



Professional Planning and Development
Member of the Royal Town Planning
Institute



Planning Representation made by
Barrowford Parish Council
to planning application reference 22/0197/FUL
79 dwellings at Church St, Barrowford



May 2022

1. Purpose and scope

1.1 Fitzgerald Planning & Design have been commissioned by Barrowford Parish Council to undertake an independent review and form representations to planning application 22/0197/FUL which has been submitted by Beck Homes for the erection of 79 new dwellings on land off Church St, Barrowford.

1.2 The review will focus on the following:

- Policy Context (local and national)
- Principle of the development

Other material planning considerations

- Design and layout
- Highways and parking
- Trees and ecology
- Landscape impact
- Social Infrastructure
- Affordable housing
- Drainage

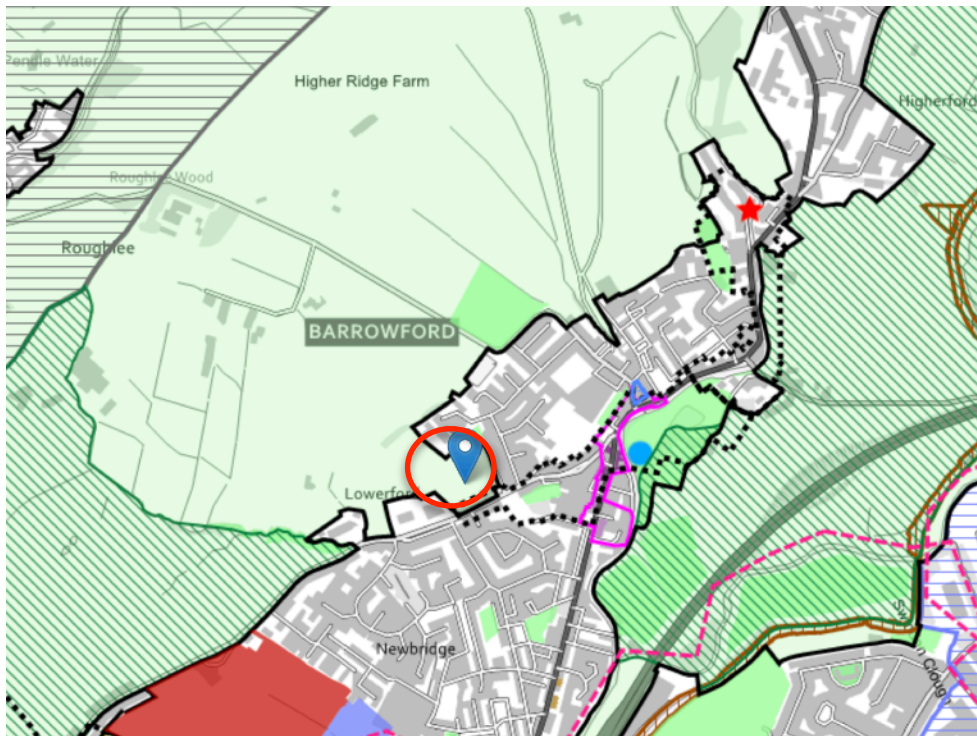
2.0 Grounds of objection

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the adopted development plan, unless material considerations indicate otherwise. These requirements are repeated within the National Planning Policy Framework (NPPF 2021) which sets out the Government's planning policies and details how they should be applied.

The Parish Council's objections relate to both the principle of development and a number of associated material considerations, which will be outlined and expanded upon in this response.

3.1 Local policies

The adopted development plan in question is the Pendle Local Plan Part 1: Core Strategy ('the Core Strategy') and the relevant policies of the Barrowford Neighbourhood Plan. Pendle Council's proposals map (as replicated in the Neighbourhood Plan map) confirms that the application site lies beyond the defined settlement boundary for Barrowford, within the Open Countryside and in close proximity to the boundary of the Forest of Bowland AONB which lies to the north (see Local Plan proposals map excerpt below).



Extract of the Proposals map showing the location of the site

Pendle Part 2 Update - Site Allocations and Development Management Policies

The Borough Council were in the process of preparing Part 2 of the Local Plan ('Site Allocations and Development Management Policies') which would expand on the Part 1: Core Strategy, allocating land for future development and providing an updated suite of policies to reflect the Council's strategic vision.

However, at the Full Council meeting on the 9th December 2021, the Council decided not to proceed with the submission of the Pendle Local Plan Part 2. This was because of concerns that it did not reflect the impact from Brexit and the ongoing COVID-19 pandemic on businesses, future economic growth and housing need in the borough. The Council are now reviewing the Core Strategy, adopted in 2015 and where necessary new evidence base documents will be prepared. Details of the review process and projected timetable will be made available in a future update of the Council's Local Development Scheme (LDS).

Accordingly, in line with paragraph 48 of the National Planning Policy Framework and the stage of preparation of the emerging Part 2 Plan, it cannot be afforded significant weight in the assessment of this application. Therefore the policies listed below, as contained within the Core Strategy, Barrowford Neighbourhood Plan and the Framework are relevant.

