



21st March 2021

Planning Application: 3/2020/1037

Ref: Proposed single storey building to be used as a holiday lodge and creation of new vehicular access off Malt Kiln Brow.

Dear Adam,

Thank you for allowing us the opportunity to submit our thoughts / concerns to the Ribble Valley Borough Council in regards to planning application 3/2020/1037.

Please find below a list of our concerns which we hope you will take into consideration when making a decision about this application.

Impact on heritage assets and their setting:

We think the proposed modern single storey building on the land to the rear of Grove Square would be harmful to the character and appearance of the Kirk Mill Conservation Area and the setting of Kirk Mill (and its mill pond), Grove House and Kirk House listed buildings which lie within a designated Area of Outstanding Natural Beauty (AONB).

The Kirk Mill Conservation Area was formed by the RVBC to provide protection to and preserve the C18 industrial hamlet – which is made up of a small number of distinctive and significant buildings (three of which are Grade II listed). The closely grouped industrial buildings which are nestled below the ridge line of the natural bowl are constructed from decoratively faced local stone with slate roofs.

Kirk Mill Conservation Area was designated on 4 February 2010 as a ‘surprisingly intact example of a C18 Arkwright Mill industrial hamlet’. Please visit the link below (Specifically para 4.2 & 4.3) for the reasoned argument for the designation by the RVBC Conservation Officer:

https://www.ribblevalley.gov.uk/download/meetings/id/2326/proposed_conservation_area_at_kirk_mill

The prominent and steep agricultural backdrop to Kirk Mill, Grove Square and Grove House is an important contributor to the natural bowl in which the conservation area lies, which was identified as an important characteristic in the conservation area extension of 7th April 2011.

The proposed holiday lodge siting lies within the Kirk Mill Conservation Area and we think the proposed modern materials (timber clad façade and highly reflective and conspicuous expanse of full height glazing) to the front of the proposed split-portioned holiday lodge would be unduly prominent and incongruous. Its proposed position, sat on the very top of the natural bowl, overlooking Grove Square and the Mill Pond, would detract from the historic value which the existing Grade II Listed buildings bring to the Kirk Mill Conservation Area.

Distinctiveness:

The buildings in the Kirk Mill Conservation Area have a close visual and historic relationship, all built in the C18 and early C19. These buildings are full of character and distinctive in their construction. The proposed modern timber clad building with full height glazing would be a stark contrast to the charming industrial heritage buildings closely nestled within the industrial hamlet, and would not positively contribute to local distinctiveness.

Visibility:

The proposed siting of the holiday lodge on the very top of the bowl behind Grove Square, where it would sit at the roof line of Grove Square and extend 5 metres upwards, would only be partially screened by natural foliage. Views across the conservation area change according to the time of year, during the winter months the proposed building would be visible from various points along Malt Kiln Brow & Church Raikie: – please see below:

Church Raikie (N):



Malt Kiln Brow (NE):



Malt Kiln Brow (SW):

The plan also states: "...however because there is a well-established tree and hedgerow at the bottom of the site as well as a retaining wall, the structure will not be visually prominent from below" (roadside)

However a good portion of this 'screening' hedgerow would have to be removed to make allowance for the proposed parking space – thus making the proposed parking area and holiday lodge siting most prominent!



We think the proposed siting and modern building materials will have a negative impact on the Kirk Mill Conservation Area and the heritage assets (Grade II listed Kirk Mill, Grove House and Kirk House).

Road Safety for visitors and other road users:

While it's not illegal to reverse out of a driveway onto a main road, the highway code (201) is very specific about reversing in and driving out of a driveway to prevent any serious collisions. The proposal to reverse out of a single track parking area onto Malt Kiln Lane (the main road running through the village of chipping) in its proposed location seems very dangerous.

Malt Kiln Lane is a busy little road, used by many vehicles including large articulated lorries visiting Proctor's cheese factory, tractors with trailers visiting the many local farms, cyclists, walkers and horse riders.

The proposed access point is also located on the brow of a hill and on the boundary of a national speed limit section of road.

Visibility for the driver reversing out of the proposed parking area would be very poor due to the height of the road side retaining stone wall. We'd imagine the vehicle will need to back out half way onto Malt Kiln Lane before the driver is able to see if it is clear to proceed due to the curve in the road.

We think visibility of the proposed access point to other roads users would also be extremely poor due to the height of the retaining wall on the right hand side, the right hand bend in the road and the topography of the road at this point i.e. the brow of a hill. Please see photograph below:



This part of the scheme seems to be poorly thought out and dangerous.

A traffic survey would highlight the frequency of traffic on this road and the speed at which vehicles approach the brow of this hill (national speed limit).

Surely the potential risk of a road accident at this point on Malt Kiln Brown outweighs the benefit a single holiday lodge would bring to the village of Chipping.

Impact of visitor parking area.

The proposed parking area carved into the natural bowl for one "luxury 4x4" vehicle, we think, would have a negative impact in the Kirk Mill Conservation Area and it's 'natural bowl'.

As stated above, the natural bowl was deemed an important contributor to the Kirk Mill Conservation Area by the Conservation Officer of the RVBC. Damage to the hillside to create a vehicle parking area should not be permitted, as we think this may contravene Ribble Valley Core Strategy Key Statement EN5.

