

R1. (EAL3 res resp | Addl 5 points)

For official use	Ref. No.
	Ack'd

Ribble Valley Housing and  
Economic Development -  
Development Plan Document  
(HED DPD)



**Regulation 19  
(Publication) comments  
response Form**

Before using this form to make any comments please ensure that you have read the Housing and Economic Development – Development Plan Document and the Guidance Notes, which can be found on Ribble Valley Borough Council's website - [www.ribblevalley.gov.uk](http://www.ribblevalley.gov.uk) and follow the HED DPD.

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Part of document e.g. Housing allocations, open space policy etc...   
Paragraph No.

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i) Legally compliant  Yes  No  
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Justified  Consistent with national policy   
Effective  Positively prepared

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See inserted plain text page.

Section 3, Employment Land Allocations on Page 14 of the Reg 19 Publication HED DPD states

***"The Council proposes to allocate 4ha of employment land. This results in an overprovision against the identified requirement in the Core Strategy of 1.6ha. In making these allocations the plan addresses the identified requirements of the Core Strategy whilst also ensuring the delivery of necessary employment land to meet requirements for Longridge. Overall, the Council when taking these allocations and existing commitments into account provides through this plan for a choice of sites and locations to accommodate economic growth."***

They do not need an over provision for Longridge. Longridge's needs are excellently met by the major developing industrial zones 10 minutes away by the motorway. These sites are patently 'better options'!

A local Resident performed a survey of available Units in the area a few days ago. There are 10 empty Employment Units in Longridge. Three in Ribchester, three in Mitton & loads more on the A59! Not to mention dozens at M6 J31a.

**This over provision makes a mockery of the Core Strategy.** There was no suggestion of a need for over provision in the HED DPD Reg 18 document.

**It is not required!**

The Cleggs and Andertons businesses at Higher College Farm, which are currently under investigation by the RVBC Planning Enforcement Officer, are already causing extreme harm to residential amenity of all houses that line routes from the motorway to their site, and to the roads that their 40 ton plus lorries are destroying. Children are being woken early in the morning by their juggernauts thundering past. Longridge's roads are a potholed disgrace. The new surface of Lower Lane which is meant to last over 7 years is being broken up after only 2 years! HGV's and speeding vans going to these businesses are also an extreme danger to children at the many schools they pass.

Note that the diagram of the proposed employment site EAL3 Higher College Farm on Page 17 shows virtually nothing of what is around the site. There are no clues as to its close proximity to a Hillside School for severely autistic children, to the Tootle Green housing site, and to biological and heritage conservation assets.

Policy DMG1 site access considerations are ...

***The proposals should be well related to the existing highway network. It should not generate additional traffic movements of a scale and type likely to cause undue problems or disturbance.***

It patently fails the above!

I believe that a local Planner has written the following about access to the Hurst site ....

***Especially the poor location, almost opposite the Tootle Green access road, close to a bend bad, almost opposite a bridleway, cycleway, footpaths, the poor 'Sight Lines' on either side of Hurst's access, (he doesn't own the hedgerow to the west, so he would be unable to comply with a 60m hedgerow removal). Close to Cleggs access, the Hurst Track is far too narrow for HGV's. HGV & other heavy traffic is already a big problem for development in this location of course so poor infrastructure is very valid.***

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**Q12** Date of completion:     \_ 06 \_ / \_ 06 \_ / \_ \_ 2017 \_ \_

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## Consultation guidance notes

States on Page 1 ...

***"The Council has a duty to co operate on planning matters that cross administrative boundaries and in preparing the HED DPD it needs to work collaboratively with other bodies to ensure that strategic priorities are clearly considered."***

There is no evidence that this has been done. Specifically on ...