It should also be noted that owing to its age, the Council undertook a review of the Core Strategy in December 2020 to test the relevance and consistency of its policies with those of the Framework. The Review found that the majority of its policies remained consistent with the Framework but highlighted areas where any lack of conformity arises. This will be discussed against the relevant policies below.

3.2 Local Plan Part 2 site selection and assessment

It is noted that in the withdrawn Part 2 document Dec 2021, Oaklands was put forward as a Reserved Site for 60 units. Reserved sites will only be engaged should they be required to meet under-delivery or to address as yet unforeseen future need during the life of the Plan.

Policy LIV8				
Reserve Sites for Housing				
1. The boundary of each Reserve Site is defined on the Policies Map.				
2. The following Reserve Sites may be developed for housing should they be needed to address under-delivery, or to meet future development needs (i.e. beyond the end of the plan period).				
Ref	Site Name and Location	PDL ¹	Site Area (ha)	Dwellings
P105	Halifax Road, Nelson	No	6.56	75
P104	Oaklands, Barrowford	No	3.20	60
P238	Gib Hill (Site B), Nelson/Colne	No	12.32	75
P263/P265	Stoney Bank Road, Earby	No	6.83	100
¹ Previously Developed Land		Totals:	28.91	310

Within the site criteria for the P104 the Council note the following;

'The housing needs of Barrowford for the remaining plan period to 2030 are largely fulfilled by committed developments (most significantly at Trough Laithe). As such, there has been no need to identify any land as an allocation for housing within or at the settlement at this point in time.'

3.3 Pendle Local Plan Part 1: Core Strategy

- **Policy SDP1** outlines the Council's approach to sustainable development. The policy reflects the position of the Framework, insofar as the Council will seek to support new development unless the adverse impacts arising from the grant of planning permission would significantly and demonstrably outweigh its benefits;
- **Policy SDP2** sets out the Council's spatial development strategy and the hierarchy of settlements. Barrowford is defined as a 'Local Service Centre', a role which supports the larger 'Key Service Centres' and is intended to accommodate a scale of development which is to "serve a localised catchment". The policy also states that "where Greenfield land is required for new development, such sites should be in a sustainable location and well related to an existing settlement".
- **Policy ENV1** seeks to protect the Borough's natural and historic environments, including its biodiversity and landscape character. In areas not subject to national landscape designations (such as the application site) development should aim to safeguard or enhance the character of the area. Due consideration should be given to the Lancashire Landscape Assessment, with proposals demonstrating how they respond to the particular landscape character type they are located within;

- **Policy ENV2** seeks to deliver the highest possible standards of design, with schemes that are practical and legible, attractive to look at, and seek to inspire and excite. Proposals should contribute to the sense of place and make a positive contribution to the historic environment and local identity and character;
- **Policy ENV4** promotes sustainable modes of travel. Proposals for new development should have regard to the potential impacts they may cause to the highways network, particularly in terms of safety and the potential to restrict free flowing traffic, causing congestion. Where an adverse impact is identified, applicants should ensure adequate cost effective mitigation measures can be put in place. Where the residual cumulative impacts of the development are severe, planning permission should be refused;
- **Policy ENV7** requires new development to consider flooding and the risk the proposed development may pose to areas downslope/downstream;
- **Policy LIV1** relates to housing need and distribution, but was found to be out of date in the Core Strategy Review as it is based on an assessment of housing need which is no longer consistent with the Framework. It will, however, remain part of the development plan and be a material consideration until it is replaced in the Part 2 document. Aside from setting out housing targets, the policy also states that until Part 2 of the Plan is adopted, sites outside of but close to a settlement boundary will be considered for housing. Such proposals are expected to follow the spatial principles set out in Policy SDP2;
- **Policy LIV3** outlines the type of homes required in Pendle and required new development to have particular regard to the requirements of policies LIV4 and 5;
- **Policy LIV4** relates to the requirement for affordable housing within the Borough, but was found to be out of date in the Core Strategy Review due to certain definitions and thresholds. Need has also shifted since the CS was adopted, as evidenced in the 2020 Housing Needs Assessment;
- **Policy LIV5** seeks to deliver better places to live and to diversify the current housing stock in the Borough. Future housing schemes should deliver the following mix of property types to address need – 25% detached; 35% semi-detached; 10% terraced houses; 10% flats and 20% bungalows/elderly housing.
- **Policy SUP2** supports the delivery of new infrastructure which improves the health and wellbeing of residents.
- **Policy SUP3** advises that the Council will support the provision and improvement of new educational facilities where need exists.

3.4 Barrowford Neighbourhood Plan

The Barrowford Neighbourhood Plan was made in November 2019 and is part of the statutory development plan. As a result its policies should be given due weight in the determination of any planning application within the Plan area.

