

**From:** Contact Centre (CRM) <contact@ribblevalley.gov.uk>  
**Sent:** 23 January 2024 10:37  
**To:** Planning  
**Subject:** Planning Application Comments - 3/2023/0706 FS-Case-579741889

**Planning Application Reference No.:** 3/2023/0706

**Address of Development:** Higher College Farm  
Dilworth Road  
Hothersall  
PR3 2YY

**Comments:** Hothersall Parish Council wishes to raise serious concerns about Application 3/2023/0706 which seeks to override Application 3/2022/0553 - approved by Ribble Valley Borough Council just one year ago.

The key to the developer's new application can be found on page 25 of the Planning statement. Paragraph 7.26 makes it clear that it is a desire to substitute a cheaper alternative than the one already approved that is behind this application.

A shrunken portion of the site is now to have higher density, cheaper, uniform windowless units in place of the approved proposal.

1. 3/2022/0553 contained a similar number of units to the current proposal. That is where the similarity begins and ends. The claim in paragraph 6.2 of the Planning Statement that the current application is 'broadly the same as the approved scheme' is fanciful.
2. 3/2022/0553 accommodated 40 units, of varying sizes, over an area of 5265 square metres – the current proposal will provide 40 units over an area of little more than half that size, 2788 square metres, greatly increasing the density.
3. In the proposal already approved, the units varied in size and outlook to accommodate a wide range of uses within Class E. Given that the site has been designated for employment and is a speculative development, it made sense to have a variety of premises available to businesses and this is codified in Policy EAL3.
4. However, the Planning Statement, paragraph 5.19, while referring to the need for flexibility, contradicts itself at paragraph 7.22 where it justifies the uniformity of the units with a claim 'that each unit is to be utilised for the same purpose'.
5. Paragraph 7.11 notes that, given the site's location in the countryside (it lies within Hothersall rather than Longridge itself), development proposals are required to be 'essential to the local economy'. Hothersall Parish Council acknowledges that the land is zoned for employment but can find no evidence that a business needs survey has been carried out by the applicant to identify what facilities are needed to meet the criterium of being 'essential to the local economy'. While understanding the principle of business confidentiality, the Parish Council has been given assurances of need in the past which turned out to be fictitious. We are therefore sceptical of the need for 40 units 'to be utilised for the same purpose'.
6. Rather than the courtyard surrounded by well-designed buildings in a variety of sizes using a blend of contemporary and traditional building materials, we now have four large sheds each subdivided into 10 identical units with roller shutters in place of glazing and the only natural light coming from roof glazing.
7. The four sheds, it is claimed at paragraph 4.7 will 'blend seamlessly into the surroundings'. As most of the

surrounding farm buildings are made of local stone, it's difficult to understand how the units described in paragraph 4.6 could possibly 'blend seamlessly'.

8. Paragraph 7.25 claims that the design has been influenced by 'nearby developments' and illustrates this with Mitton Road Business Park. In fact, much closer to this site is Manor Court in Ribchester – this is a much more appropriate comparison and very different from Mitton Road.

9. Despite the current proposal claiming, as did its forerunner, that it will provide 60 FTE jobs, parking has been reduced by a third, from 151 spaces to 101 spaces. No rationale is offered for this discrepancy. The size of the site is an irrelevant consideration if the number of proposed users remains the same (paragraph 4.2 of the Transport Statement). The danger is that cars will park on the grass verge on the main road and around the sheds creating hazards for road users and blockages for commercial vehicles and refuse lorries.

10. While all efforts to discourage single driver vehicles are to be encouraged, the claim in paragraph 6.8 that the site 'has good public transport links' must be challenged. There is only one service an hour between Chipping and Clitheroe and one an hour between Blackburn and Preston. The nearest bus stop for frequent services to Preston is a one mile walk from the site. It is reasonable to assume that many site users, visitors or employees, will use private transport.

11. Nevertheless, we support the use of public transport and insist that safe pedestrian access is provided to the public transport nodes. For those who do use the bus services, this current proposal offers no pathway to the nearest westbound bus stop (a distance of 240m). The only provision for pavement is around the bellmouth access to the site.

12. The Travel Plan acknowledges the need to promote walking and cycling. In paragraph 6.5 of this document it uses the example of providing facilities for storage, changing and showering for cyclists. However, nowhere on the plan do we find changing rooms and showers for cyclists.

13. Reference is made in the Travel Plan, at paragraph 2.13, to Lower Road being part of Ribble Valley's Northern Loop for cyclists. Adding an extra access road for commercial and private vehicles on to Lower Road and placing a pedestrian refuge (necessary as it is) on the road increases the potential hazards for cyclists on this stretch of Lower Road. Nowhere in the application is there any mitigating proposal.