Any changes to this hillside would have a negative impact on the heritage assets and setting of the Kirk Mill Conservation Area, Kirk Mill and it's mill pond. Please see photo below showing the natural bowl and its dominance in the Kirk Mill Conservation Area. This section of the natural bowl is very important to the visual setting of the heritage assets in 'The Grove' – which are nestled within the natural bowl.



Impact of construction vehicle access.

Application 3/2020/1037 does not provide any details on the provisions for construction vehicles.

Malt Kiln Lane is narrow at the proposed access point – with no provision for construction vehicle parking.

How would construction vehicles, including lifting equipment for the large pre-fabricated components of the holiday lodge, safely access the site at the very top of the hill without creating hazards to other road users?

As stated above, the natural bowl is an important contributor to the Kirk Mill Conservation Area. Damage to the hillside to create temporary access for construction vehicles should not be permitted – we think this may contravene Ribble Valley Core Strategy Key Statement EN5.

Any changes to this hillside would negatively impact the heritage assets and setting of the Kirk Mill Conservation Area, Kirk Mill and its mill pond.

Any large construction vehicles allowed to park alongside the mill pond could potentially obstruct farm vehicles, articulated lorries visiting the cheese factory daily, large emergency vehicles such as fire engines and create unnecessary hazards for other road users.

Limited Tourism

We don't think the proposed 'benefits' created by the offer to open up the family owned holiday lodge to "limited tourism" would counteract the impact this modern structure would have on its setting and surrounding heritage assets.

It seems a vein attempt to gain planning permission by suggesting the holiday lodge being opened up for 'limited tourism' and the jobs created for a cleaner / maintenance person and the increase in footfall from 1 single family (maximum of 2 adults + 2 children) would be a 'significant' benefit to the village.

What definition has been provided for 'limited tourism'? – would for example the holiday lodge be available for rent by the general public 1 week of the year, 10 weeks of the year or say 50 weeks of the year?

What control measures would be put in place to prevent this holiday lodge from becoming for 'private use only' in the coming months / years once planning permission was granted?

Public amenities

As the proposed holiday lodge would be offered for 'limited tourism' – surely reasonable provision should be made for most people to gain access to the dwelling included wheelchair users, as per Building Regulation M4(1)

It seems the holiday lodge itself has been designed with provisions for most people, including wheelchair users – this includes level floors and easily negotiable internal spaces.

However, Regulation M4(1) also states new dwellings should make reasonable provisions for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey.

The plans do not show a safe and convenient approach up the steep gradient of the hill, from the parking space to the proposed holiday lodge for everyone, including older and disabled people and some wheelchair users.

No 'inclusive' approach route is suggested (e.g. gentle slope / ramps or stepped approach with a suitable ground surface), just a meandering mown grass path, which seems to be exclusively for use by able-bodied people only, not inclusive to everyone - perhaps only private use was in mind when this was planned out...?

The ascent is shown as 9M from Malt kiln Lane up to the entrance steps of the proposed holiday lodge siting.

The photo shown below was copied from the preliminary ecology appraisal dated 12th February 2021 and nicely demonstrates the steep ascent from the road to the site.



Impact on existing wildlife

We note the preliminary ecology appraisal dated 12th February 2021 states: "there were no incidental field observations of any birds, mammals, amphibians or reptiles".

Every evening at dusk for the past three weeks a tawny owl has been seen and heard visiting The Grove and Mill Pond area, hunting in the short grasslands around Grove House & Grove Square.

Residents of The Grove have video footage and photographs of the owl.

The most recent photograph of the owl is shown below – the owl is sat on the fence post between the land dividing Grove Square and Seed Hill.

Deer also regularly visit the area, notably walking along the ridge of the natural bowl adjacent to Grove House up to Seed Hill – please see photographs below:



Conclusion:

Having raised our concerns regarding planning application 3/2020/1037 above, we think the proposed modern construction holiday lodge would have a significant and negative impact on the Kirk Mill Conservation Area and it's heritage assets .

We think the very limited proposed public benefits of sustainable construction and employment would not outweigh the harm to the designated heritage assets and their setting, the potential increased risk of a road accident created by the parking area, and the disturbance to the local wildlife (owls, bats and deer).

It's very bemusing to understand why RVBC planning officers would deem this a suitable proposal at pre-application stage to go through for planning consideration, when the natural bowl and the heritage assets within it have been placed under protection via the introduction of the 'Kirk Mill Conservation Area' in 2010 – then deemed so special it was extended in 2011 to encompass the whole 'natural bowl' and the mill pond weir.

The proposed positioning of this holiday lodge is within the Kirk Mill Conservation Area and therefore must be considered a threat to the protection of this special area. If this poorly thought out application is approved, what was the point in creating the Kirk Mill Conservation Area, if it wasn't to protect this area of special architectural and historic interest?

It's our opinion the field should continue to be used for animal grazing (horses and sheep) and a natural habitat for local wildlife to hunt, breed and feed.

Thank you for taking the time to read our comments.

If you wish to discuss this matter with us further please do not hesitate to contact us.

Best Regards,

