

received 01/07/17



EAL3 AG-1,

8<sup>th</sup> June 2017

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Forward Planning Regeneration and Housing  
Ribble Valley Council Offices  
Church Walk  
Clitheroe  
Lancashire  
BB72RA

- 8 JUN 2017

FAO	
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For the attention of Mr C Hirst

Dear Sir,

**HED DPD CONSULTATION**

**Potential employment allocation; Land at Higher College Farm, Hothersall [Site Option 3]**

I am writing to you on behalf of our Action Group called No Industrial Site for Hothersall to express our concerns regarding a proposal for employment land allocation at Higher College Farm, Hothersall ("the Proposal").

Our Action Group is a group of Hothersall residents that has come together to share our thoughts and assess the implications of the Proposal on our residential amenity and quality of life.

This letter is written for and on behalf of the Hothersall residents whose names and addresses are set out in the Schedule attached to this letter.

We have engaged with Hothersall Parish Council ("HPC") during consideration of the Proposal and we are pleased to support and endorse the views and findings set out in their letter to you dated 9<sup>th</sup> June 2017.

This letter is a summary of individual points relating to residential amenity and quality of life raised by members of our Action Group which we put forward in addition to the matters addressed by HPC. We anticipate that many of our members will also write to you to object to the Proposal in a personal capacity.

We recognise that not all of these points may carry weight in a planning balance as material planning considerations but we do believe in a planning system which encourages local participation and, in the spirit of natural justice, they should, as the views of the local people, carry some weight in the overall assessment of the Proposal.

We have considered a letter from Judith Douglas Town Planning Limited to your Council (the Letter") which supports and outlines the Proposal.

We have familiarised ourselves with the Core Strategy adopted in December 2014 insofar as it defines Longridge as one of several "principal settlements of the Borough" and expresses an intent to encourage employment development and growth in the future in Longridge with an overall allocation of 4.0 hectares of employment land to meet an identified need for 2.41 hectares of the same.

Further, we have considered Regulation 19 Housing and Economic Development DPD dated April 2017 and, specifically Policy EAL3, which proposes an allocation of 1.5 hectares of land for employment purposes within Longridge.

Whilst we acknowledge both the intent to allocate land for employment purposes in Longridge as set out in the Core Strategy and the proposed allocation in Policy EAL3 referred to above, for the reasons set out below, we do not think that Land at Higher College Farm is a suitable site to be allocated for employment purposes.

Having regard to the proposed business use classes for the site in the Letter, we do not believe that there is an evidenced or pressing need for the type of jobs which could be created at the site and that for this reason also, this site should not be allocated for employment purposes.

The reasons why we do not think that Land at Higher College Farm should be allocated for employment purposes are as follows:

**1) Totally inappropriate location**

This site is at the end of a poor access track situated in the middle of green fields in a rural, largely residential area. While close to the operations carried out by Brendan Andertons Butchers and Clegg's Chilled Food Service, this site is out on a limb and is not connected to the built-up areas of Longridge or the retail and business hub of Berry Lane. As such it is totally unsuitable.

Furthermore, the requirement to allocate land for employment purposes in Longridge should not be satisfied by allocating land in Hothersall.

We believe that there are other more suitable sites in Longridge which could be allocated for employment purposes but we question whether there is a real need for more commercial/industrial units in Longridge when there is already so much unoccupied space. Members of our Action Group have identified 10 vacant units in Longridge this week in addition to unoccupied premises on the Red Scar and Roman Way industrial sites close to Longridge. Faced with this available space, why is there any need to develop another new site?

There are also plenty of vacant premises in neighbouring parishes. Our Action Group members have found 3 vacant units in Ribchester, 3 in Mitton and more than 20 in Whalley, Clitheroe and Mellor located along the A59 corridor. The A59 corridor is the precise area highlighted in the Core Strategy as the most suitable area for employment development in the Ribble Valley.

We have reason to believe that previous opportunities to allocate land for employment purposes in Longridge have been missed and instead the land has been allocated for housing. A good example is the site at Chapel Hill next to the Recycling Centre where there is a new housing development being built but where it would have been more appropriate to site business units.

## **2) No evidenced or pressing need to create jobs here**

The Letter states that the floorspace yield from the site "would depend upon the precise nature of the employment uses" and assumes "standard single-storey industrial/warehouse units, the yield would be in the region of 6,000 square metres floorspace."

