



3 Hazelmere Road
Fulwood
Preston
PR2 9UN

) (01772) 863477
Email:- clerkgrimsarghparishcouncil@gmail.com
Date:- 12th January 2015

To:-
Mr Phil Cousins
Senior Planning Officer
Preston City Council
Environment Directorate
Lancastria House
77-79 Lancaster Road
Preston
PR1 2RH

Dear Mr Cousins,

Objection to Planning Application 06/2014/0902, Land off Preston Road, Grimsgarth. Outline planning application for up to 150 no dwellings with associated open space and landscaping with all matters reserved except for access.

As you are aware Grimsgarth Parish Council considered this Planning Application at their meeting held on Thursday 8 January 2015 and we wish to object to this application in the strongest terms and for the following reasons.

In summary:

- 1 Contrary to National, Regional and Local Planning Policies
- 2 Traffic Implications and Cumulative Impact of Developments in the Area
- 3 Visual Impact
- 4 Landscape and Heritage
- 5 Ecology
- 6 An Assessment of the GDL "Statement of Community Engagement"
- 7 Schools Places
- 8 Sustainability

1 Contrary to National, Regional and Local Planning Policies

As the current situation regarding the development of local planning policy is complex and fluid, Grimsargh Parish sought and obtained legal advice from DLA Piper LLP UK, regarding relevant National, Regional and Local Planning Policies (see attached Appendix A).

In our view, the application of planning policies in the context of this application in Grimsargh is as follows:

1.1 Local Plan 2004 Saved Policy DC10

In their Planning Statement Gladman Developments Limited (GDL) quote the relevant wording of this policy:

“Development will be permitted in the rural villages of Broughton, Grimsargh, Barton, Woodplumpton, and Lea Town when it:

- a) is infill and/or the re-use of buildings within the Settlement Development Boundary of the village as defined on the Proposals Map; and,*
- b) is consistent with the requirements of Policy H1 for housing proposals; or,*
- c) adjoins but is outside the Settlement Development Boundary, in special circumstances only to meet a specifically identified local employment, local community or local housing need and which could not be sited within the Settlement Development Boundary.*

In all the above circumstances, the existing character and appearance of the village should not be harmed, nor the amenities of nearby residents”

They appropriately acknowledge that:

“4.2.8 The proposal does not accord with this policy.”

and then continue to say:

“The extent to which the proposal conflicts with Policy DC10 is dealt with within the planning balance. Suffice to say, the conflict is immaterial and inconsequential”.

As our opinion would be that the conflict is far from *“immaterial and inconsequential”* we would very much like to understand how GDL deem it to be so *“within the planning balance”*. However, we are unable to find any such discussion in the GDL Planning Statement. We found reference to *“Planning Balance”* under paragraph 1.3.1, in the section *“Structure of the Statement”*, where it gives the title of Chapter 8 as *“Conclusions and Planning Balance”*. However, Chapter 8 does not give any clear discussion on *“planning balance”* or how the applicant has assessed the relative conflict of this application with Policy DC10.

We can only conclude that there was an intention to have a section discussing *“planning balance”* in Chapter 8, but that this has been omitted.

We believe this proposal would bring about considerable harm to the existing character and appearance of the village and hence is entirely contrary to Local Plan saved Policy DC10.

1.2 Central Lancashire Core Strategy Policy 1

Central Lancashire Core Strategy Policy 1 (f) states:

“In other places - smaller villages, substantially built up frontages and Major Developed Sites - development will typically be small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional reasons for larger scale redevelopment schemes.”

It is clear to all that this proposal is contrary to this plan, but GDL are reliant on their trump card of the LPA's current failure to demonstrate a 5 year housing land supply. This is being used regularly by GDL to effectively circumvent regional and local strategic planning policies, even when these are adopted and in the submission phases respectively.

They boast on their website of being a *"formidable, skilled and highly professional land promoter, obsessed with winning consent"* and they have gained national notoriety for their "predatory planning applications" and for making the use of the "loophole" that has now even been acknowledged by the Commons Select Committee looking into the Operation of the National Planning Policy Framework who comment in their report published 16th December 2014 thus:

"Third, we must address the complex issue of land supply. Provisions in the NPPF relating to the viability of housing land are leading to inappropriate development: these loopholes must be closed."

Therefore, it has to be recognised that this is not a strategically planned site identified through the proper processes and channels, but an opportunistic application from a land promoter seeking to 'make a quick buck' while the loopholes in the planning process, brought about through flawed elements of the NPPF still remain.