1. Housing 1 – Preston has permitted hundreds of additional new houses right beside Longridge for which Longridge is the service centre. These were not offset against the housing allocation for Longridge.
2. Housing 2 – At least one major development has been overwhelmingly refused by the Planning Committee, only to be approved after a bullying letter from the Developer.
3. Employment Land – Preston has excellent employment zones right beside the motorway and 10 minutes from Longridge. The HED DPD takes no account of these, even though Preston has positioned houses beside Longridge. Policy EAL3 – Land at Higher College Farm, will do real harm to Residents in Longridge and Hothersall (See my Objection document - Objection to Reg19 HED DPD EAL3 GD 20170526.docx).
4. Highways – the infrastructure is inadequate for the increased demands.
5. Doctors and Dentists. Thousands of new houses have been permitted with no provision by either authority for basic services. The Clinical Commissioning Body has said that more provision is required. (Ref. Talk to Longridge Town Council).

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**The Sustainability Assessment**

On Page 1, Para 1.2 the document states a basic goal

***“people ....enjoy a better quality of life, without compromising the quality of life for future generations”***

Policy EAL3 – Land at Higher College Farm, and the Tootle Green housing development are completely contrary to this goal. Increased numbers of HGV’s destroying the roads, shaking peoples’ homes and waking them from their sleep is the destruction of quality of life. Superb meadow land has been destroyed by the Tootle Green development (photos can be supplied) and EAL3 will destroy more. The whole character of Longridge, a pleasant environment where people live and can walk their dogs beside open countryside, will be destroyed.

EAL3 - Land at Higher College Farm, is a habitat for Curlews. These are now an endangered species – they are on the RSPB’s RED LIST.

Page 20, Para 4.2 Appraisal of HED DPD Land allocations.

The promotion of Site 10, Land at Higher College Farm, is bogus.

The HED DPD Reg18 document clearly stated that the residual Core strategy requirement for employment land was 2.41 ha and this has now been more than satisfied – at Mellor Brook and Simonstone. Note that this requirement was for the life of the plan. Ie. Up to 2028 !

The inclusion of Land at Higher College Farm has been purely a last minute addition by 2 local Councillors at Longridge, who are both business men and live no-where near the proposed site.

A previous much smaller proposal for rural workshops at this location was comprehensively rejected. Two businesses already located beside the site are operating well beyond planning permissions and are under investigation by the RVBC Planning Enforcement Officer.

Please refer to my Objection Document (Objection to Reg19 HED DPD EAL3 GD 20170526.docx) for a fuller list of problems with this site.

**Page 25, Site 10 (Land at Higher College Farm)**

The statements made on Page 25 about Employment Site 10 are just WRONG!

It is not served by sustainable transport links. The bus service passing it is infrequent.

Here is an up-to-date statement from an LCC Highways Development Control Officer (David Bloomer) relating to the adjacent BKW development proposal .....

.....  
As well as the issues with the site access, the submitted application does little more that advise on the sustainable links to the site with no suggested improvements. Public transport past the site is infrequent and does not offer a viable alternative travel option. The bus stops would need to be relocated and improved. For pedestrians there will inevitably be a need to cross Blackburn Road, no improvements have been suggested.

I would also be concerned about the safety record at the Blackburn Road/ Preston Road/ Lower Road junction ( adj Corporation Arms) There have been a number of recorded injury accidents at this junction which would need to be considered as it is anticipated that the development would increase the number of movements through this junction. Of particular concern would be the safety of cyclists.

.....

There is no mention at all in the Sustainability Assessment of the resultant increase in HGV's and speeding vans which are shattering my sleep and my residential amenity. Cars, vans, lorries and even juggernauts regularly do 50 or 60 mph past my house in the 30 mph zone. Or about the dangerous, narrow, potholed routes passing schools and housing that these HGV's, juggernauts and speeding vans must pass to get to the site.

All of the wording on Pages 25 and 26 is one of the very worst possible examples of antiseptic drivel that I have ever read.

On page 28, Para on Employment Sites 2 and 3

The report states ...

