

[REDACTED]

[REDACTED]

4th July 2021

Dear Ms Bowers

Re: Planning Application 3/2021/0595

Thank you for again inviting our views on the above planning application which lies close to our property.

We live at [REDACTED] which is a semi-detached property [REDACTED]
[REDACTED] is immediately adjacent to the proposed development.

We have major concerns about this application, as it appears to pose significant health & safety, traffic, flooding, environmental and nuisance impact. This is the third time this application has been submitted, so do please forgive the repetitive nature of this response – little in the application has changed.

1. Access, Traffic and Safety

The proposed plan uses the existing entrance to the field in question. It is a concealed entrance on Preston Road, just as the speed limit drops from National Speed Limit to 30 (and then 20) mph. The road itself is the main Ribchester – Longridge / Preston thoroughfare B6245.

1.1 Emergency & service vehicle access

- The existing opening is narrow and involves a tight turn. Currently, should the properties in this area require the emergency services, access would be from the main road. Waste is also collected from the main road. But the proposed lodges / snail farm would be set back from the road, making it necessary for the emergency and waste collection services to gain access through this narrow entrance. Our window cleaner, who drives a medium-sized van, commented just last week how difficult he finds it to emerge from this opening, given the

narrowness, poor vision up and down the road and speeding traffic. Presumably, bin lorries, snail delivery vans and emergency services would also find it difficult and dangerous.

- The plans do not include modification of this narrow access point. Indeed, it would be difficult for modification to be organised, as the owner of this land was unaware of the plans. There is insufficient space for creating a swept path and no evidence of a swept path analysis for safe access and egress was included in the application.
- We would like to draw the Planning Committee's attention to the Highways response to this application, which supports this point:

"The existing access on Preston Road requires improvement to accommodate the intensification of use. The single vehicle width access requires widening to allow 2 vehicles to pass side by side at the junction of Preston Road and the visibility splays require improving by the trimming of the vegetation and boundary hedge. The speed limit on Preston Road at this point is 20mph, increasing to 30mph approx. 50m to the north west of the site access. The visibility splays need to be a minimum of X2.4m (set back distance from the edge of carriageway) by Y25m (in both directions along Preston Road to the kerb edge)."

Highways and Transport, Lancashire County Council Response, 29/06/2021

- The site layout does not appear to include sufficient space for a turning head which is, we believe, a requirement for new developments.
- Interestingly, there *has* been a wider road built, without planning permission, which runs down adjacent to the site. But this is not part of this current application, at the time of writing.

1.2 Access safety: Speeding

- Preston Road is on a downwards slope from Longridge towards Ribchester. Traffic is supposed to decrease in speed from the National Speed Limit area into an urban 20mph at this access point, but frequently fails to do so. The location is used by Lancashire Police to site a mobile speed camera at this location on account of speeding traffic. Visitors staying at the proposed holiday lets may not be familiar with the hazardous nature of this stretch of road and the chances of a serious accident will be significantly increased. The area is popular with motorbikes and cyclists, who are at particular risk and tend to be making good speed down the hill. This stretch is a well frequented part of the Lancashire Cycle Route 90.
- Emerging from our driveway involves an external roadside mirror, patience, regular trimming of overhanging vegetation and the road to be clear both ways. It would be made much more difficult by the presence of increased traffic trying to do the same thing a few yards away. This problem is likely to be compounded given the fact that our next-door neighbours would lose their parking, thus forcing them to park on the road, should the development go ahead.
- The absence of any pavement on this side of the road also endangers the safety of holidaymakers walking on the road to get to the amenities in Ribchester. Mobility-impaired visitors to the development might find this particularly difficult – particularly pertinent as

the applicant states that one of the log cabins has been reconfigured to allow use for persons with disabilities with carers (stated in the covering letter).

1.3 Traffic generation and noise nuisance

- Six 3-bedroom lodges and a small business would significantly increase the amount of traffic in the area which will have a detrimental effect on noise and air quality.

