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The Planning Inspectorate
HED DPD Reg 19 Publication Consultation
Forward Planning
Regeneration and Housing
Ribble Valley Council Offices
Church Walk
Clitheroe
BB7 2RA

Dear Sirs,

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

I have been asked to write on behalf of Hothersall Parish Council to express our concern over emerging proposals for employment land allocation at Higher College Farm.

The Council is in receipt of the Regulation 19 Housing and Economic Development DPD dated April 2017 which includes at Policy EAL3 the proposed allocation of 1.5 hectares of land for employment purposes within the parish. We note that this proposed allocation forms part of an overall allocation of 4.0 hectares of employment land to meet an identified need of 2.41 hectares set out in the Core Strategy.

The Council has a series of concerns in relation to this proposed allocation; these are set in detail below and include:

- the borough wide need for employment land;
- the evidential basis for the proposed allocation;
- the proposal to allocate more than the identified need;
- the need for an allocation to provide additional land at Longridge;
- the choice of land to the east of Longridge;
- the character of the proposed site;
- issues relating to the deliverability of the proposed site.

Whilst we recognise the intent as set out in the Core Strategy to provide additional employment

land relating to Longridge we do not see that the case can be made for an allocation, and especially for an allocation in this location. Our view is that provision can be made for additional employment within and relating to Longridge during the plan period via windfall and that an allocation is unnecessary.

We are also concerned that there are a series of unanswered questions relating to the deliverability of the proposed site which have not been fully addressed. On that basis, the proposed allocation does not, in our view, appear to meet the tests of Soundness set out in the NPPF.

- It is not positively prepared, in that it will not be consistent with achieving sustainable development.
- It is not justified; there is no evidenced or pressing need for an employment allocation in open countryside to the east of Longridge.
- There is no evidence that the proposed allocation will be effective; its deliverability has not been proven, there are questions relating to viability and no certainty around either its availability or the attraction of this site to the market.
- There is no certainty that the proposed allocation can be developed in a way which is consistent with national policy; there are extant issues relating to highway safety, environmental impact and residential amenity.

Borough wide Need for Employment Land

We note that the need has been determined at 2.41 hectares. We are aware that planning consent has recently been granted to Daniel Thwaite & Co. for a new HQ building on 1.70 hectares of land at Sykes Holt near Mellor [Site Option 1]. This consent materially reduces the area of additional land still required over the plan period [to 0.61 hectares].

The evidential basis for the proposed allocation

This determination is based on evidence produced to support the Core Strategy, specifically an Employment Land Study dated 2008 and a refresh in 2013. This evidence is now out of date and cannot be relied upon to provide a clear picture of employment need relating to Longridge in 2017 and beyond.

The ELR refresh makes it clear that the views around the need for additional employment land have come from Longridge Town Council rather than from empirical evidence [see paragraph 7.73]. The consultants have reported this view but not commented upon its validity. Whilst they do make recommendations around provision of housing land at Longridge these do not appear to be based on evidence relating to demand but rather a policy based approach that new housing should mean new employment land. No analysis is offered as to whether, or if not why not, the large areas of employment land available close to Longridge at Grimsargh and Preston cannot meet additional employment needs associated with housing growth at Longridge.

In our view this is unsatisfactory and means that the proposal cannot be considered to be justified.

Need for Employment Land at Longridge

We are aware that the Borough Council believes that housing growth in Longridge suggests that the provision of additional employment land in or associated with the town would be beneficial. It is important to note however that much of this housing growth has occurred on land within the Preston City Council area where significant additional employment land is available. New employment provision in the Preston City Council area includes significant developments at Grimsargh which are in close proximity to and readily accessible via sustainable transport from Longridge.

The proposal to allocate more than the identified need

The proposed allocation quite clearly provides for a larger area of land than is identified as being necessary within the Core Strategy. There is no justification for this over provision within the aged evidence base or from more recent research or activity. The Regulation 19 HED DPD is entirely silent on the matter and is not supported by any new or updated analysis or assessment of demand for, or take up of, employment land.

It is our view that there is no need for an allocation to enable the delivery of additional employment land at Longridge. It is perfectly possible for additional land to come forward via application during the plan period as demand dictates.

The need for an allocation to provide additional land at Longridge

No evidence is put forward associated with the challenges or constraints faced by businesses in the Longridge area due to a lack of land upon which to expand. In fact, the opposite must be true as RVBC and Preston CC have allowed several existing employment sites within the urban area of Longridge to be developed for housing.

There is no evidence based justification or rationale for over provision of allocated employment land, and certainly not at Longridge.

The choice of land to the east of Longridge

The choice of land to the east of Longridge is bizarre. It is no accident that all the existing employment areas related to the town are within or adjacent to the urban area to the west or north of the town. This is logical; these sites are far better connected to the main routes to the motorway and the main urban area to the west.