We would re-iterate that this proposal is undeniably completely contrary to Central Lancashire Core Strategy Policy 1.

1.3 Submitted Local Plan Policy HS4 - Rural Exception Affordable Housing

This policy states that:

"New housing development adjoining the villages of Barton, Broughton, Goosnargh, Grimsargh, Lea Town and Woodplumpton may be permitted in exceptional cases, for affordable housing, where a need has been identified as a result of a comprehensive needs assessment for the local area. Such affordable housing should be for occupancy by households meeting one or more of the following criteria:

- a) existing local residents on the housing waiting list;*
- b) people whose work provides important services in the village, and who need to live closer to the local community;*
- c) people with the offer of a job locally who cannot take up the offer unless affordable housing were available."*

GDL have carried out no *"comprehensive needs assessment for the local area"* and therefore there is no evidence of any need to justify an exception site.

The Wainhomes site for 64 homes off Ribblesdale Drive was given outline planning permission last year and this site does contain provision for 22 affordable homes.

Had there been any identified need (which there is not), Policy HS4 would enable the provision only through the use of an 'exception site'. GDL declare that this is not such an 'exception site' – of course they would, as, if it were an 'exception site' the development would have to comprise 100% affordable housing and that would not be as financially attractive for them.

For the reasons given above this proposal is clearly contrary to the Submitted Local Plan Policy HS4.

1.4 Submitted Local Plan Policy EN 1

The proposed development site is in an area defined as "Open Countryside". Policy EN 1 states:

"Development in the Open Countryside, as shown on the Policies Map, other than that permissible under policies HS4 and HS5, will be limited to:

- a) *that needed for purposes of agriculture or forestry or other uses appropriate to a rural area including uses which help to diversify the rural economy;*
- b) *the re use or re habitation of existing buildings;*
- c) *infilling within groups of buildings in smaller rural settlements.”*

Clearly items a) to c) above do not apply. We will take it as read that the proposal is not relevant to Policy HS5 – Agricultural Workers Dwellings and we have demonstrated that it is not in accordance with Policy HS4, therefore the proposal is clearly contrary to Policy EN2.

1.5 Submitted Local Plan Policy AD1 (b)

The submitted Local Plan contains the following:

“4.30 There are a number of villages situated within the open countryside with tightly constrained and defined boundaries. Development within the following villages, identified as AD1 (b) on the Policies Map, will need to be in accordance with Policy AD1 (b):

- *Barton*
- *Broughton*
- *Goosnargh*
- *Grimstargh*
- *Lea Town*
- *Woodplumpton*

4.31 Whilst the villages stated in paragraph 4.30 vary in size and range of services, none are identified in the Central Lancashire Core Strategy as Rural Local Service Centres, and therefore no significant growth aspirations exist for these villages.

4.32 In accordance with Central Lancashire Core Strategy Policy 1 (f), development within villages should typically be small-scale, infill, conversion of buildings and proposals to meet a local need. Limiting the scale of development within these villages serves to abide by the principles of sustainable development. Central Lancashire Core Strategy Policy 1 establishes a hierarchy of settlements within the Central Lancashire area based on size, accessibility, and range of services available. Villages appear at the bottom of this hierarchy as they are often small, are not situated in the most sustainable locations and cannot offer a wide range of services to residents.

4.33 Development proposals in compliance with Central Lancashire Core Strategy Policy 1 (f) will then be subject to the provisions of Policy AD1 (b). This is to ensure that where small-scale development is proposed in villages, it can only be considered acceptable when consideration is given to the relative impact on the village and its residents”.

This proposal is evidently not small-scale nor infill and, as highlighted above, there has been no local needs assessment, so there cannot be a claim of identified local need.

The words that we consider particularly important are:

“it can only be considered acceptable when consideration is given to the relative impact on the village and its residents”.

We consider the impact of this unwanted development would be severe for a number of reasons, laid out below and assert that this application is clearly not in compliance with Submitted Local Plan Policy AD1 (b)

2 Traffic Implications and Cumulative Impact of Developments in the Area

We have read the transport report accompanying the application and we find the basis for GDL’s traffic assessment highly questionable. They appear not to have taken into account all the additional

residential developments in Longridge, for which planning permission has been granted, together with the industrial and commercial expansion that is happening along Bluebell Way.