The proposed allocation is for B1, B2 and B8 business use classes. It would be fair to assume that the site could be used for offices or industrial processes such as manufacturing or for storage or warehousing or distribution or a combination of all these activities.

Where is the evidence that Longridge needs more jobs in these sectors to be created in this location and is there any guarantee that these jobs will be taken by Longridge residents? In our view, the Applicant, Mr Mark Hurst, should provide such evidence in the form of an up to date Economic Impact Assessment. Without this, his application is purely speculative.

Even if a need for such jobs can be demonstrated, should not such jobs be created within the existing employment framework, close to or at existing industrial/commercial sites in Longridge already benefitting from good transport and motorway links? Why would a brand new employment site in the middle of green fields in Hothersall be considered necessary or desirable?

It is extremely dangerous to assume that because a large number of houses are being built in and around Longridge a corresponding number of jobs needs to be created.

Without strong supporting evidence, we do not believe that there is any pressing need to create more jobs in manufacturing, warehousing and distribution at this location.

## **3) Visual impact**

We would like to draw your attention to the fact that a previous planning application to erect rural workshop units on this site in 2006 (application No 3/2006/0329) was refused on the grounds of both adverse visual impact and highway safety.

The first ground for refusal was that "The proposal is considered contrary to Policies G1, G5 and ENV3 of the Districtwide Local Plan and Policy 5 of the Joint Lancashire Structure Plan which seek to limit development in the open countryside to uses which are both appropriate to a rural area and meet identified local employment needs. Approval of such an application without sufficient justification would result in further development to the visual detriment of the open countryside".

The third ground for refusal was that "The proposal if approved would set a dangerous precedent for the acceptance of other similar proposals which would cause visual harm to the landscape and render more difficult the implementation of the established planning principles of the Local Planning Authority".

We are not sure what constitutes a "rural workshop unit" but if as the Letter suggests "standard single storey industrial/warehouse units" with "in the region of 6,000 metres floorspace" are to be erected at the site, the visual impact of such a mini commercial/ industrial estate here would be very damaging to the local landscape character (green fields and residential area) and the existing amenities. It would be totally out of place and we do not see how such a development could be justified based on the 2006 planning refusal.

The Letter makes little mention of car parking at the site. No doubt this will need to be provided and will also look out of place in a rural setting and "cause visual harm to the landscape".

We totally refute the claim made in the Letter that "development of the site for employment would be well related to the built-up area of Longridge without any undue visual intrusion". In the opinion of our members, nothing could be further from the truth.

We also disagree strongly with the statement in the Letter that "there is no reason to consider that a future employment development of my client's site would have any harmful impact on the amenities of any local resident". In our opinion, the erection of bland industrial buildings plus a car park in the middle of green fields would completely destroy the views from neighbouring properties and change the character of the area from rural to industrial.

Finally, the Letter states that "There are no natural features within the site other than a single hedgerow that separates the land immediately associated with the Higher College Farm and the pasture between these buildings and Blackburn Road." While this may be true, it must not be forgotten that this site is in the middle of countryside where it would be an aberration to site a mini industrial estate.

#### 4) Pollution

We note that the allocation refers to business use classes B1, B2 and B8. This causes us a great deal of concern because we question the logic of siting businesses which could potentially carry out industrial processes or have storage and distribution facilities in close proximity to a rural, residential area such as Hothersall.

There is every likelihood that such businesses will produce toxic fumes, pollutants and noise throughout the day and possibly the night too. Light, air and noise pollution in the immediate vicinity will inevitably increase.

Furthermore, if cars and heavy goods vehicles emitting diesel pollutants are regularly accessing the site, they too, will add to the levels of noise and air pollution. This could have a serious and deleterious effect on the local vicinity, its residents and flora and fauna.

In particular, traffic from the site accessing the M6 motorway will pass three schools, namely, St Cecilia's RC High School, Alston Lane Catholic Primary School and Grimsargh St Michael's C of E Primary School thereby subjecting children at each school to greater levels of diesel pollutants.

#### **5) Increased traffic congestion**

This site should not be allocated for employment purposes because its subsequent development will inevitably lead to an increase in traffic congestion in Longridge caused by cars, business and heavy goods vehicles regularly accessing the site.