***It is clear that there are more potential options for employment land than is required to meet the remaining requirement of 2.41ha. Based upon the information set out above and to some extent the consultation responses it is considered that these sites do not need to be included as allocations at the Regulation 19 Publication stage.***

This again shows that the requirement was just 2.41 ha. It also refers to consultation responses. Despite the flawed publicity of the Reg18 consultation in Longridge, there was a large negative response to the Option Site 3 at Higher College Farm which is beside this Site 10 proposal. This negative response was completely ignored (See my full objection document - Objection to Reg19 HED DPD EAL3 GD 20170526.docx for details). In fact the above paragraph was probably written before Site 10 was forced in at the last minute by a couple of 'interested' councillors. Note that Site 10 first appeared after the Reg 18 consultation closed.

On page 107, Summary of Regional and Sub-regional plans

Lancashire's local transport plan – Key Objective

The report states as Key Objectives ....

***To create more attractive neighbourhoods by reducing the impact of transport on our quality of life and by improving our public realm***

And

***To make walking and cycling more safe, convenient and attractive***

The Site 10 proposal is an absolute contradiction of these objectives. Instead of having people cycle 15 mins to employment zones by the motorway, the speeding cars, HGV's and vans will kill Cyclists as they drive through Longridge to get to this insanely located industrial Site 10. The quality of life of me and my neighbours will be destroyed entirely. They also pass lots of schools posing a real danger to the children.

Page 171 Appendix C Site Options SA Matrix for Site 10 at Higher College Farm

The scores in this matrix are mainly negative! The 2 positive scores on Economy and Transport are suspect or bogus. On Economy – there is no identified need. There are empty industrial units, office space and land available by the motorway, 10 mins from Longridge, and elsewhere. The 2+'s given to Transport is very questionable. The bus service is useless and will not be improved. HGV's, vans and cars must use terrible routes through Longridge!



Page 251 and pages either side – Developments around Longridge.

The summary for these states ...

**Cumulative Comments: Site is one of 6 sites in Longridge all of which are in relatively close proximity to each other. Cumulatively, the activity generated by these sites will bring about significant negative impacts on local transport routes by increasing the number of private cars on the roads leading to increased traffic congestion on local roads particularly at peak times in and around central Longridge. It is likely that the large size of the developments will cause a cumulative impact on local landscape/ townscape character of Longridge. Green infrastructure and sensitive design measures have been proposed in order to ensure these effects are mitigated against. Cumulatively, it is likely that local emissions to air will increase due to the use of private cars moving in/out of employment and housing developments, increased sustainable transport provisions have been recommended in order to help maintain current air quality standards. Negative cumulative effects may occur on local educational and health care facilities due to increased demand that development of the area will attract. Sustainable transport provisions should be increased to key service areas in order to allow easier access to a GP surgery, primary/ secondary schools and key amenities. Furthermore, consideration should be given to commissioning additional educational facilities in the area and the possibility of a GP surgery in Longridge**

This clearly states that the impact of these developments is very negative! And it makes no mentions of the impact of HGV's and vans passing through Longridge. It clearly states that the council have approved a massive increase in housing with no provision made for healthcare and little for schools. Note that if you have a heart attack now in Longridge, the ambulance could be held up for half an hour in traffic before it gets you to a hospital! And the report makes no mention of the extensive housing developments on the Preston side of the boundary.

Page 357, Objective 8, Economic Inclusion, The SA matrix for Higher College Farm states....

**Site is unlikely to have a discernible effect on access to jobs.**

Page 359, The SA matrix for Higher College Farm states....

