter: "However, I struggle to see how it would be so remarkable or excellent as to reach the very high bar of being a truly outstanding design. I concur with the remarks made by the LPAs officers that similar designed buildings and materials have been used in contemporary schemes elsewhere and the proposal would not be unusual in terms of architectural aesthetics." That applies here, yes, the applicants have made a case that the property will be carbon neutral and made a significant statement around the sustainability credentials of the proposed development, but that is somewhat limiting.

- 5.5 In that respect I consider that there are parallels given the number of identified similar examples which the application submission itself identifies. The fact that the proposal has the support of the TAG group is not significant. That group is focused on traditional architectural proposals, not modern/contemporary schemes, therefore it is only really looking at the scheme in a limited and specific way. The weight to be given to their conclusions is therefore limited because their brief and background is limited.
- 5.6 Indeed it could be argued that by limiting their choice to a country house, the applicants have significantly undermined their argument that the scheme is of exceptional design qualities. Their starting point of wanting a country house, prevents the opportunity to look at alternative exceptional designs which may have met the strict tests of paragraph 80 of the NPPF.
- 5.7 In addition there are also other parallels to be drawn from that case with this submission – regarding the extensive driveways (two of them) and the trappings of domesticity which will be associated with a development of this size
- 5.8 In objecting to this scheme an independent landscape assessment has been done, which identifies that the planting proposed, which is substantive, is likely to have a minor adverse effect on the setting and not significantly enhance the setting. The wording of Para 80 here is crucial to the consideration of this application, and if the proposal and its associated landscaping fails to significantly enhance the setting then the application is not policy compliant. I will not re-hash what the landscape consultant says, other than to re-emphasise that the report concludes that the proposal is not policy compliant on that basis.
- 5.9 Meeting the test to conserve and enhance the AONB, is indeed another even higher benchmark than a normal countryside setting again to be discussed in more detail both by myself and an independent landscape consultant
- 5.10 Residential Amenity – to be discussed further, in relation to the use of the secondary access and the relationship of that proposed access to residential properties on Hodder Lane.
- 5.11 Loss of views from and effecting the setting of PROWS – to be discussed further, but essentially not only the large and dominant dwelling and associated outbuildings but also the proposed planting, much of it of species that is not native to the AONB, will have a substantial detrimental effect on the users of the PROW's and the setting in which they currently find themselves enjoying
- 5.12 Flood Risk/Drainage – to be addressed further on receipt of the required information as identified in the procedural section of this submission
- 5.13 Biodiversity – We have significant concerns regarding the submitted ecology statement. Our concerns range from, the methodology that the biodiversity Metric calculation is submitted in, which is in a format that differs from the standard Natural England format in appearance, but also in anticipated content. There is not a map of the baseline or post proposed development habitat types to be able to determine whether the proposed mitigation is sufficient and Net gain achieved. This is significant given the sites ecological importance in the AONB and given the requirements of paragraph 80 of the NPPF.
- 5.14 In addition as already mentioned there is no detail provided on how the habitats will be managed for the 30-year period required under the legislation relating to biodiversity Net gain.

5.15 On a point of detail, the statement in the ecological appraisal 6.10.4- that the streams are unlikely to support fish is incorrect. Eels and other fish species have been identified in the streams present on site. Otters have been sited within the immediate locale of the proposed development, and the ecological appraisal caveat around when the survey was undertaken and preceding weather conditions are important, as we would expect significant evidence of otter presence to be found in normal conditions.

5.16 Our concern is so significant about the robustness of the report that the Lancaster's' have committed to appointing their own independent ecologists to review the report and carry out their own findings which will be submitted in due course.

6.0 Conclusion

6.1 At this stage we have considerable concerns around the fact that the application lacks detail in a few important areas. Given the sites location in an AONB, this lack of this information should preclude any decision making until these matters have been properly addressed, and they cannot be addressed until that missing information is submitted to the Council and consulted upon accordingly.

6.2 As such on behalf of [REDACTED] I contend that further representations can and will be made on viewing of that missing information., as well as addressing some of our concerns on the existing information.