14. Paragraph 7.6 reads 'If the results of annual monitoring show the targets of the Travel Plan are not being met consideration will be given to providing additional funding to incentivise sustainable travel'. 'consideration will be given' is no assurance that action will be taken.

15. Contrary to the claim in paragraph 6.12 that 'the proposal will not have a severe impact on the operation of the local road network', many residents have long had concerns about safety on Lower Road. Hothersall Parish Council has been working to extend the 30mph zone from Lower Road to Ribchester Road. The proposed road from the site meets Lower Road directly opposite the existing bus stop, within metres of a change from 30mph to 60mph, and close to a 90degree bend at the junction by the Corporation Arms, a junction acknowledged as hazardous by LCC Highways and, in previous applications, subject to modification by this site's developers. Morning and mid-afternoon, taxis for Hillside Special School park on Lower Road creating an extra hazard for traffic entering or exiting the site. It's essential that the increased traffic generated by any development on this site be taken into consideration and mitigating measures introduced prior to any construction work beginning.

16. Please refer to Attachment 1 – a drawing illustrating the area around the proposed access road and showing bus stops and the 30mph speed restriction which only applies west of the sign. To the east of the 30 sign, the national speed limit is in operation.

17. Paragraph 7.5 refers to a battery storage facility for PV 'for a portion of the energy for the proposed units'. No PV panels are shown on the drawings. Has this been thought through?

18. A similar vagueness is evident in paragraph 7.21 with the reference to 'development will likely include a decent amount of planting and landscaping'. 'likely include' and 'decent amount' are so vague as to be worthless as assurances.

19. We note that the existing mature hedge bordering the site on Lower Road will need to be reduced to 1m in height to improve visibility for traffic leaving the site. What plans have been made to make good this deficit? Again, there is no evidence that the loss of nesting sites and the carbon capture capacity of hedging has been taken into account.

20. We note that Lancashire County Council as the Lead Local Flood Authority has objected to the current proposal because of inadequate information from the applicant.

21. We too have concerns. Although designated in a area of lower risk, as local residents we know that Lower Road has been subjected to flooding. With heavier and more frequent extreme weather events as the Met Office has warned, it's probable that there will be flash floods on Lower Road.

22. Of potentially greater concern is the impact of this hard landscaping and building on land south of the proposed

development. Land slopes away towards the River Ribble and, on the heavy clay pan, flooding affects farmland and dwellings between this site and the river. The Met Office timeseries of annual UK rainfall (source:HadUK-Grid 01/01/2024) shows a consistently upward trend from the 1970s onwards. This is likely to be aggravated by more frequent and extreme storms.

23. There appears to be little consideration of the ways to tackle drainage from this site so that it does not have a negative impact on neighbouring property. Indeed, the Flood and Drainage Strategy document while acknowledging that the 'ground conditions (hard brown clay) mean that infiltration is unlikely to provide a viable drainage solution for surface water run-off' – paragraph 4.7 - offers no solution other than letting surface water run-off into fields beyond the site. And as all land south of the site slopes down towards the river it is inevitable that the development will create problems for properties between the site and the river. Until detailed proposals have been presented to mitigate the risks (e.g. rainwater storage on site with the potential to be used for flushing toilets and irrigation), the Parish Council cannot support the application.

24. When planning permission was granted for the new building at the adjacent Hillside School, a green roof was stipulated in order to slow the flow of water to avoid flash flooding. Why is something similar not proposed here?

25. We note that sewage is to be routed into the main sewers north of the site and that this will require a pumping station to the south of the site. We do not see this identified on the plans. Is it to be incorporated into the maintenance building or is it an additional structure?

26. We note that it has been practice, in some cases, for an applicant to submit a proposal for development and, only if that is successful, continue to purchase the site with an intention to re-negotiate the Planning Approval after purchase. We note that the property was sold to the applicant four months after Planning Approval was granted and that Ribble Valley Properties was incorporated a month after that. The current proposal – drafted by Evolve, an out of Borough practice rather than SPA, the Ribble Valley based practice which drafted the successful application – was submitted five months later. That may explain why the current application is so very different from the previous successful application which had the broad support of the Parish Council

In summary, Hothersall Parish Council – the Parish in which the land is sited - opposes this application, finding little of merit in it.

The current application is driven by a cost-cutting mindset, incoherent and contradictory about the businesses that might use the premises, ill thought through on its flooding and drainage strategy, inadequate on the Transport Statement and Travel Plan, casual in its attention to environmental concerns and out of sympathy with the vernacular architecture of surrounding buildings.