1.4 Access to rest of field

- The proposed development uses half of the existing field. The plans give no access to the lower-lying remainder of the field, which might have implications for routine maintenance. To compress the flock into the reduced area, which is frequently waterlogged, is unlikely to work.

1.5 Safety of holidaymakers / Nuisance impact

- The proposed development is to be unmanned. Should holidaymakers have a problem or emergency, they would have no recourse but to knock on the doors of adjacent houses. I think I can speak for my neighbours in that none of us wish to be an unpaid concierge service.

2. Environmental, Water Management and Flooding Issues

2.1 Flooding

Ribchester was one of the worst-hit areas in the Boxing Day floods of 2015. Homes had to be evacuated and businesses closed. More recently, on 9th February 2020, Ribchester was again flooded causing another emergency that led to homes and businesses being seriously damaged. The addition of a substantial amount of hardstanding for the foundations of the lodges, snail farm and roads / parking areas will significantly increase the risk of flooding to our and neighbouring properties because they reduce the land drainage available to cope with water run-off.

A former owner of Pendle Crest View (the adjacent property to the site, in a North West direction) is a retired River Bailiff. He tells me that he has watched herons picking fish out of the field on the site, when Boyce's Brook has flooded.

The flood report cites significant flood risk; we draw the Council's attention to the following, on pages 19 and 20 of the report.

Table 3: Possible Flooding Mechanisms

Source/Pathway	Significant?	Comment/Reason
Fluvial	Yes	Flood Zones 2 and 3 (Boyce's Brook)
Canal	No	Not Applicable
Tidal/Coastal	No	Not Applicable
Reservoir	No	EA Map shows that the site is located marginally within the area affected by reservoir flooding.
Pluvial (urban drainage)	No	Drainage to be addressed by architect/developer
Groundwater	No	SFRA states that groundwater flooding within the area is not considered to be a significant risk
Surface Water Flooding	Yes	Site is located within an area that has a high risk of pluvial flooding
Overland Flow	Yes	High risk associated with surface water flooding
Blockage	No	Not Applicable
Infrastructure failure	No	Not Applicable
Rainfall Ponding	No	No areas of ponding identified within the boundary of the site.

Figure 1: Copied from Flood Report

We would quibble the statements about groundwater flooding and rainfall ponding. Whilst we acknowledge that we aren't experts in this field (unlike the people who wrote the report), we do have the advantage of observing the site year in, year out. The lower ground of the site ponds / floods regularly all winter and often in the summer at times of high rainfall.

This latest submission has rejigged the plans to move the holiday accommodation to the higher ground. While this will reduce the risk of flooding for the holidaymakers themselves, it does nothing to mitigate the increased risk to the rest of the village; indeed, the increased hardstanding will increase the risk downstream to the more vulnerable parts of the village, such as the areas around Greenside and the Ribchester Arms.

Ribchester, like many flood-prone places, has a very shallow rake to the drainage point; in this case, the main river Ribble, which sometimes behaves in a tidal manner. Because of this, seemingly minor disturbances to the water table can have a large effect. Since the new affordable housing was built adjacent to the Pope Croft car park, the car park has flooded regularly and, indeed, was unusable for much of last year.

In addition, there is significant building work going on higher up Preston Road. Again, this increased hardstanding is likely to exacerbate surface water flash flooding; we don't need more of it.

The Flood Report considers river and seawater flood risks. But this is not the sort of flooding that affects this part of Preston Road, which is much more at risk from flash flooding due to excessive surface water. When this happens, it runs past (or, very occasionally, *through*) our properties and on into Boyce's Brook or the culvert which runs under the pavement from the Old Police House towards the village, creating much more serious issues for the lower-lying properties in Ribchester.

The Government's flood warning tool produces the following map, which shows that the risk of surface water flooding is still a serious consideration, even despite the re-sited log cabins (see following image).