**Cumulative Comments: In conjunction with the predetermined committed sites there are a total of 11 proposed allocations in Longridge. Should all 11 sites be taken forward by the council, the activity generated by these sites will bring about significant negative cumulative impacts on local transport routes. The large numbers of residential dwellings and employment floor space proposed will lead to a dramatic increase in the number of private cars on local roads particularly at peak times in and around central Longridge consequently a significant increase traffic congestion is likely to occur. It is probable that the large size of the developments will cause a significant cumulative impact on local landscape/ townscape character of Longridge through substantial mobilisation of greenfield sites. Significant green infrastructure and sensitive design measures have been proposed in order to ensure these effects are prevented or at the very least minimised. Cumulatively, it is likely that local emissions to air will increase due to the increasing use of private cars moving in/out of employment and residential areas. It is recommended that the Council should actively promote sustainable transport wherever possible and seek to increase sustainable transport provisions in order to help maintain or even reduce current air quality levels. Negative cumulative effects are likely to occur on local educational and health care facilities due to the large influx of people development of this area will attract. Consideration should be given to commissioning new educational and healthcare facilities in Longridge and sustainable transport provisions should be increased to key settlements outside of Longridge in order to allow easier access to a GP surgery, primary/ secondary schools and key amenities.**

This is grim! Again, no mention of the HGV's and speeding vans. Again, no mention of even more developments on the Preston side of the boundary.

This information is buried deep within the SA document. These grim findings are not highlighted in any part of the document which is likely to be read!

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If after reading the Guidance Notes you should have any queries in completing the form please telephone 01200 425111.

This form has two parts: -

Part A - Personal Details (you need only complete one copy of Part A)

Part B - Your comment(s) (Please complete a separate Part B for each comment you wish to make.)

All completed comments forms must be received by the Council no later than 5:00pm on Friday 9th June 2017.

Please return paper copies marked 'HED DPD PUBLICATION CONSULTATION' to Council Offices, Church Walk, Clitheroe, BB7 2RA

Part A

Q1 Please can you provide the following information which will assist us in contacting you if we need to discuss any of your comments further.

Name	[Redacted]
Name of Organisation (if you are responding on behalf of an organisation)	[Redacted]
Database Reference number (if you have one)	[Redacted]
Address	[Redacted]
Post Code	[Redacted]
Email Address	[Redacted]
Phone number	[Redacted]

Copies of all comments made in Part B of the form will be put in the public domain and are not confidential, apart from any personal information. All personal information within Parts A and B will only be used by the Council in connection with the Local Development Framework and not for any other purpose and will be held in accordance with the Data Protection Act 1998. The Council will summarise the comments and all representations will be made available to the Planning Inspectorate.

Part B

Please use a separate form for each individual comment.

**Q2** Name / Name of Organisation (if you are responding on behalf of an organisation)

**Q3** To which part of the HED DPD does this comment relate?  
Part of document e.g. Housing allocations, open space policy etc...   
Paragraph No.

**Q4** As a consequence do you consider the HED DPD is:  
Yes No  
i) Legally compliant    
ii) Sound \*

\* The considerations in relation to the HED DPD being sound are explained in the Guidance Notes

**Q5** If you consider the HED DPD is unsound, is this because it is not... (please tick the appropriate box)  
Justified  Consistent with national policy   
Effective  Positively prepared

**Q6** Please give details of why you consider that the HED DPD is not legally compliant or sound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the HED DPD, please also use this box to set out your comments. *Please continue on a separate sheet if required.*

Please see inserted plain text page

## Summary Of Representations (regulation\_17\_consultation\_statementpdf.pdf)

The consultation process was flawed. I have only met one other person who found out about the proposal for Higher College Farm during the consultation, and he also objected.

On receiving the notification email, I downloaded and looked at the Draft Proposals Map. As there was nothing on it affecting Longridge, I relaxed. A couple of weeks later, I decided to check the rest of the long documents and found the proposal for an employment site at Higher College Farm at the end of the Issues and Options document.

I then spoke to 9 neighbours in 7 households. None of them had heard of it and all were opposed and said they would object. I sent 2 people to the Library to view the proposal. The Librarian told them there was nothing like that in the document set. The person minding the document set in the Station Buildings also knew nothing about the proposal.

There were 114 respondents to the consultation process. The Council considered this an encouraging number.

Of these, the majority were from people outside the borough, meaning that around 50 were Local respondents.