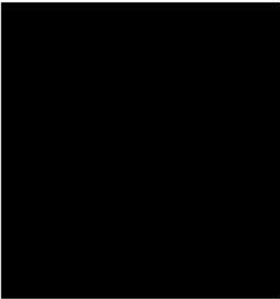
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Chartered Town Planner



Planning Application No: 3/2021/1008





PLANNING	
30 NOV 2021	
FOR THE ATTENTION OF	

26th November 2021

Planning Application No: 3/2021/1008

Grid reference: 369933 441046

Proposal: Proposed new house of exceptional quality (NPPF paragraph 80e) of Passivhaus Plus and Zero Energy design with associated landscaping and biodiversity enhancements.

Dear Sir/ Madam,

We are writing to register our objection to the proposed development of Hodder Grange.

We were shocked to receive the letter outlining the significant proposed development [redacted] Understanding that this has been at least 2 years in the planning, [redacted] Being given such a short time to absorb the magnitude of the proposed development and the impact on life as we know it. [redacted] build on arguably one of the most beautiful fields in the Ribble Valley. It is a jewel in its crown. [redacted]

The field is set within an area of outstanding natural beauty, it is a haven for wildlife and is the backdrop to a favourite river walk for countless people. The pandemic and subsequent enforced lockdowns showed more than ever how priceless these natural wildernesses are for everyone's mental health. We cannot tell you the amount of people who stop us on a regular basis as we walk along the river and remark how lucky we all are to have such places of beauty on our doorstep. As Clitheroe continues to be overwhelmed with housing developments, these areas of Outstanding Natural Beauty surrounding our special town are peace havens and should be protected more than ever.

Although superficially the watercolour pictures and positive language surrounding the design for this proposed manor house may seem impressive, we have felt compelled to seek several experts' opinions to understand the implications of such a build on the landscape, wildlife and wider community. We have included their opinions and reports to be read as part of this letter.

Our main points of objection and concern are:

* We feel the proposed watercolour drawings are misleading in how they portray the property nestled into the field. We feel the actual size of it would be more imposing and we would like to pursue CGI imagery to allay our doubts. We feel the scale and height of the property will have a dominating visual impact on the landscape, particularly for those walking the footpath on the other side of the river.

*We do feel it is morally wrong that this field, with no existing buildings and marked as agricultural land in an AONB, could be allowed to be changed to domesticity, especially one of this size and significance.



and it is popular with dog walkers, so any increase in traffic would be hugely disruptive and dangerous for such a narrow track.

We are very concerned that the proposed secondary road looks as if it would be a busy back entrance for stable traffic and that workmen and tradesmen would be directed onto a lane that could not support such an increase in traffic volume.

*Proposed planting of evergreen trees blocking sweeping views to the river. The trees specified on the proposal are not indigenous to the area. The beauty of where we live is in the various and changing colours of the trees on the hillside opposite and along the river edge. By planting evergreens, the landscape will change unrecognisably. We feel the choice of trees is purely to create privacy and not to enhance the beauty of the natural environment.

*Impact on local wildlife environment. have had many magical moments encountering the wildlife that surrounds us. In May we had an otter visit at 7.30 am, one morning (see photos attached) The otter would have made his way up to us through the field due to be developed.

A local conservationist has also advised us that a semi improved field could potentially be used by foraging Noctule bats, as many bats live in the area. So, we feel environment impact should be seriously considered on such a sensitive site so rich in wildlife.

The timid kingfishers are appearing more often along the river and if spotted always create much excitement. We do also have a resident barn owl affectionately named "Barney" by our children, in the area but we are unsure where he sleeps, we have huge concern that these animals and birds who have been here for many years would undoubtedly move on with such huge disruption.

Again, it should be noted, that otters were not noted during the ecology report; our photos prove otherwise.

*Historical significance.

We were delighted to see the River Hodder featured as a prized AONB, on the BBC's Best River Walks earlier in the year. It journeyed through some of the region's most glorious scenery including the Tolkien trail which the public footpath opposite the proposed Hodder Grange leads to. It was fascinating to hear the curator of Stonyhurst college enthusiastically distinguishing the facts between the fiction surrounding 'Cromwell's Bridge' and the Lord of the Ring's connections to the area. Very interestingly explained that the

Higher Hodder bridge (where Hodder Grange will be accessed) was much more likely to be the bridge where Oliver Cromwell took his army across the River Hodder in 1648 on his way to Stonyhurst College, where he famously stayed the night in the Hall. The old 'Cromwell bridge' named after Oliver Cromwell would not have been wide enough to carry the horses and soldiers across. It is very likely that this tranquil stretch of water holds many other historical secrets, and we feel its natural beauty should be retained for that alone.