Figure 5.1: Environment Agency Surface Water Flood Map

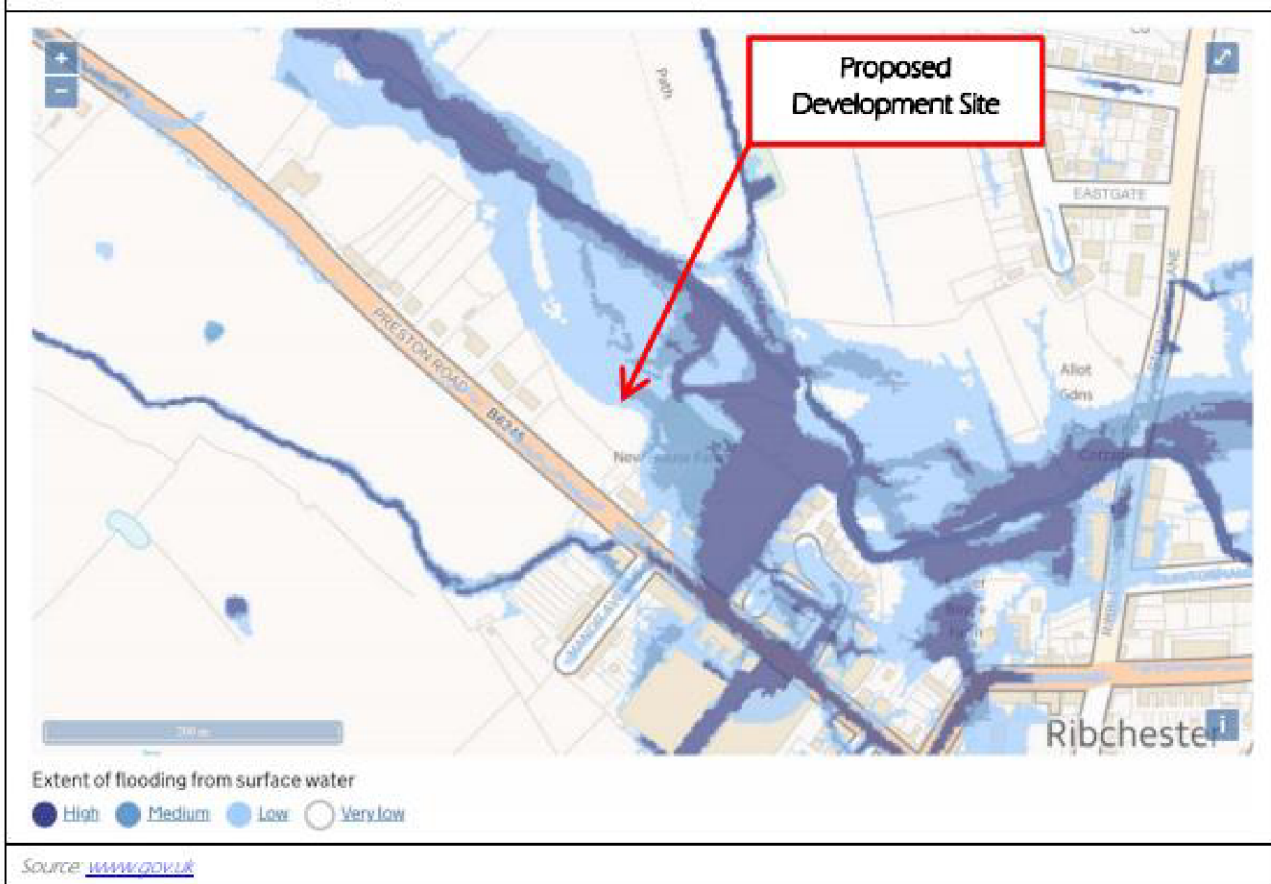


Figure 2: Flood risk area map, copied from <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastng=364681.88&northng=435582.19&map=RiversOrSea>

2.2 Sewage disposal

We had a look at the sewage provision. In the proposal, it is suggested that the development be served by a 'Package Treatment Plant'.