Not only will there be increased traffic congestion in Longridge itself but all routes out of Longridge, particularly to the motorway network, will become congested. Villages such as Grimsargh, Goosnargh and Ribchester will also feel the brunt of the additional vehicles on their roads. In particular, Grimsargh and Ribchester villages are both traffic "bottlenecks" and cannot sustain increased traffic from heavy goods and other vehicles.

The Employment Land Review 2013 referred to in the Letter states that the site "is well connected in that access back to Preston and the M6 motorway would not necessitate road traffic passing through the town". While this is true up to a point, traffic accessing the site will have to travel through the speed restricted residential area of Lower Lane, past Chapel Hill and directly past the drop off and pick up areas of St Cecilia's RC High School which is congested at peak times. We do not think that this is at all desirable.

The site is a long way from the M6 motorway. Consequently, traffic from the site will be forced to use narrow minor roads and bridges to reach the motorway network and trunk roads. These local minor roads and bridges, e.g. Skew Bridge in Grimsargh, and the Ribchester Bridge (De Tabley) in Ribchester/Clayton le Dale are not designed to carry heavy goods vehicles. Indeed, the latter has a mandatory length restriction for heavy goods vehicles travelling over it, thereby making it impossible for long vehicles to travel to the A59 or Blackburn in the most direct way.

Several local bridges have recently suffered damage from an excess of heavy vehicles travelling over them and they simply cannot deal with the increased traffic without becoming gridlocked.

Vehicles from the site accessing the M6 motorway would pass through one of three protected Longridge Conservation areas, namely, St Lawrence, Market Place or Stonebridge.

In our opinion, if this site is allocated for employment purposes and industrial businesses are allowed to operate on it, the resulting increase in traffic and congestion on local roads will be significant and will also cause major disruption and delays to local businesses and residents.

## **6) Poor local transport links**

It does not make any sense at all to allocate a site for employment purposes in an area where transport links are so poor. This kind of development which is presumably designed to provide employment for a number of people would be more conveniently sited near the motorway network and/or a main train line rather than in a rural setting in the middle of nowhere.

There are no bus services to and from Preston near the proposed site as this service runs from Longridge Post Office which is at least a mile away from Higher College Farm. The bus service on Blackburn Road to Chipping, Clitheroe and Blackburn is once every two hours. We doubt whether these services are sufficiently frequent or adequate.

In our view, it will be absolutely essential to drive or cycle to the site. This poor location coupled with the inadequate public transport links are both good reasons why the site should not be allocated for employment purposes.

## **7) Safe access and risk to local amenities**

The current access onto Blackburn Road is via an unmarked and unlit track. The site will inevitably require a new, wider access onto Blackburn Road that could handle the increased traffic from cars and heavy goods vehicles. Turning right or left onto Blackburn Road is not easy due to visibility issues and the speed of the oncoming traffic.

It is worth noting that the 2006 planning application to build rural workshop units on this site (3/2006/0329) previously referred to was refused on the ground of highway safety. The reason given was that "The proposal is contrary to Policy G1 of the Districtwide Local Plan in that it would lead to conditions to the detriment of highway safety. This is due to the increase in turning movements in the existing access located on the derestricted length of highway where overtaking manoeuvres frequently occur."

Since 2006, the volume of traffic travelling in and around Longridge has increased significantly and turning in and out of the access track to this site has become harder not easier. This leads to the inevitable conclusion that this site should not be developed on the grounds of highway safety.

The proposed site is not far from a blind bend at the Corporation Arms with bad visibility for oncoming traffic where drivers often fail to indicate whether they are turning right or left or just going straight on. The Corporation Arms junction is already a well-known accident hotspot with more than one fatal and numerous serious road accidents occurring there in recent years. Red tarmac and hatching on the road already warns drivers to be vigilant.

In the opinion of our members, the creation of a wider access onto Blackburn Road to access the site will cause an even greater hazard for road users. Contrary to what is stated in the Letter, we do not believe that safe access to and from the site can be guaranteed.

The Letter is incorrect in stating that "there are no immediate existing residential neighbours." The proposed site will be opposite the new Tootle Green housing development on Dilworth Lane. We question the desirability of locating an employment site so close to a brand new residential area which is still not yet fully occupied. The allocation of Land at Higher College Farm for employment purposes could act as a serious deterrent to would be purchasers at Tootle Green as it is hard to understand why anyone would knowingly buy a brand-new house in close proximity to what is likely to become a mini industrial estate.