Of these, 10 which is 20% of the Local respondents, were from Longridge. As there were no additional housing developments being proposed, these must all have been objections to Higher College Farm. Mainly the people I informed.

This is a large number in the context of this consultation!!!!

However, Page 13, Para 3.18 states ...

***In terms of objections, most of those (of the very small number of reps received relating to employment) were in relation to potential employment allocation site 3, Land at Higher College Farm, Longridge.***

It totally dismisses the substantial numbers of objections!

Para 3.18 also states ...

***The site however did not just attract objection, with the Town Council in particular stating that principle of the land being earmarked for employment/ commercial development in Longridge (subject to all planning considerations) would be acceptable***

This was the view of some Town Councillors who are businessmen with declared commercial interests, and acquaintanceships with other businessmen promoting development sites. The main one publically fears that Longridge could become a dormitory town. A child could refute this.

**Q7** Please set out what change(s) you consider necessary to make the HED DPD legally compliant or sound, having regard to the test you have identified at Q5 above where this relates to soundness.

You will need to say why this change will make the HED DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible. *Please continue on a separate sheet if required.*

To correct the HED DPD,

1. Policy EAL 3 – Land at Higher College Farm , should be removed.
2. If possible, the numbers of new houses planned in the Longridge area, including those on the Preston side of the boundary that will use Longridge as a service centre, should be reduced.
3. There should be actual plans for increased provision of services, not just bland statements that this is desirable.

**Please note:** your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be another opportunity to make further comments based on the original comment made at the publication stage.

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**Q8** If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I do wish to participate at the oral examination



**Q9** If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. *(Please note that the Inspector will determine who participates.) Please continue on a separate sheet if required.*

I have witnessed many times how Objectors' comments are reduced to very short sentences that hardly convey any of the Objectors' meaning. I need to be able to ensure that the Inspector fully understands my points and the deep fears behind them. For a proposal that will destroy my life, I literally won't sleep, I need to have a full chance to give my opinion and feel that we still have some democracy. I need to see that Developers and Councillors who are businessmen who stand to make commercial gain, do not completely override the rights of all the people whose lives will be drastically affected.

**Q10** If you wish to be kept informed as the HED DPD progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the box(es) below.

Submission of the HED DPD to the Secretary of State for independent Examination


The publication of the Inspector's report following the Examination

The formal adoption of the HED DPD

**Q11** If you have any other comments to make on the HED DPD that have not been covered elsewhere, please use the box below. *Please continue on a separate sheet if required.*

**Q12** Date of completion:    \_ 06 \_ / \_ 06 \_ / \_ \_ 2017 \_ \_

**Q13** Signature



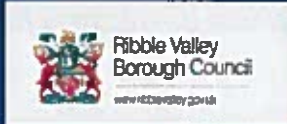
Thank you very much for taking the time to complete this comments form, your comments are very much appreciated.

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For official use		Ref. No.
		Ack'd

Ribble Valley Housing and Economic Development – Development Plan Document (HED DPD)



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**Part B**

**Please use a separate form for each individual comment.**

**Q2**

Name / Name of Organisation (if you are responding on behalf of an organisation)

**Q3 To which part of the HED DPD does this comment relate?**

Part of document e.g. Housing allocations, open space policy etc...

Approach to plan preparation

Paragraph No.

See comment page.

**Q4 As a consequence do you consider the HED DPD is:**

- i) Legally compliant
- ii) Sound \*

Yes

No

\* The considerations in relation to the HED DPD being sound are explained in the Guidance Notes

**Q5 If you consider the HED DPD is unsound, is this because it is not... (please tick the appropriate box)**

- Justified
- Effective

- Consistent with national policy
- Positively prepared

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Please see inserted pages of plain text

## **Approach to Plan Preparation (approach\_to\_plan\_preparation\_documentpdf.pdf)**

This document gives detailed histories and assessments for each of the Housing sites (HAL's) and Employment Allocations (EAL's).