Firstly, however, we wish to comment on the recent Technical Filenote 2, produced by Ashley Helm in response to the Holding Direction issued by the Highways Agency:

- I. They have used the 2001 census workplace distribution for Longridge, which we would argue would not be typically representative of a brand new development in Grimsargh, which is highly likely to be marketed as being of close proximity to the M6 J31a – and hence attract a significant proportion of commuters.
- II. They have assumed the direction of traffic flow will be the same for Grimsargh residents as for Longridge – clearly not the case. For example, many of the Ribble Valley employers are out along the A59, for which the route most used from Grimsargh is down the M6 to J31 and along the A59.
- III. They have stated that “The vast majority of further afield workplace destinations are to the south of Longridge/Grimsargh.”
- IV. Given the above comments, a figure of just 15.7% for all traffic to be using the M6 south is not credible.
- V. In addition to the above we note they have arrived at a figure of just 69 morning peak hour vehicle movements off the development for 150 houses. This we would also contend is not a credible figure. For development like this of 150 houses we would anticipate a working population of in the region of 180, with (say) 2/3 leaving during peak hours, making a movement of 120 vehicles in the morning more representative.

We believe that the content of Technical Filenote 2 is so flawed that it should be disregarded.

Regarding other aspects of their Transport Assessment – they have omitted from their list of new developments 5 others where permission has been granted: 3/2014/0794, 3/2014/0722, 06/2012/0101, 3/2013/1029, 06/2012/0291, amounting to almost 300 additional houses.

Add to that the fact that Ribble Valley Borough Core Strategy has now been adopted (December 2014), with a requirement for a minimum of 633 new homes in Longridge, not satisfied by the approved new developments. There are further additional sites proposed – in application or consultation. Some of these, or other new developments, will have to be approved, in order to meet the commitments of the Ribble Valley Borough Core Strategy.

Residents in both Grimsargh and Longridge already consider the level of queueing along the road through the village during the busy periods in the morning and evenings to be unacceptable. We are well aware of the amount of development that is in progress or approved in Longridge, as highlighted above, and have yet to experience the additional significant impact that this will have.

We noted in the Central Lancashire Highways Master Plan (CLHMP), that the route through Grimsargh was identified as a red marked route (page 19) – and clearly forecast to be one of the most severe areas in the region for congestion both morning and evening.

We noted the LCC Highways response to the planning application to Ribble Valley Borough Council (RVBC), number 3/2014/0764. That response references the CLHMP and states:

“There is a real concern with the proposed development and its traffic generation combined with other potential development in Wyre, Fylde and Ribble Valley will “take up” the planned capacity on the wider network”.

The response also refers to the major transport improvements in the CLHMP that are identified to benefit the northern Preston area where the strategic sites for development are planned: Preston Western Distributor Road, Broughton Congestion Relief, M55 Junction 1, M6 J32. It is easy to see how those identified improvements might bring benefits for traffic resulting from the site referred to in Longridge as already threatening to “take up” the planned capacity. However, the only

improvement relating to the B6243 through Grimsargh in the CLHMP is to the Longridge-Grimsargh-Ribbleton-Preston City Centre Public Transport Priority Network. Details of what these improvements will be not known.

The (vast) majority of journeys into and out of the village to places of work are made by car. Few people work along the route of the number 1 bus. Very few folk are willing to take two bus journeys to and from work.

Likewise for shopping – people do not, generally, carry their supermarket shopping home on the bus. Rightly, or wrongly, a large proportion of the school-run journeys in the morning are by car – even for those currently living in relative proximity to the School (witness cars coming off The Hills estate in the mornings and pulling into the Church/School car parks), as most parents drop their children at school before carrying on to work out of the village. The distance from the proposed development site to St Michaels is 1200m, so it can be assumed the same will apply. Indeed all these observations are in accordance with the view taken in the CLHMP that “The car is the dominant travel choice for most people for most journeys” (Page 12).

So – CLHMP only proposes improvements affecting public transport - the bus services – services that are already every 10 minutes and only affect a small proportion of journeys. So the reality is, there are no realistic improvements to the transport infrastructure that are going to improve things for residents of Grimsargh.

Recently there has been a particular concern over the notable rise in the number of instances of “gridlock” when the cumulative effect of traffic snarls on the M6 and additional bottlenecks (e.g. temporary traffic lights) have brought traffic to a standstill through the village. This can effectively block Skew Bridge – leaving **no route through for emergency vehicles**.