The choice of land in the open countryside is also bizarre. The 2013 report makes it clear that other sites were considered as suitable that are far better related to the urban area and existing employment zones of Longridge [see paragraph 7.73], yet none of these have come forward. This suggests that there is no demand for such provision.

There are infrastructure constraints to the east, not least the length restriction on the bridge at Ribchester, which means that HGV's cannot transit to the A59 or Blackburn along the direct route [or desire line].

The 2013 Employment Land update commented on land at Higher College Farm that traffic from the site does not have to transit through the centre of Longridge. This may be true, but only to a point. Traffic from the south will still have to pass along Lower Lane, through the residential area to either side, pass the constrained road network at Chapel Hill, and through the drop off and pick up area of St Cecilia's High School. Further, traffic from the north including HGVs and other large vehicles leaving the M6 at Junction 32 will, by sat-nav direction, be brought through the town centre as it is the most direct route to Higher College Farm.

There are environmental constraints to the east, particularly the Forest of Bowland AONB which is situated close to the proposed allocation and includes land, and public rights of way, that overlook the site [from distant views].

The character of the proposed site

The site is inappropriately described in the 2013 Employment Land Study. It is not on the edge of Longridge, but is a green field site in open countryside some distance from the urban boundary.

Whilst there is a certain amount of employment activity at Higher College Farm, this is contained within the built environment of the former farm site. The site is not within or adjacent to the urban boundary of Longridge. The eastern extension arising from the Tootle Green development was not planned for and was not anticipated when either of the Employment Study reports were undertaken.

Far from having the characteristics of an employment site, the land is amenity land associated with the main farm house at Higher College Farm. If it has any character other than farm land, it is residential, not commercial.

It is the Council's view that there are clear environmental constraints associated with the site that do not seem to have been considered.

Development for employment use on this site would have a harmful impact on:

- the designated Biological Heritage sites at Hillside School woodland and Spade Mill Reservoir;
- the setting of the Corporation Arms identified as a Local Designated Heritage asset in the [draft] Longridge Neighbourhood Plan [Policy LNDP7]; and,
- the experience of users of the public right of way that runs south from Blackburn Road on the eastern boundary of the proposed site and then continues south towards Alston Grange.

Issues relating to the deliverability of the proposed site.

We have not seen any evidence or technical information to demonstrate that the site is deliverable. It is our view that no allocation should be made without such evidence, and that such evidence should be available in the public domain for scrutiny.

There is no evidence to show that the site can be satisfactorily accessed, at least none that the

Parish Council is aware of. Where is access to the site to be provided? What relationship will the access have to the existing access to Higher College Farm or to Tootle Green? Does the promoter have access to the land needed to secure visibility splays? No information is put forward within the DPD to demonstrate that the site can be accessed.

The Parish Council would draw attention to the frequency with which this part of the road is flooded. It is low lying, slow to drain and, in periods of heavy rain, can be hazardous to navigate. We would also draw attention to the potentially dangerous manoeuvre of HGVs and other large vehicles already exiting from Tootle Green and the Clegg/Anderton access road. Vehicles frequently cross both lanes of the carriageway when turning out onto the B road, the same road which would have to take any additional traffic were this site to be developed.

In our view, and for all of these reasons, this makes the proposed allocation unsound.

The proposed allocation is for B1, B2 and B8 uses. It is our view that this range of uses is completely inappropriate to the location, not least as they would generate significant movements of heavy vehicles in what is currently a residential and rural setting. These vehicles would need to travel down Lower Lane, arguably Longridge's premier residential street, to access the motorway or the north-east Preston industrial areas. En route heavy vehicles would pass directly in front of the St Lawrence's Church and, via the narrow road at Chapel Hill, straight through the drop off and pick up area for St Cecilia's School.

In addition, we are concerned that the traffic generated by the proposal will create issues on what is already a dangerous stretch of road between Dilworth House and the Corporation Arms. It is important to note that these concerns have also been raised by Lancashire County Highways team in their response to the application for employment use on land to the east of Higher College Farm [3/2017/0317]. We would draw the inspectors' attention to the comments on public transport in the same report. Unlike the 10 minute frequency of the bus service to the west of Longridge, the service to the east, passing Higher College Farm, has a 2 hourly frequency.

Taking these matters into account you will, we hope, agree that the site promoted by M Hurst should not be allocated for employment [or indeed any] development. Please note that we have provided copies of this letter to our RVBC ward councillors.

Finally, we would like to make the point that we would have welcomed the opportunity to discuss our response with the Member of Parliament for our constituency but the timing of the General Election has denied us this. We ask that you ensure that the consultation period is extended to allow our newly elected MP to make his views clear; to fail to do so would, in our view, be an abuse of process.

I would be grateful if you could please acknowledge receipt and provide a reply with comments in due course.



Clerk to the Hothersall Parish Council

Cc: Cllr David Smith & Cllr Jim Rogerson