The foul water drainage channels are marked and run **uphill** to a Biodisc located on the edge of the development (marked on following diagram, Figure 3). This then drains straight into the land at this point.

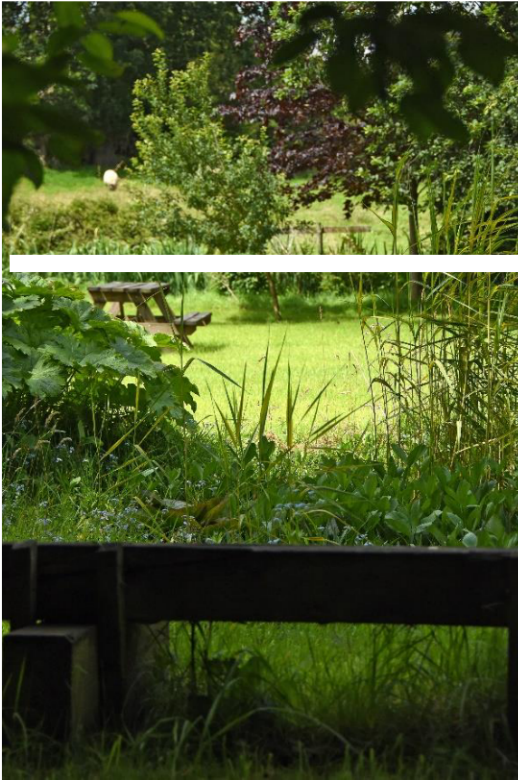
Researching sewage treatments using a 'Biodisc' system, it would appear it is far from maintenance-free. In addition, there would need to be some sort of pumping system in order for the (uphill) flow to actually reach the system. It is frequent for us to get interruptions to our power supply in Ribchester – often associated with times of heavy rainfall / flooding. In such a scenario, the run-off to Boyce's Brook which causes the main flooding issue in the village could potentially be heavily contaminated with untreated sewage from both lodges and snail farm. This is a severe

- The Ecology Report was incorrect in stating there were no ponds within 250m of the development. There are two ponds as well as a waterway which has appeared about 10 years ago, presumably due to the rising water level. They are located on our neighbour's land [REDACTED] and are a breeding ground for newts, frogs, toads and fish as well as a wide range of aquatic insects. They attract birds and wildlife resident in the nearby trees. It is a natural habitat that enhances biodiversity but would be severely compromised in the event of the neighbouring field being developed. A previous owner of [REDACTED] (who is an environmental engineering consultant) put in these ponds precisely to help with flooding to the rear of his property.
- The hardstanding created for the development and the disruption of natural drainage channels would increase runoff to the low-lying areas behind our houses, which lie below the water table and are already frequently waterlogged. The ponds were created to help alleviate this and have helped considerably; however, we are not confident they could cope with an increased load of water every winter.
- The ensuing increase in siltification will increase the risk of floods to our property as the land neighbouring Boyce's Brook is low lying and is regularly submerged during heavy rain as well as increasing the risk to the rest of the village and other sites around the Ribble.
- This land regularly floods with standing water during periods of heavy rain. As such, it is an important part of the water catchment management; more run off from this area would exacerbate the flooding problems around the low-lying areas further downstream, especially the flood-prone area around the Ribchester Arms.
- Any runoff which was contaminated by waste from the snail farm or an overloaded / faulty Biodisc would be even more damaging to the existing natural environment, as well as Ribchester residents and downstream towards Preston.

The following map (Figure 4) is taken from the Ecology Report. On it, I have marked the position and approximate size of the ponds. The Pond A has been planned and planted with increasing drainage and enabling biodiversity in mind. Already this year, we have seen frogs, toads, bats, newts, heron, jays, deer, dragonflies and hedgehogs in our own (adjacent) garden as well as found traces of badger damage! We have lived in this property since 1994, and can confirm that there wasn't this degree of biodiversity before the pond was put in.