3 Visual Impact

This development will have a dramatic visual impact on the village – being so prominently situated on the main road leading in from Longridge. We have read the assessment by TPM for GDL and note their summary statement on visual impact:

“There are near views to the proposal site from the immediate properties and public footpaths, however within the wider landscape context there are a limited number of views to the proposal site from public locations. Views are limited due to distance to the receptor and the layered screening the existing hedgerow and hedgerow trees provide. The visual sensitivity ranges from High - Low with the highest sensitivity being found at residential properties and footpaths and rights of way. Where views are from users of the road network, the sensitivity has been assessed as Low.” We would very strongly disagree with their assessment of the sensitivity as low. The hedges along the development site are relatively low, according fine views out across the open countryside to the trees on the approach to the village, as clearly illustrated in the photograph below, which is across the development site.



The perception of openness is absolutely apparent all who pass the site. It must also be noted that there are double decker buses passing the site every 10 minutes. The view of TPM for GDL, that the “vehicle receptors” in their report would have low and medium sensitivity (despite the relatively low level of these hedges) seems, frankly, extraordinary. Contrast this with the view of the Inspector in the case of the application for Land North of The Hills, Appeal Ref: APP/N2345/A/13/2201821. In the case of that proposed development, the planned houses were set a field’s width behind a considerably higher hedge, yet the opinion of the Inspector was:

“Although it is suggested that this hedge prevents views across the site, it was apparent at my site visit that some views are possible through gaps in the hedge and that when walking along Longridge Road one has a perception of open countryside beyond the hedge. Although set back by the distance of one field I consider that the proposed houses would be apparent behind the hedge and the perception of openness would be lost. Clearly the hedge could be managed to make it thicker, but I accept that at least in the short term, such management would be likely to result in a reduction in height. Moreover I accept that even at its current height passengers upstairs on the double decker bus, which service runs every 10 minutes, and possibly drivers of other high sided vehicles, would have views over the hedge of built development.”

The visual impact will be further exacerbated by the fact that GDL propose that some of the properties will be 2.5 or 3 storeys high.

4 Landscape and Heritage

In their “Landscape and Visual Impact Assessment”, TPM (for GDL) have defined 5 Local Character Areas (LCAs). It is noted that what they have identified as LCA 03, Tun Brook Wood, is described as having a designation of “Ancient Woodland & Lancashire Biological Heritage Site (BHS).” They omit in that document to mention that a considerable amount (approximately 50%) of LCA 03 is, in fact, part of Red Scar and Tun Brook Site of Special Scientific Interest (SSSI). There appears to be no acknowledgement through that report either of the proximity of the site to a SSSI.

In the same report referred to above, the former Grimsargh Reservoirs - directly across the road from the proposed site - are identified as LCA 05 – Wetlands. This area has been described as having “No designation”, when it is in fact a Lancashire Biological Heritage Site.

They do acknowledge these statuses in their Ecology Reports, but this substantiates our contention that the supporting documentation to the proposal contains significant flaws and weaknesses.

Regarding the heritage of the area, our local author and historian, David Hindle has drawn our attention to the site’s links with the Romans, Vikings, Cromwell and the late Victorian era when the Reverent Peters established a huge Victorian preparatory school for boys in 1873 based on the Hermitage (full details can be found in ‘Grimsargh: The Story of a Lancashire Village’ by David Hindle). David sought further confirmation of the heritage from Peter Iles, County Archaeologist (Specialist Advisory Services) at Lancashire County Council who identified the site as being Post Medieval Enclosure, which should be enhanced and a datasheet explaining the category and why such landscape should be safeguarded (see Appendix B).

5 Ecology

Regarding their Ecology Report – we note there is an overall conclusion that there are unlikely to GCNs present on the site (para 4.41). This is despite the acknowledged records of presence of GCNs in the vicinity of the site – and that there have been no site surveys taken of 9 out of the 10 ponds in the area – due to a stated claim that “permissions to survey these ponds could not be gained”. There is no evidence as to the nature of the attempts made to gain such permission (reference our comments below about the “Statement of Community Engagement and GDL’s ability to deliver

leaflets to residences). Local knowledge has been provided to us to indicate that GCNs are most definitely present in a number of the other ponds closest to the site.