*The proposed land use change could pose an increase in downstream flood risk, which again is not possible to determine from the information provided.

*We have been advised that the biodiversity Metric calculation is submitted in a format that differs from the standard Natural England format in appearance, but also in anticipated content. There is not a map of the baseline or post-proposed development habitat types to be able to determine whether the proposed mitigation is sufficient and Net Gain achieved.

* There is no detail provided on how the habitats will be managed for the 30-year period required under the legislation relating to biodiversity Net Gain.

* The statement in the ecological appraisal 6.10.4 - that the streams are unlikely to support fish is incorrect. Eels and other fish species have been identified in the streams present on site. Otters have been sighted within the immediate locale of the proposed development, and the ecological appraisal caveat around when the survey was undertaken and preceding weather conditions are important, as we would expect significant evidence of otter presence to be found in normal conditions.

*The applicants possible use of helicopters in their new proposed development is also concerning to us, we believe the construction work will be detrimental to the wildlife on the river, but after construction the light pollution and sound pollution from a development of this size will be catastrophic. The change in use of the field from agriculture to domestic would also mean the owners have limitless permission for landings anywhere in the field. (Usually, helicopters are limited to a certain number of landings per year outside of their curtilage.)

* Walkers currently park in the layby by the bridge: there are concerns that the new development might curtail the layby in order to give better access to the estate. Residents already struggle for parking at Hodder Bridge Court and there is concern that parking problems will increase, especially with potential construction traffic and labourers in the coming years also needing to park.

*The proximity of the main drive to the river, not only will have detrimental impact on the wildlife but perhaps most significantly be at great risk of flooding. At no point could the lane to the front of our property support the traffic from a house of this size.

* We are acutely aware that the planning application is reminiscent of the Sawley build. We have been talking to many residents of Sawley, who have said many promises were made pre-planning consent and once permission was granted, sadly these promises were not met. Most consider its presence to be anything but an enhancement to the surrounding area.

We have been advised by [REDACTED] acknowledged as the UK's leading authority on the geology of Bowland, who has made the following comments about the proposal.

He said that "the ecology report should have been assessed in the four seasons and not just in the winter. With the river in full flow many species of flowering plant that can only be seen easily in spring and summer, such as orchids, may have been missed at the time of the survey. When the river is at normal heights, or below, shingle banks and pools provide feeding sites for wagtails and plovers. Rocks exposed in mid-stream provide perches and feeding sites for dippers and kingfishers. When in leaf, overhanging trees not only shed insects for fish to feed on but even in winter, their exposed roots and branches provide perches for kingfishers to feed from. Curlews occur in this area and are likely to visit. Fish eating ducks such as goosander breed and feed on the river during spring and summer. There is no mention in the report of the migratory fish that come up and down the river and in some cases enter tributaries and watercourses. Salmon, sea trout, lampreys and common eel (now endangered) are amongst these. Other fish that require good water oxygenation, such as stone loaches also occur."

Flood risk. "A monitoring station for recording river levels nearby to the site is at Hodder Place. The website can be found here. <https://riverlevels.uk/hodder-great-mitton-hodder-place#.YZ-7VcfP02w>. It records the highest level ever recorded as: **The highest level ever recorded** at the River Hodder at Hodder Place is 2.86m, reached on Thursday 23rd October 1980 at 12:45pm. It is important to realise that the monitoring station has only been operational since the 1970's. The River Hodder catchment drains a wide area of moorland & steep sided valleys which can result in producing flash flooding during extreme rainfall events. Whereas Stocks Reservoir can act as an upstream buffer to some of these events, it needs to be borne in mind that the reservoir has nearly been overtopped in the past (August 8th 1967- Reference: HYDRAULICS RESEARCH STATION. *Forest of Bowland and Pendle Floods of August 1967*. HRS Report Ex. 382, HRS Wallingford, 1968). With the increased risk of extreme rainfall events, due to climate change, it cannot be ruled out that extreme flood events could impact on the proposed site within the expected lifetime of the building."