The following policies are relevant to this scheme:

- **Policy BNDP01** states that new housing developments will be considered where they align with the relevant policies of the Core Strategy (including ENV1 and LIV5); enhance the landscape setting of the Parish and are appropriate to the surrounding local context in terms of size, scale, design and character;
- **Policy BNDP08** seeks to protect important local views and vistas. Locally important views should be protected from development that is intrusive and detrimental to the landscape character. Any new development should not be of a scale, height and form which is discordant and disrupts the immediate surroundings and views.

3.5 National policies

The National Planning Policy Framework (2021) ('the Framework') sets out the Government's planning policies for England and how they should be applied. It requires local planning authorities to apply a presumption in favour of sustainable development which means, as paragraph 11c explains, that development which accords with an up to date development plan should be approved without delay.

Relevant paragraphs within the Framework include:

- **Paragraph 7** - The purpose of the planning system is to contribute to the achievement of sustainable development;
- **Paragraph 11** - The presumption in favour of sustainable development lies at the heart of the Framework. For decision-taking this means approving development where it accords with an up-to-date development plan, or where there are no relevant development plan policies or where the policies which are most important for determining the application are out-of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate development should be restricted;
- **Paragraph 62** - The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent and people wishing to commission or build their own homes);
- **Paragraph 119** - Planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land;
- **Paragraph 124** - Development should make efficient use of land taking into account the need for different types of housing and other development and the availability of suitable land; market conditions and viability; availability and capacity of infrastructure; the scope to promote sustainable travel; the desirability to maintain the character and setting of an area or promote regeneration; and the importance of creating well-designed, attractive, healthy and safe places;
- **Paragraph 126** - The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- **Paragraph 130** – Development should function well and add to the overall quality of the area; be visually and architecturally attractive and be sympathetic to local character and history, including the surrounding built environment and landscape setting.

4.0 Principle of development

Whilst Barrowford is identified as a 'Local Service Centre' in the spatial hierarchy as set out in Policy SDP2, it is the smallest settlement within the M65 corridor and is expected to play a supporting role to the larger towns of Nelson and Colne. Accordingly the level of development it is intended to accommodate should be proportionate to this role, taking into account its scale, infrastructure and landscape considerations.

Barrowford already accommodates the Borough's strategic housing site at Trough Laithe, which is expected to deliver in the region of 500 dwellings. To locate another scheme of over 79 dwellings to the north of the settlement would represent a degree of expansion which is disproportionate to the role of the settlement and would undermine the Council's spatial strategy.

Pendle Local Plan Part 2 : Revised distribution of new housing

Whilst the Local Plan part 2 is no longer moving forward, the following table produced as part of the evidence base can still be used as guide. The table clearly shows that Barrowford has a requirement of 30 units to assist in the housing distribution 2014 - 2030.

Revised distribution of new housing in Pendle 2014-2030

Housing Requirement 2011-2030 (Core Strategy)		5,662	Source: Pendle Core Strategy (December 2015)									
Core Strategy Adopted Requirement Per Year		298	Source: Pendle Core Strategy (December 2015)									
LPP2 Evidenced Housing Requirement		240	Source: Standard Method (August 2020) and Pendle Housing Needs Assessment (March 2020)									
Small Site Allowance		245	35 dwellings per year over 7 years (from 2022/23)									
Reoccupation of Long Term Empty Homes		194	As reoccupied 2014/15 to 2018/19									
Adjusted Housing Requirement 2014-2030		3,691	This figure is reflected in Column A below (see note on calculation)									

Spatial Area	Settlement	A	B	C							Total	D	E	F	G	H	
				2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21							
M65 Corridor	Nelson		904	18	9	48	10	67	30	49	231	673	331	213	129	335	
	Brierfield	2,584	517	3	7	14	7	45	34	78	188	329	116	50	163		
	Colne		904	24	28	28	68	88	90	138	464	440	340	88	12		
	Barrowford		258	15	6	2	3	9	10	12	57	201	22	149	30		
West Craven Towns	Barnoldswick		664	399	11	66	20	2	27	24	32	182	217	111	0	106	252
Earby	264	2	3	2	2	32	9	2	52	214	67			147			
Fence	66	3	0	13	18	3	0	1	38	28	2			26			
Foulridge	66	2	2	2	0	20	6	5	37	29	8			21			
Kelbrook	66	0	0	0	2	0	0	8	10	56	5			51			
Trawden	66	5	2	1	6	9	4	4	31	35	66			-31			
Barley	13	0	1	7	0	0	0	0	8	5	7			-2			
Blacko	27	0	0	0	0	0	0	2	2	25	13			12			
Higham	27	0	1	0	2	0	1	2	6	21	0			21			
Laneshaw	35	0	0	0	2	0	0	0	3	5	30	14		16			
Rural Pendle	Bridge	443														49	
Newchurch and Spen Brook	13		0	0	0	0	0	0	4	4	9	31			-22		
Roughlee and Crow Trees	13		0	2	0	0	1	0	0	3	10	7			3		
Salterforth	35		0	1	31	17	9	0	1	59	-24	37			-61		
Sough	13		0	0	0	0	0	0	1	1	12	0			12		
		3,691	3,691	83	128	168	139	310	208	342	1,378	2,313	1,177	500	636	636	

