



F.A.O Adam Birkett
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA
planning@ribblevalley.gov.uk

Date: 25/04/2021

Dear Sirs,

Planning Application: 3/2021/0311
Brockhall Farm, Brockhall Village Old Langho BB6 8BB

We wish to make you aware of a number of objections that we have with regard to the proposed development (application noted above). Our specific objections predominantly relate to the proposed access route via the back of Larkhill Cottages.

Core Strategy DMG1

The following points from Core Strategy DMG1 have not been adequately considered or detailed within the planning documents:

- 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.'**
- 3. 'Consider the protection and enhancement of public rights of way and access.'**

- The proposed access route via Larkhill is a private un-adopted single track road at the back of Larkhill Cottages and also Pendle View and Bradyl Court (Brockhall Village)

The section behind Larkhill Cottages (No's 11-25) is owned and maintained by Larkhill (Old Langho) Maintenance Co. Ltd - this section is topped with a thin layer of tarmac to enable swept access for refuse collections to the rear of the properties, this section is 196 metres long & 3.5m wide + 1m wide footpath. This section is regularly & continuously used for parking for the residents of Larkhill cottages as there is insufficient parking at the front, which, when vehicles are parked restricts the clear passage to 2.4 m wide with cars parked fully on the footpath & half of the road.

It does not conform to adoptable standards as noted in the highways response.

Current recommendations for an adoptable road are that it is a minimum of 4.5m wide with an additional 2m wide footpath,

4.1m is the minimum recommended width for 2x cars to pass comfortably

4.8m is the minimum recommended width for 1x car & 1 x rigid vehicle (HGV) to pass comfortably

5.5m is the minimum recommended width for 2 x rigid vehicles (HGV) to pass comfortably

[See photos Parking 8, 10 & Track width 1-4 & Dirt track 1-3 - Pg`s 33,35,48,49,50,51,5,6,7]



This leads to a single 'rough' gravel farm track adjacent to the rear of Pendle View & Bradyl Court owned by Brockhall Village Ltd, this section is not tarmacked and is 177Metres long and 2.4 metres wide (not inclusive of the narrow grass verges at either side) this goes up to the cattle grid which is the boundary to the applicants land.

Neither of these sections conforms to adoptable standards as stated by LCC Highways in previous application report and they are unable to be widened to provide passing points or additions of pavements.

Note. Measurements have been taken accurately using a wheeled measure.

[See Photos Dirt track 1-3, View from cattle grid down track towards Larkhill, pedestrian 177m away - Pgs 5,6,7,56,37]

Neither of the sections of the access route currently have regular or heavy vehicular traffic and currently are not in a state of repair to cope with access for the construction related vehicles and then future vehicle access associated with the 8 further proposed dwellings.

Specifically the section owned by Larkhill Maintenance Co. Ltd is in poor condition – collapsing into the adjacent field, displacing the kerbs and pushing the fence posts over. It's maintenance is our responsibility and we have identified these issue however due to the high cost of repairing the entire section we are currently only able to patch sections in order to make it safe. Quotes received were in the region of £20,000 for full repairs.

It is worth noting that we made an informal approach for a financial contribution towards this approximately 2 years ago & the applicant refused to contribute, we had insufficient funds to undertake the repairs so it was temporarily patched up to make it safe. To the best of our knowledge & according to the documents we have available to us, the applicant has never in 15+ years financially contributed to the upkeep of the road (despite him being legally obliged to do so).

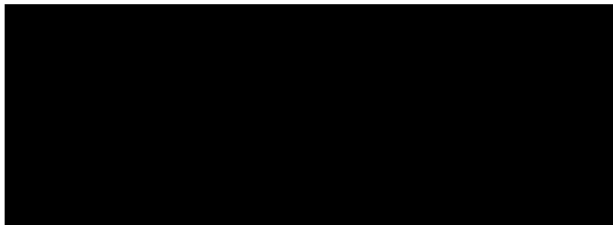
The track was never built to highways standards for regular use or heavy construction traffic use (some HGV's can be up to 44 tons and 2.9m wide excluding mirrors) and is totally unsuitable for this purpose as it was only designed for occasional farm access. Increased traffic will inevitably result in further damage.

[See photos Track condition 1-4 - Pg`s 41,42,43,44]

The drainage is also ineffective & the road regularly floods under heavy rainfall as the public surface water drains are broken & blocked; we have been trying unsuccessfully for years to get LCC to repair them only to be told we are not high priority & they have no funds available.