In addition although GDL have submitted an Ecological Appraisal there has been no survey of Tun Brook in relation to fish and invertebrates. This stream is known to contain eels and is a tributary of the River Ribble, a noted Salmon river and should be afforded protection under the Eel Directive, Freshwaters Fisheries Act and the Water Framework Directive. We note that the Ribble Rivers Trust has been consulted on this application and they have raised concerns about this proposed development and they are asking for a full survey on fish and invertebrates and a more detailed otter survey as they are aware of otters in the vicinity. We would fully endorse the comments by Ribble Rivers Trust and that these surveys should be undertaken before the Planning Application can be considered.

We would contend that the above observations are further indications of lack of robustness in their supporting documentation.

6 An Assessment of the GDL “Statement of Community Engagement”

They refer in their statement to *“Leaflets outlining the development principles and seeking comments were distributed week commencing 6th October 2014 to local councillors and over 425 Households & businesses within the proximity of the site”*. However, during their attendance at Grimsargh Parish Council’s meeting on the 3rd December 2014, they were challenged by residents who reported that none of the properties immediately adjacent to the site had received the leaflets. They responded to say that the leaflets had been delivered by Royal Mail. We have since received numerous comments from residents on Elston Lane to say they did not receive these leaflets either. It calls into question their processes for delivering anything to surrounding properties.

They had just 15 people attend the public event and received only one written response (which they told us verbally at our Parish Council meeting on 3rd December). We would argue that this does not in any way constitute meaningful consultation or Community Engagement. We believe a more representative picture of the views of local residents will be contained in the content of the responses to PCC from residents to the planning application.

7 Schools Places

A number of parents resident in the village have reported being told that they cannot be guaranteed a place at one of the local primary schools – even in some cases where there is already an older sibling at the school. The attached letters were obtained from the heads of those schools, at the time of the appeal into the Wainhomes development off Ribblesdale Drive (see Appendix C). So those statements are in the context of not including the additional school places required as a result of that development now receiving planning permission.

8 Sustainability

Whilst this section has been left to last – it is perhaps the most important, but needed to be read in the context of all the previous observations.

The NPPF has a presumption in favour of sustainable development. The GDL proposal is unsustainable because its scale and location is out of keeping with the social, economic and geographical characteristics of Grimsargh.

This is not simply our subjective opinion, it is a fact established by all the research which went into the Central Lancashire Core Strategy (CLCS), adopted in July 2012 and endorsed by a Government Inspector as being in total conformity with the National Planning Policy Framework (NPPF). In the CLCS Grimsargh is classified as a "smaller village" where development will be typically small scale

and limited to appropriate infilling, conversion of buildings and proposals to meet local need. Irrespective of 35% of the dwellings in the GDL scheme being suggested as "affordable", the overall total of 150, together with a lack of any substantive survey of local need, clearly makes the proposal unsustainable.

The Submission Edition of the Preston Local Plan develops the CLCS policies and shows them on an Ordnance Survey map base. Policy AD1 (b) confirms that no significant growth aspirations exist for villages, such as Grimsargh, which are not Rural Local Service Centres. The Policy Map shows the application site as lying outside the confines of the village and thereby subject to policy EN1 - Open Countryside. Policy HS4 does say affordable housing adjoining villages like Grimsargh may be allowed in exceptional circumstances where some need has been established through a comprehensive needs assessment, but even if some need does exist, a 150 dwelling total is way out of proportion for a small village (where, in any case, permission already exists for over 60 new dwellings at the Wainhomes site).

The site would be an eastern extension of Grimsargh, moving towards the south western extensions being proposed for Longridge. It is not sustainable for Grimsargh to be threatened by merger with Longridge any more than it is for Grimsargh to be merged with Preston. The Area of Separation policy in the CLCS recognises the importance of settlements retaining their separate physical identities and that crucial planning principle obviously must also apply to the east of Grimsargh, even though Ribble Valley, where Longridge lies, is outside the area covered by the CLCS.

We consider the views of the farmer who currently farms the land on the proposed development site to be particularly important in the context of sustainability (full statement given in Appendix D):

"The land is well known throughout the Grimsargh community as an agricultural field farmed by our family farm for the past 26 years. The field has not been subject to modern intensive farming techniques. Having never been ploughed by mechanised techniques, the field grows many native grasses and wildflowers. The traditional ridge and furrow structure of the ground still remains today.

The quality grade 3 land is a valuable part of our family business, supporting three generations. Consisting of 18 inches of top soil the field grows quality grasses, providing regularly grazing for our farms 50 pedigree Holstein young stock and 120 sheep. During the summer months grass is also mown and baled to produce hay, yielding over 200 big bales per year.