Column	Explanation
A	Spatial Area requirement less long term empty homes (2014/15 to 2018/19; 194 dwellings) and Small sites allowance (245 dwellings)
B	Indicative settlement specific requirement based on column A
C	Net completions 2014/15 to 2020/21
D	Settlement specific residual less net completions (B-C)
E	Commitments per settlement (Net)
F	Trough Laithe Strategic Site distribution (M65 Corridor only)
G	Indicative settlement specific residual need less completions and commitments (B-C-E-F)
H	Spatial Area residual need less completions and commitments (A-C-E-F)

Extract taken from page 221 of the Site allocation and Development Management Policies Preferred Option Report December 2021

It is clear from the above table and the lack of any intended allocations within or at the edge of Barrowford, that the level of development proposed in the application does not form part of the strategic rebalancing envisioned by the Council and would have numerous adverse impacts which will be considered later in this objection, including landscape, impact on the highway and impact on the adjacent Conservation Area.

Accounting for the recent decisions of the Council with regard to the direction of the Part 2 document, it appears likely that the scope and amount of housing sites to be allocated within Pendle will be reduced to reflect the lower annual figure resolved at the Full Council meeting in December 2021. Accordingly, it is highly unlikely that Barrowford would be the target of significant growth as a result of any such review.

Policy LIV1 supports housing development which follows the spatial strategy laid out in Policy SDP2 and until Part 2 of the Plan is adopted, sites outside of but close to settlements will be considered. However, this approach is predicated on such sites being sustainable and appropriate in terms of their scale, nature and proximity to the relevant settlement.

In addition to the impact on the spatial role of Barrowford and housing distribution as a whole, the proposed scheme at Church Street, whilst on a smaller scale to the other major housing scheme on Pasture Lane, is considered by the Parish Council to be an anomalous projection into the open countryside.

Accordingly, the principle of development at this site presents conflicts with Policies SDP2, ENV1 and ENV2 of the Core Strategy; Policies BNDP01 and BNDP08 of the Neighbourhood Plan and the requirements of the Framework to create high quality, beautiful places which make effective use of land whilst safeguarding and improving the environment.

Additionally there appears to be conflict with Policy LIV5, which outlines the balance of dwellings to be delivered in new development, by type. The development contains no bungalows or dwellings for older people, with LIV5 requiring at least 20% of new schemes to deliver such provision. There is a demonstrable national requirement for adaptable housing due to the ageing population of the country and as such any major development would be expected to assist in addressing this shortfall.

In light of all these factors, the principle of housing in this location is unacceptable and does not represent sustainable development.

5.0 Other material considerations

5.1 Design and Layout

The proposed layout offers little in terms of integration with Barrowford and the wider area and subsequently presents itself as an overly dominant sprawl into the open countryside.



The proposed design is formulaic as a result and does little to reflect its surroundings.

There has been an attempt to push the development back off Church Street and retaining trees along the main frontage (note that the submission refers to the loss of 1 tree along the frontage)

The number of units is 79 whereas the requirement set out in the withdrawn Part 2 was only 60 units.

The Framework is clear in that design is a key component of sustainable development and seeks to create '*beautiful places*' (para 126). Church Street frontage will be the main entrance into the site and the established stone wall and trees line boundary will alter as a result.



The site has a clear gradient change from the north down to Church Street to the south. Whilst a set back from Church Street has been provided, when viewed from the road there will be a clear intrusion into the open countryside.



Photos: Frontage along Church Street

5.2 Impact on the Barrowford Conservation Area

The Conservation area projects into the field for the purpose of protecting both the Lodge and the length of original boundary wall to the former Oaklands House Estate. This wall is part of the defining character of the streetscape along Church Street and adds to the Character and setting of important buildings including Oaklands Lodge, Higher Causeway Farm and Barn, the ruin of the original St. Thomas Church and the former Church School.

During the early 1970's a breach was inserted into the wall to form access to Lupton Drive this destruction probably resulted in the remainder being included in the Conservation Area. The proposed insertion of an entrance into this wall and reduction in height to improve the visibility splay will markedly affect the setting, character and amenity of Oaklands Lodge, Higher Causeway Farm and Barn. The proposed development would destroy the current green field setting of both this part of the Conservation Area and the setting of Oaklands House, one of the few large Victorian mill owners houses within Barrowford.