[See photos Track Flooding 1-3- Pg`s 45,46,47]

One of our main highway concerns is that the proposed access is a single track **961m long** from the adopted road at the bottom of Larkhill to Brockhall Farm and **for a continuous distance of 396 METRES there are NO PASSING PLACES** over this entire length from the adopted highway at the bottom of Larkhill Cottages to the proposed first passing place (on the applicants land, furthest away



from the farm complex) just beyond the cattle grid. There is also no scope, to upgrade or widen any of this section of the track or install any passing places to make it suitable for 2 vehicles to pass, as the applicant does not own any of the track; he also does not own any of the adjacent land (it belongs to Hacking Hall Farm, which in turn is owned by the Dunkenhall Estate.

For the above reason there is also no scope for a footpath or cycle path. The proposed access route would lead to compromised safety of walkers due to the significant increase in vehicle access. The route is heavily used by many families and dog walkers from Old Langho and Brockhall Village and connects to a network of well used public footpaths. This amenity is of great importance to the local community.

[See photos Track condition 1,3 , Farm boundary plan, Larkhill Ownership roads plan, pedestrian 177m away, Distance to adopted Road plan - Pg`s 41,43, 10,14,15,37,8]

The section of the track owned by the applicant from the cattle grid at the boundary down to the farm & proposed development is 496 Metres Long and this does have scope for 'improvements' but no specific detail has been provided.

The Applicant's site location plan shows 3 x proposed new passing places , common sense would say that if 3 additional passing places are required over a distance of **496 metres** on the applicants section of track, then additional passing places would also be necessary on the remainder of the track which is distance of **396 metres**, currently there are NO passing places in this section of the access route.

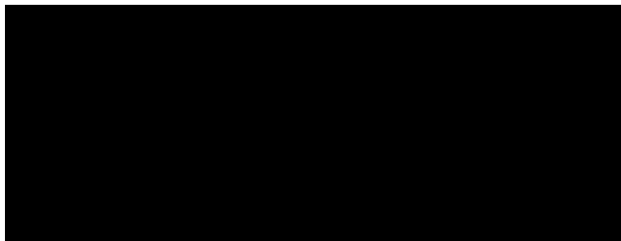
Additional traffic, especially heavy construction traffic having to reverse over such a long distance when clashes occur will be extremely dangerous especially as the whole length of the track is unlit.

Note. Measurements have been taken accurately using a wheeled measure.
[See Passing places Plan & Distance to adopted road Plan - Pgs 36,8]

Car parking on Larkhill is extremely difficult as when the houses were built in the 1930`s , all the residents worked at Brockhall Hospital & very few had their own vehicles, as such (with the exception of the 6 semi- detached properties close to the entrance who have private drives) there are no official parking spaces. Times have changed & now most households have at least 2 cars, some have 4 or more, so the residents park their cars around the green at the front of the properties, half on the pavement & half on the road. There are far more cars than spaces around the green so many also currently park on the back track the applicant is proposing to use for access, if these residents were no longer able to park on this track it would cause chaos on the roads of Larkhill in front of the houses. It is also worth noting that all the gardens at the front of the properties lead directly onto the road which has a 30mph limit (which is already dangerous).

On average there are usually over 100 residents` vehicles parked around the estate, many of which are on the back track. This figure does not take into consideration visitors. Residents already have conflicts regarding parking and it is always brought up as an issue at our AGM.

[See photos PARKING 1-10 Pg`s 26,27,28,29,30,31,32,33,34,35]



Cars often park close to the junction of the track & the adopted road at the bottom of Larkhill making the junction dangerous , it also has no give way sign.

[See photo PARKING 9 Pg 34]

Core Strategy DMB5

'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.'

- Footpaths - The section of the access track adjacent to the rear of Pendle View & Brady Court from the top of Larkhill to the farm boundary near the cattle grid is a public footpath that leads to further public footpaths. The proposed access route would lead to compromised safety of walkers due to the significant increase in vehicle access. This amenity is of importance to the local community and is heavily used by many families and dog walkers from the area.

[See Public footpath map & Photo Dirt track 1, farmers track & public footpath -Pg`s 38, 5,11]

Core Strategy DMB2

'The proposed use will not cause unacceptable disturbance to neighbours in any way.'

- The back gardens from the houses from the bottom of Larkhill up to the cattle grid back directly onto the proposed access route track, some as close as 1m away. The extra traffic generated by the development of the site, and subsequently the extra 9 dwellings on site, will cause significant disturbance and possible safety issues to houses backing onto the access road.
- There will inevitably be a significant decrease in air quality with the additional fumes and dust from extra traffic so close to peoples houses.
- Loss of privacy and security from additional traffic & pedestrians.
- It is inevitable that any additional traffic on the single track is likely to create clashes and an overspill onto Larkhill of vehicles trying to take a short cut & deviating from the right of way access to & from the farm creating an unacceptable disturbance & also additional safety issues.

[See Photos Track width 3, Parking 8, Larkhill ownership roads plan- Pg`s 50,33,14]

'The access to the site is of a safe standard or is capable of being improved to a safe standard without harming the appearance of the area.'