"In addition, there is a possible phosphate and nitrate leakage risk into the adjacent watercourses and River Hodder. It is important that the proposed package treatment plant does not add to the phosphate and nitrate burden of adjacent water courses and river, either by direct leakage, or through the subsurface."

Most significantly [REDACTED] found the ecological report lacking in many regards.

We sought the advice of another river expert, and they too were concerned building a house of this size on a flood plain. [REDACTED] who is a keen fisherman told us that he has known the river to flood on this field 3 times in the last 50 years. He said each were one offs, but his advice for the way the climate is changing is to expect more of these one-off floods. With wetter winters and dryer summers floods are changing and becoming more serious. He too remembered the flood on 8th August 1967 where Stocks reservoir nearly broke, he spoke about that day with grave caution. It would have been a devastating blow for everything down river.

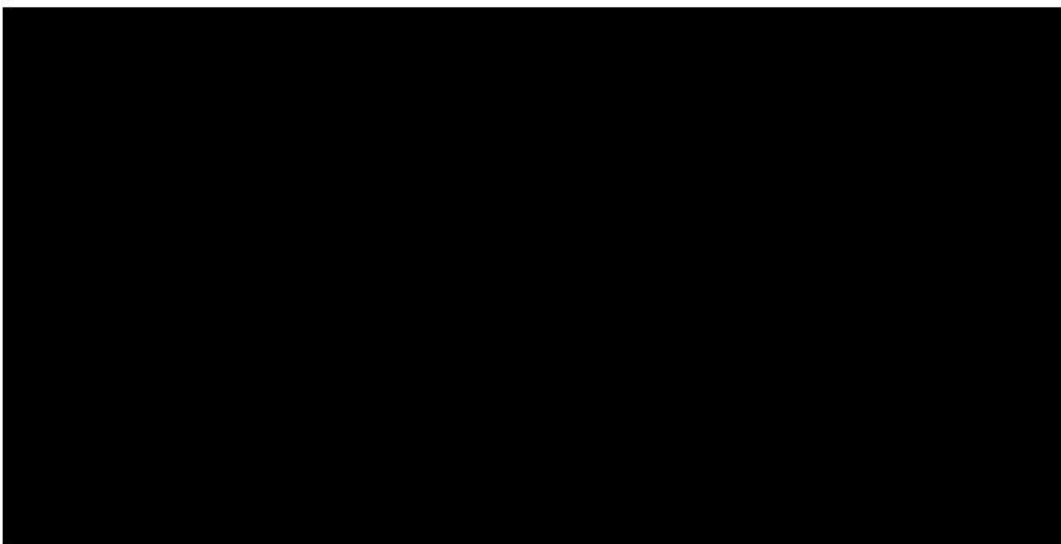
He said the river needed more room and although the floods may not have come as high as the proposed build before now, the climate crisis means the past could not be a guide to the future.

We are obviously deeply appreciative of the natural beauty of the place where we live but we are also ultimately concerned for the precedent it sets if this application is granted. Development can never be reverted and we in the Ribble Valley are at a tipping point of spoiling one of the most beautiful areas in the country.