Environmental sustainability is an integral part of our farming ethos. Our farming techniques ensure ground nesting birds and ponds are not disturbed, and continue to support the abundance of wildlife living in the field. From a conservation point of view, I am aware of the declining population of Lapwings and Curlews that regularly use the field for breeding. I always take special precautions to safeguard their eggs and young from machinery.

The field is part of an Entry Level Stewardship (ELS) Scheme until 2017. The scheme aims to improve water quality and reduce soil erosion, improve conditions for farmland wildlife, maintain and enhance landscape character, protect the historic environment. Mixed stocking also forms part of the ELS to encourage a diversity of sward structure and plant and invertebrate species. To meet this requirement the field must be maintained as grass, forbidding cultivation. Enhanced hedgerow management means the hedgerows are only cut once every three years and a 2m buffer strip at each side is maintained.

As a farming business, we are highly dependent on agricultural land. The loss of this significant proportion of land will be financially detrimental. The land will be near impossible for us to replace due to a shortage in the area."

We are also aware that this land is in a Minerals Sensitive Area – and subject to the protection that provides.

We also note that there is no Environmental Impact Assessment (EIA) screening statement included in the documentation. We are of the view that a full EIA is required (the requirements are not satisfied by the documentation supplied) due to the fact that it is an urban development, the site exceeds 5 hectares and there is considerable cumulative impact on the village with this and other developments in the area.

Taking all the above, together with the issues of traffic, the visual impact, adverse effects on the landscape heritage and the ecology of the area and the lack of school places, if the current lack of a 5 year housing land supply trumps all this, then we might as well send the planners home and let the building industry or, worse still, opportunistic predatory development companies decide the scale of Preston's future development and where it should all go!

Appendix A

See overleaf

Considered Assessment of the Planning Policy Status, following advice from DLA Piper

Without waiving privilege in the legal advice the Parish Council has received from DLA Piper, the following paragraphs set out the reasons why the Proposal is contrary to the emerging and existing Local Plan and paragraph 11 of the NPPF:

The Proposal is contrary to the emerging and existing Local Plans ("existing Local Plan") (together, "Local Plans") and paragraph 11 of the NPPF

There are clear policies set out in Policies DC10 of the existing Local Plan and Policies EN1 and HS4 of the draft Local Plan which expressly provide protection for Open Countryside in the Preston region, with *specific protection* for this site under Policies DC10 and HS4.

Policy DC10(c) of the existing Local Plan provides that development will be permitted in the rural village of Grimsargh where it adjoins but is outside the Settlement Development Boundary, in special circumstances only, to meet a specifically identified local employment, local community or local housing need and which could not be sited within the Settlement Development Boundary.

Nowhere in the Housing Report has the Applicant identified any such need within the village to support the Proposal. In fact, the Applicant has not even demonstrated a housing shortfall in the area *generally*, due to not having carried out a comprehensive needs assessment as required by Policy HS4 of the draft Local Plan.

Furthermore, the Applicant has totally failed to produce any evidence of exceptional reasons for larger scale development within the village of Grimsargh. Indeed, it is accepted by the Applicant in its Housing Report at paragraph 1.11 that the proposed development is not an "exception site" and therefore cannot currently or in the future fall within the "special circumstances" under Policy DC10(c) of the existing Local Plan or the "exceptional circumstances" under HS4 of the draft Local Plan.

In any event, even if the Applicant *did* identify a need within the village and met the requirements of Policy DC10(c) (which it has failed to do in this case), the catch all provision in Policy DC10 still provides that the "existing character and appearance of the village should not be harmed, nor the amenities of nearby residents."

It is submitted that the existing character and appearance of the village and the amenities of nearby residents would in fact be harmed.

The Applicant has, therefore, categorically failed to comply with both Policy DC10(c) of the existing Local Plan and Policy HS4 of the draft Local Plan.

It is accepted that the Council cannot demonstrate a five year housing land supply and therefore paragraphs 49 and 14 of the NPPF are the policy starting point for determining residential applications. The Council's housing policies are considered out of date because of paragraph 49. However, it is submitted that Policy DC10 is *not* a housing Policy for the following reasons:

Policy DC10 gives specific protection to rural villages including Grimsargh. Whilst the Grimsargh area is not classified as an Area of Outstanding Natural Beauty, the visual amenity of this area was still considered important enough by the Council to be worthy of protection by a specific policy;

Policy DC10 was considered to be relevant and important after the Local Plan period and therefore it was "saved" by the Secretary of State for Communities and Local Government in 2007, pursuant to the Planning and Compulsory Purchase Act 2004. Indeed, Policy DC10 is consistent with paragraph 55 and the overarching principles of the NPPF which seek to preserve and enhance the countryside and natural environment; and

Policy DC10 is, in reality, an environmental policy designed to protect the rural environment and landscape.