The site is close to two children's playgrounds at Cromwell Fields on Lower Lane and at Tootle Green, respectively and is virtually opposite a bridleway popular with horse riders called Tan Yard Lane as well as the new Longridge Loop Cycle Way and two popular public footpaths.

We do not think that heavy goods vehicles accessing the site should be anywhere near these local amenities and should not create more hazards for road users, pedestrians, children, cyclists and horse riders than already exist on our local, busy roads.

Our Action Group members would like to draw your attention to Paragraph 10.4 of General Policy DMG 1 of the Adopted Core Strategy concerning Access which aims to ensure that "safe access can be provided which is suitable to accommodate the scale and type of traffic likely to be generated".

We do not think that there is any possibility that "safe access" to the planned site can be provided given the proximity to a busy main road, a blind bend and a well-known accident black spot. Furthermore, such "unsafe access" could well put other road users, pedestrians, cyclists and horse riders at greater risk of an accident, fatal or otherwise.

#### **8) Poor drainage and risk of flooding**

While it may be true that the proposed site lies within flood risk zone 1 and is therefore at the lowest risk of flooding, the safety of the access cannot be guaranteed in all weathers. It is noticeable that after heavy rain there is often a large quantity of surface water on Blackburn Road close to the Tootle Green housing development which can be hazardous and requires traffic in both directions to slow down and use one side of the road. This in turn can lead to traffic congestion.

If the Proposal were to go ahead, this possibility of local flooding due to poor drainage would need to be resolved once and for all. This could be very costly and disruptive.

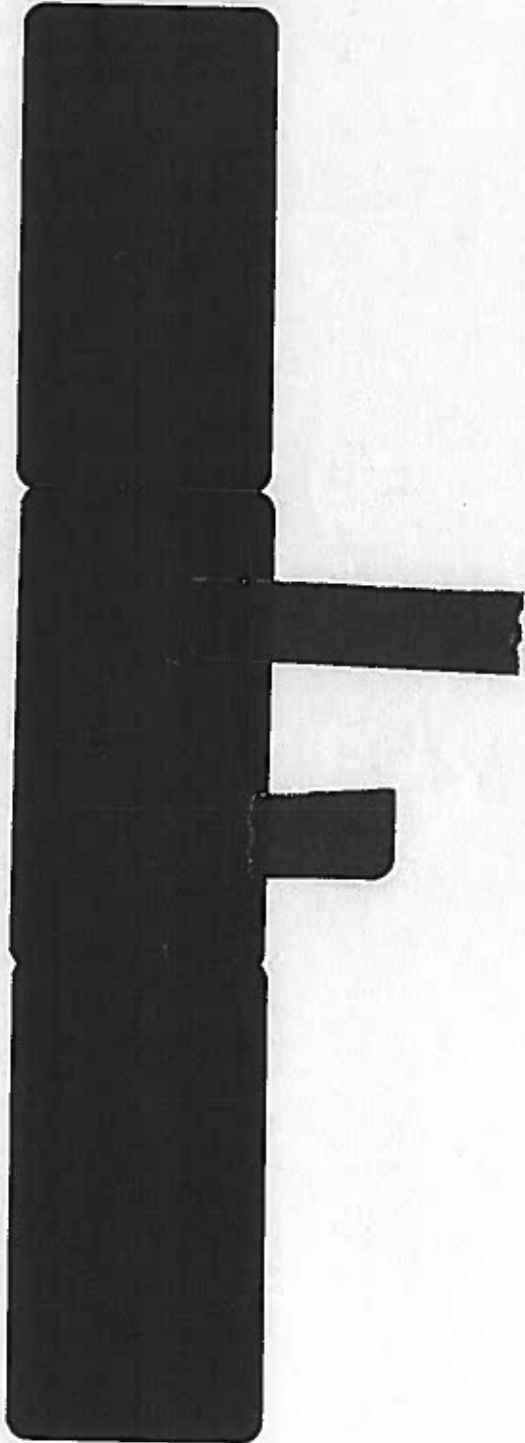
No doubt the site itself would require mains water, drainage and sewerage supplies to be installed which would also prove to be extremely costly and cause prolonged disruption in the immediate vicinity. Given the unsuitability of the site, we do not think that these costs or disruption can be justified.