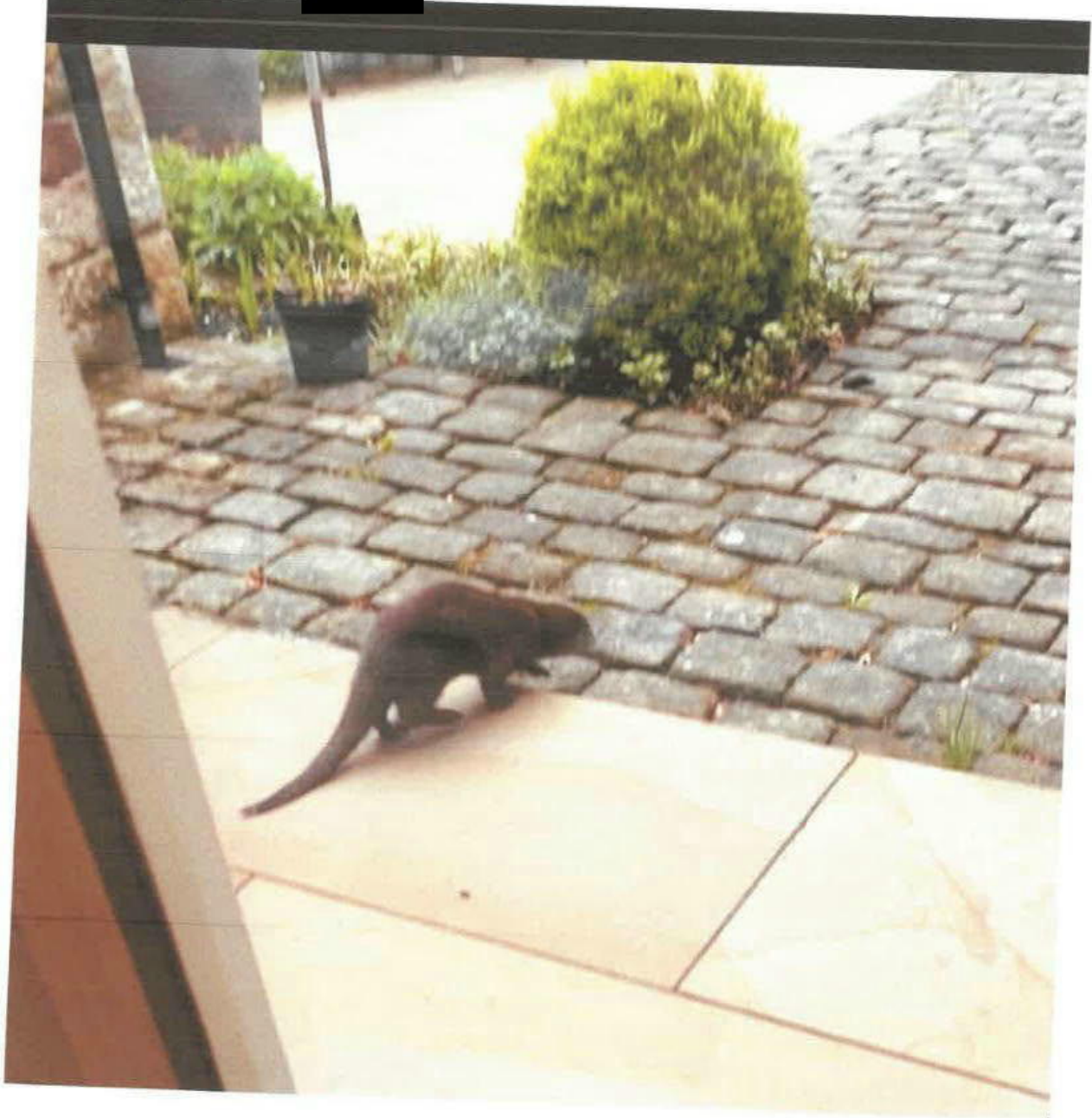
In truth some green fields across the country may be significantly enhanced by a project of this magnitude, but this field in an AONB, is already breathtakingly stunning and steeped in history (and legend) we believe any change in use would detract from the beauty of this natural paradise.

We care passionately about our local environment and everyone we have spoken to agrees that the area does not need this development. All have been shocked and there is a feeling of despair, even by those not intending to object.