Consistent with the approach taken by the Inspector in *Gladman v Stroud DC*, environmental policies are not to be treated as being out of date under paragraph 49 of the NPPF and therefore full weight should be accorded to the policy requirements of DC10.

Accepting that the application is to be decided in accordance with paragraph 14 of the NPPF (as well as Policy DC10), it is necessary to consider whether the development will have "*adverse impacts which would significantly and demonstrably outweigh the benefits or would be contrary to specific policies of the NPPF*". This is a case where the adverse impacts of the grant of planning permission would significantly and demonstrably outweigh the benefits.

Appendix B

See overleaf

=====
Message Received: Jan 05 2015, 03:12 PM
From: "Iles, Peter"

To: "'hindle"
Cc:
Subject: RE: Test

Hi David,

HER data, including the Historic Landscape Character (HLC) mapping, attached as requested. The development area is classified as 'Post Medieval Enclosure', see the attached data sheet for what that means.

Peter Iles
Specialist Advisory Services

Lancashire County Council
Development Management
PO Box 100
County Hall
Preston
PR1 0LD

t.01772 531550

e. peter.iles@lancashire.gov.uk

LANCASHIRE
HISTORIC LANDSCAPE
CHARACTER TYPE

POST-MEDIEVAL
ENCLOSURE

Definition:

This type comprises a variety of field forms, size tends to be medium (4 to 16 hectares) but with a significant percentage of small enclosures. Two thirds of the type has an irregular layout while the remainder has a more planned pattern. This is a reflection of the piecemeal private enclosure of land in Lancashire in the period between AD 1600 – 1850 rather than the widespread planned enclosure much more prevalent in other parts of England such as the Midlands. This type may include land which was previously enclosed and later re-modelled as well as that associated with the agricultural exploitation of new areas that marked the agricultural 'revolution' of the 17th to early 19th centuries.

Typical historical and archaeological components

As with **Ancient Enclosure** the typical historical and archaeological components of the **Post-Medieval Enclosure** type are the boundaries which define the fields, the ditches used to drain them, the roads and tracks which traverse them and the buildings of those living and working within the area. Boundaries include water-filled ditches, quickset hedges, stone walls and fences.

Attributes of the former mossland areas include drainage ditches, causeways, windmills and bridges. There is a possibility of well-preserved archaeological deposits existing under the ground surface where the **Post-Medieval Enclosure** type covers peaty or former wetland soils.

Some of the main ditches are potentially related to an earlier enclosure period, being left in place as they were too large to contemplate changing and because they functioned effectively.

Enhancing and safeguarding the type

- *Conserve* the character of the **Post-Medieval Enclosure** type giving priority to enclosures from lowland moss and upland moor. The type is broadly characterised by three processes of agricultural improvement: the drainage and enclosure of the mosslands of West Lancashire and the Fylde, the enclosure of upland moor on Bowland and the South Pennines and the more general improvement and reorganisation of much of the earlier ancient landscape. Whilst the latter is important it is the former two processes that provide the most significant contribution of the period to the landscape character of the county – consequently, it is the attributes and time depth provided by these that should be afforded the greatest priority for conservation and enhancement. In addition, opportunities should be sought for the enhancement and interpretation of post-medieval reclaimed landscapes.

Appendix C

See overleaf

GRIMSARGH ST.MICHAEL'S CHURCH OF ENGLAND PRIMARY SCHOOL

Preston Road, GRIMSARGH, Preston Lancashire, PR25SD

Telephone: (01772) 653600

Fax: (01772)798261

E mail head@grimsargh-st-michaels.lancs.sch.uk



Headteacher: Mrs K M Ward

23 April 2014

To whom it may concern,

Re: 06/2013/0533 (Wainhome Developments – application for residential development (Class C3) of 4.5 hectares of land for up to 70 no. dwellings with new highway access from Ribblesdale Drive)

The admission numbers set by the governors at this school is 30. As the Local Authority statutory requirement is that no more than 30 children can be admitted to an infant class, this is the maximum number of children who can be admitted each year.