- As detailed above the current state of the access road is not appropriate to provide access for the proposed development. The details of how it could be improved have not been discussed in any detail in the planning documents. The details are important to determine whether any improvements could be made and also whether these would be appropriate to maintaining the appearance of the area, as an area of open countryside.

[See Photos Track condition 1-4, Dirt track 1-3 -Pg`s 41,42,43,44,5,6,7]

Core Strategy - DS1 & DMG2

Brockhall Village - Tier 2 Settlement. The proposed development is directly next to, but not within the boundaries of Brockhall Village, it is neither an expansion or consolidation of Brockhall Village. It will have no vehicular, cycle or foot access to the village.



[See photos View from Brockhall farm towards original access & Brockhall Village 1, Brockhall Farm & original access 1, View from field showing proximity from Brockhall Farm to Brockhall Village 1 - Pg's 52,2, 57,58]

Core Strategy - DS2 & DMH4

The development will result in the loss of agricultural use of the buildings/land from a working farm to a housing development.

Core Strategy Policies: DMI2 & DMG3

The following will contribute to the lack of opportunity to minimise the need to travel by private car

- The development is outside of the Brockhall boundary and the proposed access does not connect the development to the village.
- The proposed access track currently has no footway or cycle path. There is no scope for a footway or cycle access due to insufficient surrounding land (as mentioned above) – without these provisions the increase in vehicles accessing the road would make it unsafe for access via foot/cycle.
- There is currently no footway from the section of road from the cattle grid to the farm and no mention in the plans for the inclusion of one. – this would be possible. This would make this section particularly inaccessible for cyclists or people with impaired mobility. The public footpath deviates from the access track across the field, following the boundary adjacent to the woods

[See photos Farmers track & public footpath, Farmers track 2, Public footpath map -Pg's 11,12,38]

- Lack of access to public transport & amenities

The nearest bus stop accessible via public footpaths & public roads is 1,546 m away from the proposed development, located at the bottom of Brookside which has 1 very infrequent service – on average less than once per hour in either direction. There is a closer bus stop located on Brockhall Village outside the Academy, however as there are currently no plans for pedestrian access through Brockhall Village, this wouldn't be available to new residents.

Note. Measurements have been taken accurately using a wheeled measure.

- The next closest access to public transport is Langho train station which is 2.1 miles away (Google Maps distance).
- The proposed access is unlit making it dangerous for pedestrians at night.
- The public transport network would be inaccessible for anyone using a wheelchair or anyone with impaired mobility as the proposed development is not connected to Brockhall Village and is too far away using the access track & public footpaths, most of which are unmade gravel and across fields.
- The LCC School bus service 775 which links Brockhall Village to CRG School is being discontinued.
- The distance of the development from shops and other amenities is not within walking distance.

Larkhill (Old Langho) Maintenance Co. Ltd.
Accounts Office Cunliffe House Farm,
Longsight Road,
Langho, Blackburn,
BB6 8AD



[See Photo Dirt track 2 , Public transport plan 1 & 2, - Pg`s 6,39,40]

Concerns regarding Protected trees.

There are several protected trees both at the entrance to Larkhill (privately owned by Larkhill Maintenance Co. Ltd.) and also 39 along the farm track, the applicant has no right to maintain these trees as they are not on his land and are all privately owned. Some of these trees over hang the track down to just 2.7m from the ground, we are concerned that HGV & other similar construction traffic (which can be up to 4.9 m high) will cause extensive damage to the trees. The pictures clearly show the extent of overhang.

This issue has been flagged up as part of the application and we ask that the application, if approved, is subject to conditions relating to appropriate treatment of the trees and not to let construction commence until the issue has been dealt with.

[See Photos Trees 1, Dirt track 1, Track flooding 3, view from cattle grid down track towards Larkhill - Pg`s 53,5,47,56]

Concerns regarding safety & security

With any increase in traffic (vehicular and pedestrian) comes an increase in risk to both safety & security of residents, who up until now have enjoyed a safe & quiet environment, this could be in jeopardy if this development is allowed to go ahead.

We would like to put it on record that we are disappointed by the highways response - we would have expected that they would have insisted that an access road of adoptable standard be necessary, and formally objected to the development on the grounds that this is not possible.

Whilst the main section of the access road are not adopted, the same level of scrutiny should be given to the capacity of the access road to safely accommodate the type and level of traffic that will be generated by the proposed development. The NPPF and local planning policy does not differentiate between adopted and non-adopted roads.

[See Photos View from field showing proximity from Brockhall farm to Brockhall Village 1, View from Brockhall farm towards original access, Brockhall farm & original access 1 & 2, Distance to Brockhall Original access plan, Passing places plan. Distance to adopted road plan - Pg`s 57,52,2,3,55,9,36,8]

For the reasons outlined above we urge you to refuse planning permission on this application.

Yours faithfully,

[Redacted signature block]