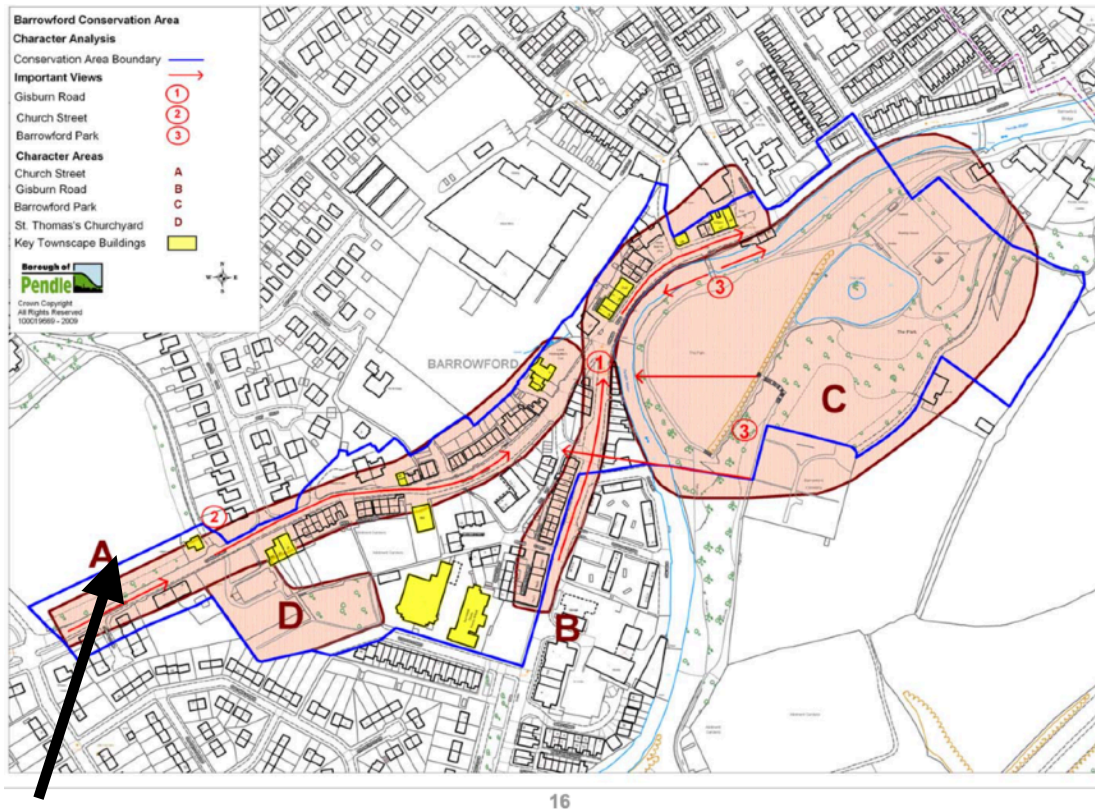
Part of the proposed site's red edge falls within the defined Barrowford Conservation Area (see extract below). The section falls within the Church Street character area.

'Church Street is part of the early infrastructure of the village, winding gently from its elevated position down to the junction with Gisburn Road.....The street still bears evidence of earlier farming activity in the former farmhouses and barns at Higher Causeway and Oaklands Home Farm, as well as the ancient Bank Hall. As the village grew in size, the parish church, chapels and school were also located here. The area still retains a picturesque, quieter and semi-rural feel, elevated away from the busier commercial and industrial village centre on the valley floor.'

'The other buildings on Church Street are in the most part a mixture of two and three storey cottages, the varying heights of which add interest to the street scene. The building forms are varied due to the mixture of building types, with further variation in the building lines and juxtaposition to the road. The predominant materials are local stone which is used both for walling and roofing, and for

footpaths, passages between buildings and steps. This consistency in building materials brings unity to the street and contributes to its special identity, which is very much in the local vernacular. Mature trees rising above the walls and buildings reinforce this sense of place. ‘

Extracts page 20 of the CA Character Appraisal



Extract page 16 of the Conservation Area Appraisal

The CACA identifies buildings which are Listed, those which make a special contribution and those which make a positive contribution. Although not Listed, Oaklands Lodge and Higher Causeway Farm and Barn are identified as buildings which makes a special contribution to the character and appearance of the Conservation Area.

Buildings which make a special contribution

Oaklands Lodge

Boundary wall along the north side of Church St

Higher Causeway Farm and Barn (which would be directly opposite the proposed new entrance to the site)

The applicant's own Heritage Statement confirms on page 6 that;

'The significance of this part of the boundary wall is primarily conferred by the sense of division it provides, in conjunction with the band of trees behind it. It serves visually to enclose the road, and from the west (the key view noted in the conservation area character appraisal), it funnels the eye down towards the village centre.'

It would appear that attention has been placed on the design and detail of the proposed new opening and the reduction in the wall height to allow visibility onto Church Street. The Heritage Statement also refers to the design of the units fronting Church Street being of simple design, with stone and slate so not to detract from the prominence of Oaklands Lodge. Whilst 'less than substantial harm' is concluded in the supporting Heritage Statement, the Parish Council does not consider that the public benefit outweighs the harm, on a Greenfield site within Barrowford in which there are other preferred housing sites in less sensitive locations.

