



19 August 2022

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

BY EMAIL:
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Dear Kathryn

RE: Planning Application 3/2022/0705, Land on West Side of Eaves Hall Lane, opposite entrance to Three Rivers Caravan Park, Eaves Hall Lane, West Bradford BB7 3JG

I write in my capacity as Clerk to West Bradford Parish Council. As a statutory consultee, the Parish Council always seeks to balance the need for any development (especially in a commercial context) against the residential amenity of the village. The above application has been considered by members of the Parish Council in advance of their next meeting (to be held on 31 August 2022), and as a result I have been asked to submit the following observations.

The Parish Council remains very aware that the proposed location for the development is situated within the Forest of Bowland AONB, as well as in close proximity to the Grade II listed Eaves Hall. As such, members are keen to ensure that any application which may ultimately lead to increased commercial activity is subject to appropriate scrutiny.

The Parish Council accepts that a large caravan site (Three Rivers Country Park) is already in existence a short distance to the east of the proposed site, and there is therefore some precedent for such land use in the area. However, the Parish Council notes that the Planning Statement does not make any reference to the economic justification for an additional site being established. In members' view, the creation of a second site in such close proximity to the first is unnecessary, undesirable and would represent a further erosion of the AONB.

In addition, the sewerage system for the village of West Bradford is already known to be at capacity, with residents previously given assurances that no significant residential expansion would take place without this being addressed. Section 10.1 of the planning statement merely states:

“A foul drainage connection will be requisitioned along Moor Lane to the existing mains drain in Moor Lane, which is about 150 metres to the south”

The planning statement does not otherwise address how any additional sewerage capacity demands arising from the proposed development will be managed.

Notwithstanding the above, members' main concern relates to the impact on traffic flow /road safety which this development would bring. Section 6.2 of the Planning Statement states:

“Moor Lane is a good standard of country road with several access along it to serve houses and business sites. Given the small number of holiday lodges proposed, the traffic generated will be minimal. It is not envisaged therefore that the amount of traffic generated from the proposals will create traffic problems on the surrounding highway network.”

With respect, the Parish Council profoundly disagrees with this assertion. The 12 new lodges (with a minimum of 1 car per lodge) will generate significant additional traffic flow, not only during the hand-over period for holidaymakers but – given the isolated location of the site and the lack of public transport – at other times as well. The proposed entrance to the site will be located to the north of the entrance to Three Rivers Country Park (which in itself can be challenging for vehicles entering / exiting the site). The stretch of road between the Three Rivers entrance and the proposed new entrance to the lodge area is very narrow (c3m wide), with no passing places and incorporating a slight bend in the road which hinders visibility. If approved, the new entrance will only exacerbate what is already a problematic situation.

In recent years the Parish Council has been consistent in opposing development on Eaves Hall Lane for reasons of road safety / traffic flow. Furthermore, members have expressed their concerns about a number of other pending applications in the vicinity which – if approved – will only add to the congestion.

It is pertinent that the Parish Council continues to receive regular complaints from pedestrians about traffic issues arising from increased commercial activity on Eaves Hall Lane / Moor Lane / Dove Syke. These concerns for road safety caused the Parish Council to approach Lancashire County Council (as Highways Authority) by email on 12 October 2020. An extract from this email is set out below:

“Over the summer, members of the Parish Council had considered planning application 3/2020/0544 (construction of 15 eco lodges and infrastructure to provide additional accommodation for Eaves Hall, Eaves Hall, Eaves Hall Lane, West Bradford). It was agreed that a consultation response relating specifically to the merits of this particular application would be submitted, although no reference would be made in that response to wider highways concerns as it seemed unfair to focus these solely on the applicant in this case. Instead, it was felt better to make a later approach to the Highways Authority in which these wider concerns were outlined; hence this email.

Members had noted that, as well as application 3/2020/0544, other applications with a potential impact on traffic flow have recently been approved. These include 3/2019/0845 (dog day care at Eaves Hall Farm). It is also believed that other development is likely to exacerbate the traffic situation on Eaves Hall Lane, eg further expansion of the Three Rivers Country Park site and the establishment of a children's nursery at Dove Syke, the latter having led to complaints from residents about increased traffic volume and speeding in the vicinity.”

Whilst the County Council subsequently declined to introduce any general traffic calming measures on Eaves Hall Lane, this response has done nothing to reduce Parish Council members' concerns at the cumulative effect of additional planning applications in the Moor Lane / Dove Syke area. For

instance, the Parish Council is aware that the LPA has already acknowledged the presence of traffic concerns on Moor Lane in planning consent 3/2019/0845, through the imposition of the following restriction on a dog care facility located at the upper end of Eaves Hall Lane:

“All dogs using the day care services shall arrive by vehicles associated with the business on a pick-up basis. For the avoidance of doubt no dogs shall be accepted from customers whose dogs arrive by private motor-vehicle whether on a customer drop-off or appointment basis.”

In summary, the Parish Council would ask the LPA to seriously consider the appropriateness of approving application 3/2022/0705, given the site’s anticipated negative impact on the AONB, sewerage capacity being exceeded and the likely road traffic implications.

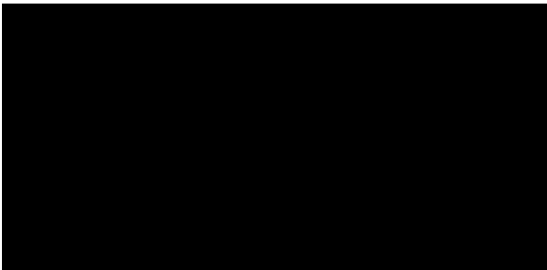
If – despite the above reservations – the LPA should choose to grant the application, the Parish Council would ask for the following matter to be addressed via a condition. The Management Plan which accompanies the application states that:

“The site is a new holiday site that will be for permanently sited, all year round holiday use.”

If approved, the Parish Council would wish to see a condition imposed which prohibits any residential occupation and restricts the lodges to holiday use only. There is already residential occupation on a number of lodges on the Three Rivers site and – for the reasons cited above - the Parish Council would not support any further such expansion.

I note that the last date for submission of comments is 26 August 2022. I would be grateful if the above comments could be considered when Planning Application 3/2022/0705 is determined.

Yours sincerely



Clerk