Figure 4: Existing Ponds within 250m of the site



A view of the wildlife Pond A and viewing bench.

Everything above the white line would be the new development.

2.4 Priority Species

- The Ecology Report states there is no evidence of bat habitation. However, we frequently see bats.
There is a mature oak tree on the edge of the development (mentioned and photographed in the Ecology Report)
It is one of the oldest trees in the area and we often see bats on a summer evening zipping back and forth to the tree. The holiday lets with their associated lighting will inevitably be detrimental to them. The mature willows along the brook frequently shed branches which provide plenty of dead wood and potential habitat for summer bat roosts and winter hibernation for bats and hedgehogs. As the proposed development is bordered to the Northeast by the brook, health and safety concerns would surely involve clearing of this rich habitat.
- Badgers nest in the woods nearby – we have seen them and found evidence of their activity quite often.
- The ecological inspector reports having heard curlews – we see them most dry days in the Spring and Summer. They fly from the higher ground, north of the site (where we assume they have their nests) across the site and our back gardens on their way to the river Ribble, to the South West. They are frequently low enough to clearly see their markings.
- A former river bailiff has told us that Boyce’s Brook is starting to fill with trout after a long absence and he is hopeful that salmon might follow. Given the Ecology report’s observation that the habitat is suitable for water vole, it’s likely that the increasing biodiversity of this area could lead to safe haven for these shy and vulnerable species – if they are not disturbed by holidaymakers.

2.5 Other Wildlife Issues

- The increased human disturbance (which might include holidaymakers understandably enjoying Boyce's Brook) will bring an increase in noise pollution and potentially litter. There are many shy birds living in this area such as jays, tree-creepers, wrens and nuthatch that could be put off nesting in the area as they do now.
- The Riparian zone along the edge of this locally significant watercourse represents an important habitat that would be disturbed by occupation and development. This would also impact on the wildlife corridor that the area provides.

3. Noise, Disturbance, Overlooking and Loss of Privacy

3.1 Traffic noise – detailed above

3.2 The Snail Farm

- We don't know very much about heliculture (although we do seem to be able to grow an impressive number of snails ourselves, as keen veggy gardeners!). However it works, though, there are areas of concern... A quick internet search implied that a heliculture installation would involve heat & light – which will inevitably also generate a certain amount of noise.
- The application mentions that the snails would be for eating – in this case, presumably there would need to be some degree of processing done at the plant, which could add smells to the nuisance.
- We also have some concerns about escapee snails – never a very welcome visitor to our gardens!

3.3 The Holiday Lets

- The plans show how the six lodges would overlook gardens along Preston Road. As detailed in Section 1, the road is busy, as the back gardens are the only peaceful areas the houses currently enjoy.
- The application involves six 3-bedroom lodges of two different designs. Plans were



Figure 1: The site of the proposed development, from our bedroom window

only submitted for one of the lodges, but from this, it may be inferred that the lodges can accommodate 6 guests each.

- When fully occupied, adjacent properties could thus be overlooked by 36 people, in addition to workers at the snail farm. This is a significant invasion of privacy, as well as a potentially dangerous increase in the traffic congestion at the point where a 20 mph speed limit has been introduced to try to reduce the speeding traffic.

4. The Application

4.1 Lack of Consultation

We have additional concerns about errors in the application itself.