Yours Sincerely

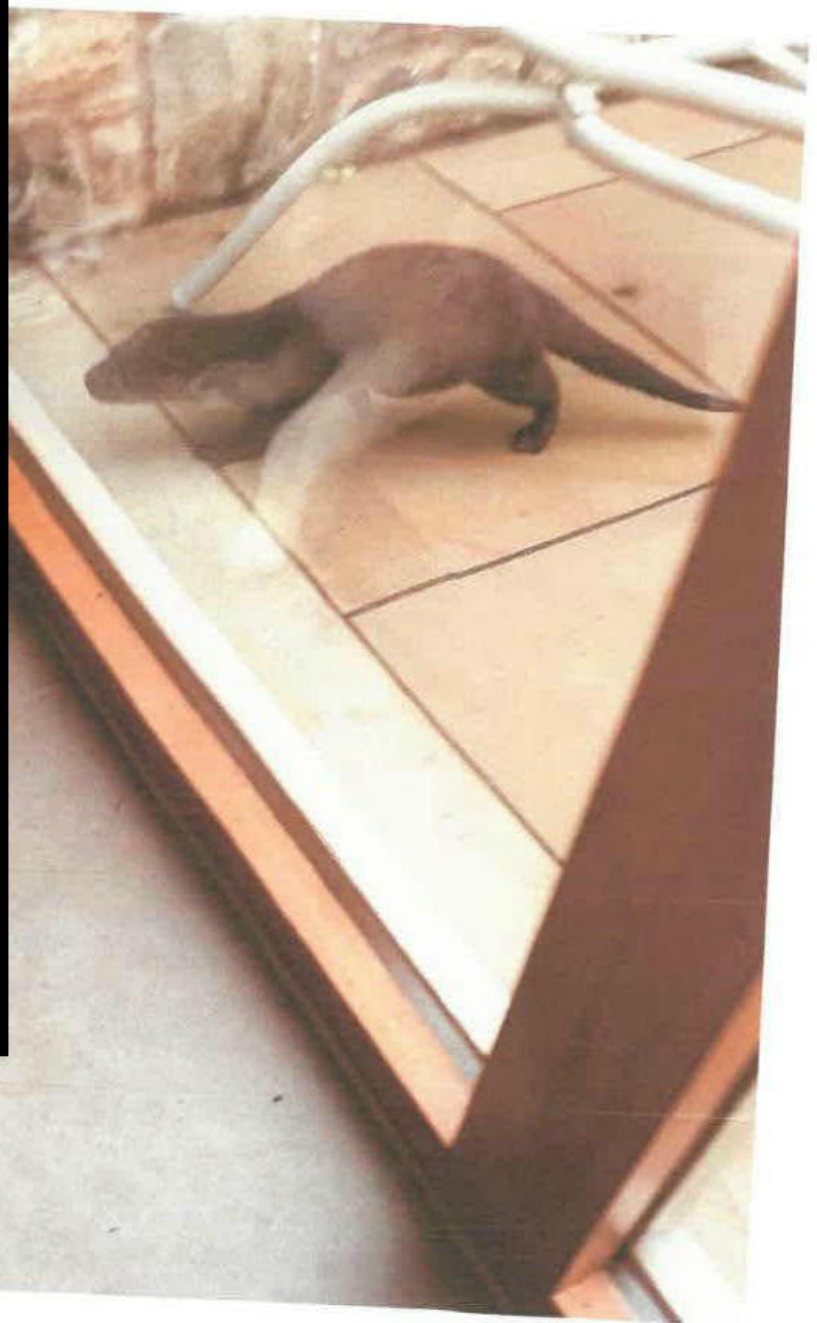


25th May 2021



part of the letter of objection to planning application
No: 3/2021/1008

25th May 2021



part of the letter of objection to planning Application
No: 3/2021/1008

[REDACTED]
25th May 2021 7:30am



[REDACTED]
part of the letter of objection to planning application
No: 3/2021/1008



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



November 26th 2021

To Whom it May Concern

Planning Application 3/2021/1008 – New House at Higher Hodder Bridge

I saw details of this planning application recently and have carefully reviewed the plans.

Having done so, I would like to confirm that I am fully in support of the application. There is so much to commend about the proposals, and I think that they will make a fantastic addition to the area.

There is little doubt from the documents that the designs for the house have been carefully prepared over a long period and are respectful to the area. Many new developments have little regard in design terms for where they are sited, and it is refreshing to see plans that are right for this area.

The house is not a large one in comparison to many country houses in the Ribble Valley and Forest of Bowland and would seem to fit comfortably with all of the new tree planting that is proposed.

It is very impressive to see a traditional design which incorporates passivhaus design and 'zero energy' and hopefully this can encourage others who are building new homes to follow suit, especially given the climate change crisis.

I see no reason at all why the plans should not be passed and will be very interested to follow progress on this 'exceptional quality' application.

Yours sincerely,