5.3 Highways

Historical description: Church Street and Wheatley Lane Road are vestiges of a pre-medieval route from Colne to Whalley. Before the Marsden to Gisburn Turnpike was built this led directly to a ford situated at the bottom of Church Street for the route to Colne, and the routes to Gisburn and Marsden following the river. The existence of numerous 16th, 17th and 18th Century Buildings to the front of the site and the lower environs of Church Street meant that width was restricted to horses and carts.

The widening of Wheatley Lane Road was possible due to its route through open Countryside, but unfortunately the route through the built up area of Church Street could not be widened with the resulting emphasis being on vehicle access with scant pedestrian footway provision.

Barrowford Parish Council have major concerns over the creation of the new access onto Church Street.

- Sight lines to the entrance of the proposed development are very restricted by the lack of footpath to the carriageway on the site side of the road and the narrow footpath in front of Higher Causeway Farm and Barn opposite.
- The close proximity to the private access road to Oaklands Lodge, House and converted dwellings in former out buildings could decrease sight lines as could the access to St. Thomas's Church car park. Access from Lupton Drive onto Church Street was recently submitted as part of an alternative route to serve the planning application for 200 dwellings proposed off Pasture Lane (21/0949/FUL) and would include a roundabout at this point.
- Church Street currently experiences large volumes of cars being part of the school run for both St Thomas School and Rushton Street Primary School. In recent years has become a rat run to circumvent large volumes of traffic along Gisburn Road through to Junction 13 of the M65.

- The road has several pinch points exacerbated by on street parking reducing the width of the carriageway to single file traffic and prohibits larger buses and HGV's. This is most prevalent in the section from Oaklands Lodge to the junction with Gisburn Road.
- The access and egress from the St Thomas side of the site would consist of traffic using Higher Causeway to the junction with Gisburn Road, or Nora Street to the junction with Gisburn Road at Newbridge, or proceeding up Wheatley Lane Road.
- Access via Higher Causeway is problematic as on street parking to both sides reduces the width of the available carriageway to single file. Higher Causeway is also the main access to St Thomas School and a secondary route to Rushton Street School each predominantly going in the opposite direction to the other. Nora Street also is an integral part of the School Run to both schools and again on road parking to both sides severely reduces the available width of the carriageway.
- Wheatley Lane Road leads to Carr Hall Road, the only suitable access to the wider area not through Barrowford village centre. The junction at the top of Carr Hall Road is narrow with very poor sight lines and the Carr Hall Road junction with the A6068 Villages By pass is notorious for the number of collisions that have taken place there in recent years.

It is noted in the supporting Transport Statement that formal pre-app was carried out with LCC and the developer in 2020. Whilst there was no formal objection at the time, a lot of detailed information was required, most importantly the visibility of the new junction on Church Street, as commented below;

'The speed data collected during the week commencing 9th March 2020 records 85%ile speeds at 30mph WB and 32mph EB with visibility splays at the site access X-2.4m by Y-40 and 44m).

There is a high retaining wall and mature trees within the visibility splays within the development site. Details of how these will be altered/lowered or removed should be submitted.'

The applicant acknowledges that in order to achieve the correct visibility splays for the new entrance a large section of the wall is to be reduced in height. The Parish Council argues that this dilutes the importance of the wall and its contribution to the character of this part of the Conservation Area.

5.4 Trees and Ecology



Trees at Oaklands mark the entrance to the Conservation Area on Wheatley Lane Road.

The trees which form the southern edge of the site with Church Street are fundamental to the character of this part of the Conservation Area as set out below;

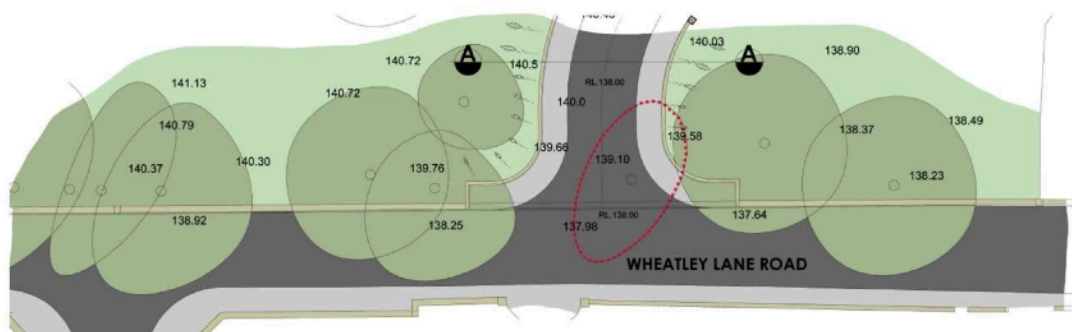
‘When approaching Barrowford from the south west on Wheatley Lane Road another gateway to the Conservation Area is formed by the line of mature trees in the field to the north at Oaklands opposite Lonsdale Gardens. The route is strongly defined by the field boundary stone wall with the trees behind growing out and over the road.’

Extract from 40 of the Conservation Area Character Appraisal

The Arboricultural Impact Assessment report concludes that;

‘From the foregoing information it can be reasonably concluded that only several “C” category trees are required to be removed to achieve the proposed works. These generally have limited visual amenity value when viewed from areas outside the site.’