On Page 13, Employment Allocations :

This is very thorough ( sarcasm )! The first sentence cannot even get the subject right. It says '4 potential housing allocations', not employment allocations. It has simply been cut and pasted from the housing allocations section.

On Page 20, Policy EAL 3, Land at Higher College Farm ....

The site was not even part of the Reg18 public consultation. It was revealed to 'the public' at the special meeting to approve the HED DPD to move on to Reg19. Strong objections to the immediately adjacent site are not mentioned and were ignored.

In Site Attributes ....

It mentions that the residual requirement is 2.41ha, but omits to mention that this is already satisfied by the other 2 sites.

It fails to mention that this is a green field site and should only be used if there is a major requirement and no better options – none of which apply.

On infrastructure, it fails to mention that a new electrical substation would be required.

It fails to mention that a biological heritage site is very close, reservoirs are very close, and heavy traffic going to the site will have to pass through conservation zones.

Curlews use the area, I hear them every day, and they are now designated as a threatened species.

It fails to mention that the Cleggs business is operating way beyond its planning permission, and Andertons Butchers have no planning permission at all. They are under investigation by the Ribble Valley BC Planning Enforcement Officer! These businesses are doing severe harm to the highways and residential amenity. Their juggernauts and speeding vans are destroying the roads through Longridge, shattering the sleep of people living by the roads, and causing congestion and danger to Pedestrians, Cyclists and cars at the many dangerous junctions, narrow residential roads, and schools that they must pass to get to the site.

Lancashire County Council Highways rejected a much smaller industrial proposal at the site in 2006 and now have grounds for rejecting the current proposal. (See comments from David Bloomer).

The impact of the visual prominence is considered massive by people who live in the area.

Access is subject to ransom strips and hedges that do not belong to the Developer.

The SA assessment states that it will have no discernible impact on employment in Longridge. Longridge has massive employment opportunities 10 mins away by the motorway.

There are currently 10 empty Employment Units in Longridge. Three in Ribchester, three in Mitton & loads more on the A59! Not to mention dozens at M6 J31a.

There will be noise pollution invading the autistic school and nearby homes. The bleep, bleep, bleep of reversing lorries can be heard hundreds of metres away.

On significant issues to be experienced by residents, can they limit use to businesses that do not require earthquaking HGV's and speeding vans?! It is proximity to roads to and from the site that is the killer issue for residents! And HGV's and speeding vans passing schools which will probably be literally a killing issue! Movements



by HGV's in and out of the site would have to be limited to between 08.00 and 18.00 to protect residential amenity. But 08.00 to 09.00 and 15.00 to 16.00 are no good either as there is serious risk to children going in and out of all the schools the traffic must pass.

The Sustainability Appraisal and HRA for the site seems very glib compared to the other 2 sites. Has it actually been performed? Eg. The included SA table has ...

Housing – No Impact

Landscape and Townscape – No impact

But the Site Attributes clearly show that there are impacts.

Transport – double positive

Is an insult!

The SA Non Technical Summary statements included are spurious.

Eg. The site is NOT served by sustainable transport links. The bus service is infrequent and inadequate and was very nearly terminated altogether in the last round of Council cuts. They plan for users to come by car.

Again, there is no mention of Juggernauts, HGV's, speeding vans and the harm they cause to the unfit residential routes through Longridge.

On Page 22. The Consultation Response is a complete misrepresentation!

It states ..

***As this site was submitted as part of the 'call for site' exercise, no consultation responses have been received at Regulation 18 specifically relating to this land.***

It fails to mention that this site is immediately adjacent to a site that was consulted on and objected to. That adjacent site has put forward a planning application that has spurred an Action Group and received over 100 letters of objection! Most of these objections fully apply to this 'new' site and to any site near Higher College Farm.

As such, the 'Approach To Plan Preparation' and the Reg 19 proposals are neither Positively prepared, Justified, or Effective.

EAL3 - Land at Higher College Farm, should be removed from the HED DPD.

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