**Enclosures: Plan of Local Heritage Assets and Biological Heritage Sites  
Letter from Jenny Draper to the Longridge News.**

**cc. Councillor Stephen Atkinson, Planning & Development Committee, RVBC  
Councillor Alison Brown, Chairman, Planning & Development Committee, RVBC  
Councillor Ian Brown, Planning & Development Committee, RVBC  
Councillor Bridget Hilton, Planning & Development Committee, RVBC  
Councillor Ken Hind, Leader, RVBC  
Councillor James Rogerson, Planning & Development Committee, RVBC  
Councillor Ian Sayers, Planning & Development Committee, RVBC  
Councillor Richard Else Sherras, Planning & Development Committee, RVBC  
Councillor David Smith, RVBC and LCC  
Mrs Cathy Thompson, Clerk to Hothersall Parish Council**



**Schedule of names and addresses of members of No Industrial Site for Hothersall  
(alphabetical order)**



Reference is made to the report of the members of the committee on the subject of the proposed amendments to the constitution of the Association of the United States and Canada, dated at New York, New York, on the 15th day of June, 1913.

Mr. J. B. ...  
New York, N. Y.  
June 15, 1913

Mr. J. B. ...  
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June 15, 1913

Mr. J. B. ...  
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New York, N. Y.  
June 15, 1913

Mr. J. B. ...  
New York, N. Y.  
June 15, 1913

**Proposed "INDUSTRIAL, WAREHOUSE  
& Office Development, Hothersall"**

**Designated on RVBC Reg18 Consultation Plans  
(2.2 Hectares ONLY)  
As a 'Possible' site for  
Employment Development**

**Forest of Bowland  
Area of Outstanding Natural Beauty  
(AONB)**

**Spade Mill Reservoirs  
Designated  
Biological Heritage Site**

**Corporation Arms & Stone Reservoir structures  
Designated  
Local Heritage Assets**

**Hillside School (woodland)  
Designated  
Biological Heritage Site**

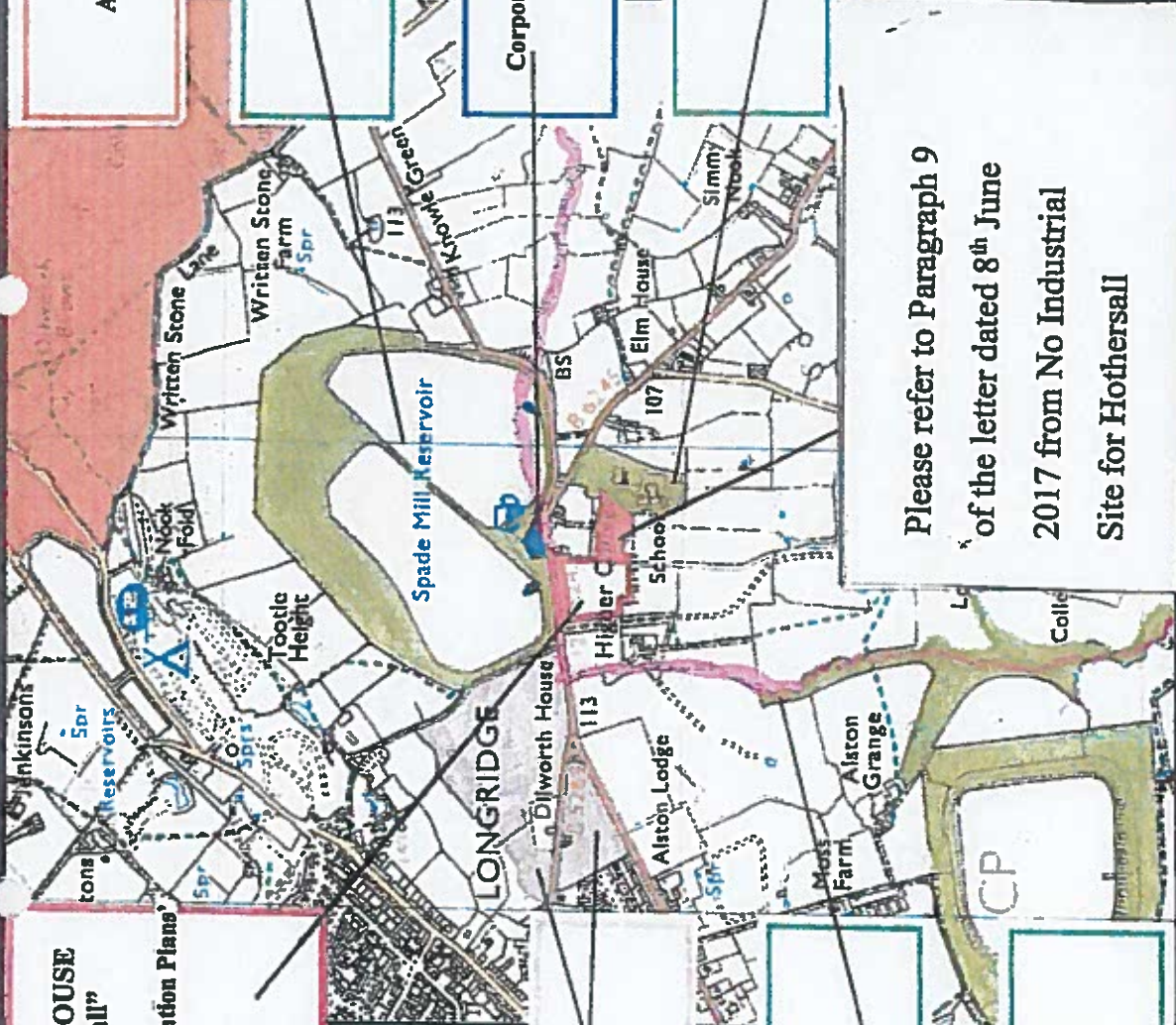
**Local Heritage Assets  
and  
Biological Heritage Sites**