“C” Category items are accepted as only have a limited life expectancy and would not normally be considered to be of sufficient quality to control development.



Plan extract taken from 3.4 of the Planning Statement

Whilst it is stated that only one tree would need to be removed along Church Street to create the new access, it seems to be ambitious given the brand new access into the site.

Ecology

The NPPF seeks to incorporate measures to conserve and enhance the natural and local environment, including 'Biodiversity and Geological Conservation'. Paragraph 179 of the NPPF requires that in determining planning applications significant harm resulting from a development should be avoided, adequately mitigated, or, as a last resort compensated for; and opportunities to incorporate biodiversity in and around developments should be encouraged.

The application has been supported by an Ecological Appraisal but on a site of this scale a Biodiversity Net Gain Assessment should have been provided by the applicant.

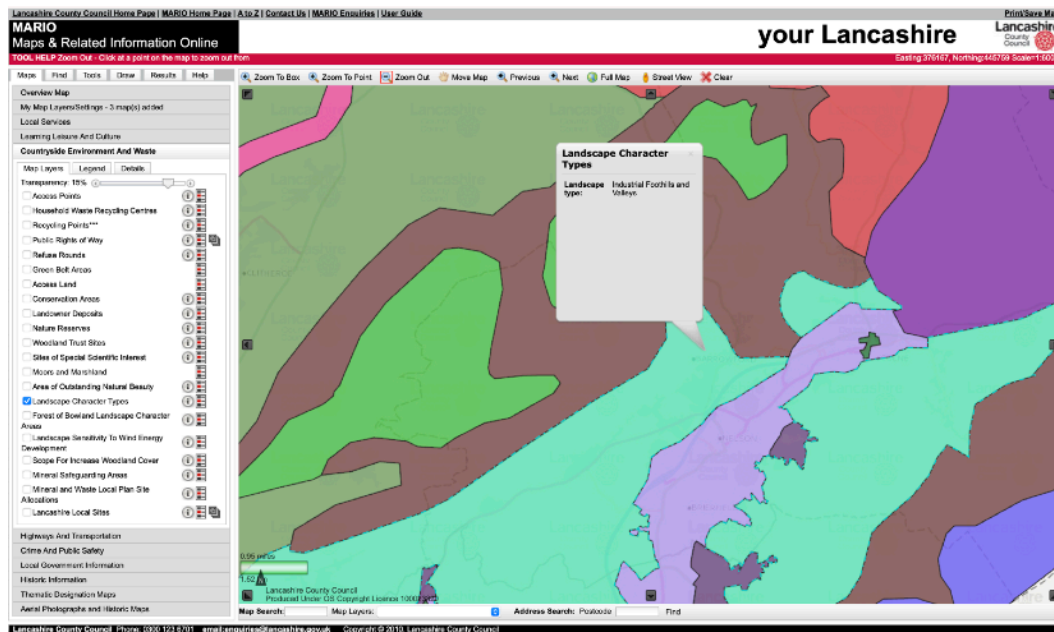
Whilst not mandatory at present, Natural England have formulated DEFRA Biometric Calculator 3.0 which is a method of measuring quantitative losses and gains that result from a development and land use changes. This is considered to be a major gap in the application submission. The absence of a Biodiversity Net Gain Assessment does not allow a full assessment of the application and its impacts on the environment.

5.5 Landscape Impact

The application has been supported by a Landscape Impact Assessment.

Regional designation

In the Lancashire Landscape Character Types the site is defined as 'Industrial Foothills and Valleys', refer to extract plan below.



The site is on an elevated position off Church Street and an identified key view within the Conservation Area. The northern side of Church Street has some pockets of development such as St Thomas's, but in this section of Barrowford, development is concentrated to the southern side of Church Street. There is clear break in built form along this section of road and this area of undeveloped Greenfield land does contribute to the overall landscape character and appearance of the area.

While the application site may not be located in a 'valued' landscape in the context of the NPPF (paragraph 174a) the site is valued by the people of Barrowford who acknowledge that the site has a positive impact on the Conservation Area. The site lies in the countryside which is valued by the Parish and wider community and where its intrinsic character and beauty should be recognised in accordance with Paragraph 174 (b) of the NPPF.

Development on the scale of this application would therefore compromise the landscape's rural character and in turn would have a detrimental impact on the landscape views in particular those identified within the Conservation Area.

The development would be an urbanising feature, eroding the visual qualities of the current open field which make a positive and valued part of the rural landscape and Conservation Area.

5.6 Other considerations

5.7 **Social Infrastructure**

NHS

It is noted that the East Lancashire NHS Trust have requested section 106 monies for the contribution to increase demand for health care services, a sum of £134,814.

LCC Schools

LCC schools have requested contribution to 9 secondary schools places equating to £207,555.

Doctor's Surgeries

There are two doctor's surgeries within Barrowford which have either full patient lists or limited availability.