For the last 5 years the school has admitted 30 children into reception class and each year the school has been oversubscribed. Each year we have a waiting list and most years there are appeals for children wanting places.

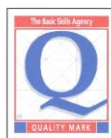
Despite the fact that the school admits children who live in the village above siblings who live out of the area, we have had children who live in the area on a waiting list to gain a place.

In 2013 a child who regularly worships at St Michael's church and lives within 3 miles of school was refused admission as the school was so oversubscribed. 2 siblings were also refused admission under the oversubscription criteria set out in the admissions policy.

Further applications from the proposed housing would add further pressure to the oversubscription problems.

Yours sincerely

Kathryn Ward
Headteacher



'Inspiring, believing and achieving in our loving Christian Community'



Alston Lane Catholic Primary School

Mr. M. FitzGibbon. BA Qts
Headteacher

Preston Road
Longridge
Preston
Lancashire
PR3 3BJ
Tel: (01772) 783661
Fax: (01772) 784875
bursar@alstonlane.lancs.sch.uk

3.4.14

To whom it may concern

Re: 06/2013/0533 (Wainhome Developments - application for residential development (Class C3) of 4.5 hectares of land for up to 70no. dwellings with new highway access from Ribblesdale Drive)

The admission number set by the Governors at this school is 30. This means that no more than 30 children can be admitted in any infant year group.

The school has admitted 30 children each year for the last 3 years and we expect this trend to continue. We are currently oversubscribed for Reception Class (Sept 2014), meaning that some families living within the Parish boundary will not be admitted. Further applicants from the proposed housing would add further pressure to this procedure.

The school admits siblings of children already attending the school under point 4 of the oversubscription criteria set out in the school's admissions policy, unless they fulfil higher criteria. It is possible that with a larger set of applicants each year, some siblings may be refused admission. This could include children living in Grimsargh. This would certainly be the case if new applicants fulfilled criteria higher than these siblings in the oversubscription criteria. E.g. Baptised Catholic living in the Parish.

This information accurately sets out the school's position in respect to admissions for September 2014 and the future.

Yours sincerely

M FitzGibbon



Appendix D

See overleaf

Statement of

Name obscured so as to prevent publication on the Preston City Council website – details provided to PCC's Planning Officer

I was disappointed to hear about the proposed new residential development on the land off Preston Road, Grimsargh. The proposed site is steeped in history and supports a diverse habitat for wildlife and plants.

The site is the old cricket field for the once renowned St. Johns College, dating back to the nineteenth century. See the attached map of the college grounds including the cricket grounds and accompanying pavilion. With a number of public footpaths passing through the field, it is now a popular piece of countryside for local people to enjoy and explore its historical features.

The land is well known throughout the Grimsargh community as an agricultural field farmed by our family farm for the past 26 years. The field has not been subject to modern intensive farming techniques. Having never been ploughed by mechanised techniques, the field grows many native grasses and wildflowers. The traditional ridge and furrow structure of the ground still remains today.

The quality grade 3 land is a valuable part of our family business, supporting three generations. Consisting of 18 inches of top soil the field grows quality grasses, providing regularly grazing for our farms 50 pedigree Holstein young stock and 120 sheep. During the summer months grass is also mown and baled to produce hay, yielding over 200 big bales per year.

Environmental sustainability is an integral part of our farming ethos. Our farming techniques ensure ground nesting birds and ponds are not disturbed, and continue to support the abundance of wildlife living in the field. From a conservation point of view, I am aware of the declining population of Lapwings and Curlews that regularly use the field for breeding. I always take special precautions to safeguard their eggs and young from machinery.

The field is part of an Entry Level Stewardship (ELS) Scheme until 2017. The scheme aims to improve water quality and reduce soil erosion, improve conditions for farmland wildlife, maintain and enhance landscape character, protect the historic environment. Mixed stocking also forms part of the ELS to encourage a diversity of sward structure and plant and invertebrate species. To meet this requirement the field must be maintained as grass, forbidding

cultivation. Enhanced hedgerow management means the hedgerows are only cut once every three years and a 2m buffer strip at each side is maintained.

As a farming business, we are highly dependent on agricultural land. The loss of this significant proportion of land will be financially detrimental. The land will be near impossible for us to replace due to a shortage in the area.

It is in the interests of the community that the village remains separate from the town of Longridge. The site is the last green field on the edge of Preston Road before the boundary to the Ribble Valley Borough Council. Ensuring this field is always a green belt will protect Grimsargh's village status for the future.