**Please refer to Paragraph 9  
of the letter dated 8<sup>th</sup> June  
2017 from No Industrial  
Site for Hothersall**

**Cromwell Fields  
Tootle Green  
(New Housing Developments)**

**College Wood  
Designated  
Biological Heritage Site**

**Alston Reservoirs  
Designated  
Biological Heritage Site**



All posters, quotes & information have been reproduced in good faith by  
Stephanie Gornall on behalf of Friends of Hothersall' Resident's Action Group.

Department of Health  
1000 North Washington Street  
Washington, D.C. 20001

Department of Health  
1000 North Washington Street  
Washington, D.C. 20001

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1000 North Washington Street  
Washington, D.C. 20001

Longridge  
News

31/5/2017

## Celebrate our vibrant town

I refer to your headline (Longridge News, May 17), Holiday park plan set to boost town's tourist trade, the luxury holiday complex planned extension at Mosses Farm is unique, the sustainable eco-friendly cedar-clad lodges and stone cottages are of low level design and enhance the site location rather than the unsightly disused and derelict farming units they replace.

The Core Strategy (CS) is fully supportive of rural holiday accommodation development: "Sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors... which respect the character of the countryside". (CS) Longridge is currently enjoying a gentle revival of characteristic building re-development, in particular the commendable renovation of the Dog Inn and stylish stone cottages opposite St Lawrence Church.

However, there is a distinct lack of high-end 'tourist accommodation' in the immediate area and this development would fulfil the brief in the Core Strategy - "provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres" (CS)

Walking, horse riding, fishing and cycling are some of the most popular outdoor activities enjoyed by locals, tourists and visitors, which take place in and around the town, boosting trade and creating employment; According to the Longridge Neighbourhood Development Plan: "Promotion of tourism and recreation support employment in the town, including meeting the needs of visitors... appealing open countryside is a great asset to the town". Visitors and tourists, by their very nature, will provide welcome, additional trade to an already thriving economy.

There are a large number of independent shops, cafes, bars and popular restaurants, within a gentle stroll of the holiday lodges.

Let us celebrate our vibrant town, active community

and unspoilt countryside. Longridge Town Councillors, I implore you, give our existing businesses a boost from the increased wealth provided by an enthusiastic endorsement of tourism, welcome all visitors and, in doing so, put a final nail in the coffin of any ludicrous attempts at industrialisation of our green and pleasant land! P.S Ribble Valley planners are in receipt of over 90 letters objecting to the industrial site on Blackburn Road and more are expected before the June 7 deadline.

**Jenny Draper**

On behalf of No Industrial site for Hothersall

Received  
2005  
Nov 12/05

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