Dentist's

There is currently one practice with no availability.

5.8 **Lack of renewable energy on site**

There is an absence of any renewable energy considerations in accordance with Policy ENV 3 - Renewable and Low Carbon Energy Generation.

5.9 **Lack of affordable housing**

There is no provision of affordable on site homes in line with Policy LIV 4

5.10 **Drainage**

The NPPF provides policy guidance relating to flood risk. Paragraph 163 states that local planning authorities, when determining planning applications, should ensure flood risk is not increased elsewhere.

The proposed site already causes surface water runoff and flooding in the immediate vicinity with effects in the wider area. Excessive surface water runoff creates problems on Gisburn Road adjacent to Holmefield House and Lucy Street at a point where the main drainage from the site meets another surface water drain before turning into Pendle Water.

The Parish Council can provide photographic evidence making clear grounds for major concern regarding water run-off in this area, especially onto Wheatley Lane Road.

The Parish Council produced a report in 2020 on water damage and flood in Barrowford as a whole. The following is a section of the report on the fields outside Oaklands House;

‘This field stands approximately 1.2m higher than Church Street, the land being retained by a tight-fitting sawn stone wall built in sections with dressed stone columns at approximately 21m spacings. The wall has no defined drainage points but water comes through the low point opposite Oaklands Farm Barn and at the entrance to Oaklands Lodge where a stone has been removed near its entrance. A large proportion of this water runs down towards Oaklands Farm Barn and into a double grate at a point where there is a natural dip in the road and where the water is shown running out of the wall in the photo below. The increase in water flow caused by these by these two sources of water run-off outstripped the drain’s capacity in February and pooled, running across the road and down the entrance. This caused severe flooding to both the garage/office and grounds of Oakland Farm Barn. The Clerk was informed of this problem by the owners of that property who have photographic evidence of the devastating effect of this increased water. The weekend of Storm Ciara was not observed by the Council but the four pictures taken on the 20th and 21st February show the effect 12 days later, during a much less pronounced rain period. ‘



Photo: Church Street



Photo: Oaklands Lodge



Photo: water pooling outside Oakland's Lodge

5.11 Recent appeal decision: 67 dwellings at Foster Road, Barnoldswick

The Planning Inspectorate recently dismissed an appeal for a site adjacent to the settlement boundary in Barnoldswick. Of note this site was allocated in the Part 2 LP in Feb 2021 as a reserved site but then was removed in the revised version in December 2021. It was noted that the Greenfield site is currently used for grazing and there is a rise in topography of the site with hedgerow and a number of TPO trees. Paragraph 12 of the decision specifically notes that;

'I consider that, due to its distinct topography and agricultural nature, the appeal site makes a positive contribution to the local landscape. For the same reason, due to the natural landform present I do not accept that there would be no change to the perceptual qualities of the landscape and settlement pattern, but rather I find that the proposed development would appear as a visual interruption in the landscape, particularly when viewed from the north of the site, resulting in the edge of the settlement appearing to project into the open countryside.'

The Inspector also draws on the 5 Year Housing land Supply which is currently believed to be at 7.46 and stated the following;

'I consider this fact to be a benefit in support of the appeal, albeit the weight is tempered somewhat by the Council's latest figures as presented in evidence, cited as the equivalent of 7.46 years housing supply.'

Note it was also acknowledged that the site was identified as Reserve site (P055) which has obviously now been withdrawn;

'whilst limited evidence regrading this matter has been provided, from the evidence it would appear that the emerging plan is at the early stages of plan making. I therefore attribute little weight to this matter in consideration of the appeal and, moreover, it does not affect my starting position in determining the appeal in accordance with the adopted development plan policies as presented.'

This appeal decision does draw on some similarities to the site on Church Street given that it is on the edge of the settlement boundary but within defined open countryside. The site was also put forward as a Reserved site which at the time the inspector gave little weight to.

6.0 Conclusions

The principle of development at this site presents conflicts with Policies SDP2, ENV1 and ENV2 of the Core Strategy; Policies BNDP01 and BNDP08 of the Neighbourhood Plan and the requirements of the Framework to create high quality, beautiful places which make effective use of land whilst safeguarding and improving the environment.

In summary the application should be refused for the following reasons;

1. Development of this scale would compromise the rural character and appearance, contrary to policy ENV1 and Barrowford Neighbourhood Plan policy BNDP 08
2. The development would create an urbanising feature which would erode the visual qualities of part of the Barrowford Conservation Area contrary to ENV1.
3. Increasing pressure on the social infrastructure, which is already at capacity, including health schools and roads, contrary to Policy ENV 7
4. Detrimental impact on existing drainage systems placing increasing pressure on known drainage 'hot spot' areas contrary to policy ENV7
5. No proper consideration of the Biodiversity New Gain which the site should be bringing forward, contrary to policy ENV2
6. A lack of any form of renewable energy considerations and designing for climate change contrary to policy ENV2
7. Unbalanced mixture of housing type, not fulfilling requirements set out in policy LIV3