- The address of the company L'Escargotiere is given as 27 Inglehurst Road, rather than Inglewhite Road, as it was on the last application (and, indeed, is listed with Companies House).
- The application asserts that the field is currently vacant. The Ecological Report states (and has photos) that sheep are grazing on it.
- In Section 8 of the application, it would seem that no new public roads or rights of way are to be provided within or adjacent to the site. This is a distinct issue for the owners of [REDACTED] [REDACTED] who would lose access to their own field (the gate is onto the narrow driveway to the site). In addition, the lower-lying part of the site would then be cut-off, without access for maintenance vehicles.
- In Section 9, the application lists 16 new car parking spaces. From the site layout, one can count 17, as well as minibus parking.
- In Section 10, the application states that there are no significant trees or hedges on or adjacent to the development site. The Ecology Report contradicts this and makes some suggestions as to how work may proceed sensitively.
- In Section 20, the form asks "*Does this proposal involve the carrying out of industrial or commercial activities and processes*" to which the applicant has selected 'no'. We might have misunderstood the question, but what is the purpose of the snail farm / holiday lets if not as a commercial enterprise?

Some of these points, such as getting one's own address incorrect, seem petty – and they are. But we are concerned that such a lack of attention to detail doesn't bode well when the building is underway.

- The Ecology Report suggests that further investigation should be sought if more evidence of sensitive wildlife is found during the build and recommends that the bank of the brook should not be disturbed.

- The Biodisc will need maintenance. If raw sewage is being treated before being filtered back into the ground 60m uphill from our home, we would like to think that the company paid attention to 'small' details.
- The entrance clearly needs significant modification, as outlined by the Highways report.

4.2 Need for the Development

- Several similar lodges exist within a short distance of Ribchester. Moss Farm, Dale Hey Farm, Singleton House, Hobbit Hill, Samlesbury Hall, Ribble Valley Holiday Homes and Beacon Fell View (to name but a few) all offer very similar facilities to the proposed development within a 6-mile radius. It is hard to see what sort of additional need would be fulfilled by the development.

5. Ribble Valley Borough Council Core Strategy 2008 - 2028

The proposed development would seem to go against the Core strategy in several areas.

- **EN3 – Sustainable Development & Climate Change** states that new development should demonstrate how it will contribute towards reducing the Borough's carbon footprint. In addition, new developments should address any issues relating to flood risk (detailed in sections 2.1, 2.2, 2.3, 2.4 and 2.5)
There is no mention of any such address in the application.
- **EN4 – Biodiversity and Geodiversity** mentions that developments which adversely affect sites must demonstrate mitigation or compensation for deleterious effects (detailed in sections 2.1, 2.2, 2.3, 2.4 and 2.5)
We can't find any evidence of mitigation or compensation in the application.
- **EC1 – Business and Employment Development** details that development ought to prioritise development of appropriate Brownfield sites before alternatives are considered. The area is greenfield, not brownfield. There is a potential negative employment impact for the tenant farmer who currently uses the field (section 4.1), with little positive impact for the village (section 4.2)
- **DMG1 – General Considerations** Access points 1, 2 & 3 consider potential traffic implications, safe access and protection of access respectively. Related problems have been covered in section 1 of this letter.
Amenity points 1, 2, 3 & 4 cover 'not adversely affect(ing) the amenities of the surrounding area', privacy issues, public safety and air quality respectively. These considerations have been detailed in sections 2 and 3 of this letter.
Environment points 1, 2, 5 aim to ensure potential developments should not impact on environmentally sensitive areas and, where possible, enhance them. We have highlighted detrimental impact in section 2 of this letter and can see no potential upside to the environment to compensate.

- **DME3 – Site and Species Protection & Conservation** covers developments that may adversely affect priority habitats or species. This has been pointed out in section 2 of this letter.
- **DME4 – Protecting Heritage Assets** there does not appear to be any evidence of an archaeological survey.
- **DME6 – Water Management** states that ‘Development will not be permitted where the proposal would be at unacceptable risk of flooding or exacerbate flooding elsewhere’ (clause 10.17). The flood report is clear that such significant risk exists (detailed in sections 2.1, 2.2 & 2.3 of this letter), in that there is risk from surface water. In addition, the hardstanding of 7 buildings, parking spaces (17 car plus minibus parking) and associated road would increase run-off considerably, ‘exacerbating flooding elsewhere’.

Thank you for taking the time consider our concerns. It is much appreciated.

Yours sincerely,

