



The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester

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Patron
Her Majesty the Queen
President
Emma Bridgewater
Chair
Debra McConnell

22 July 2020

Dear Mrs Barnes,

1. I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester (Herein CPRE) with an objection to about planning application 2019/0747/FUL for the construction of a mushroom 'farm' in conjunction with the agricultural business, Smithy Mushrooms Limited, to include portal frame buildings, car parking, hardstanding and sustainable drainage system at address: Bungalow Farm, Heatons Bridge Road, Scarisbrick, West Lancashire, L40 8JQ.

Planning Balance

2. I have read the officer report and I wish to raise concerns over the planning balance and resultant recommendation to approve that has been concluded. I do not believe that the benefits arising from the development will outweigh the harm. Consequently, I recommend that the application should be refused. Below I set out the grounds for refusal.

Green Belt

3. The officer report states there are 7 exceptions to this {Green Belt}, including 'buildings for agriculture and forestry'. Agriculture is defined by s336(1) of the Town and Country Planning Act 1990 as:

'Horticulture, fruit growing, seed-growing, dairy farming, the breeding and keeping of livestock (including any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land), the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds, and the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes'.

4. The conclusion that the development is an exception to Green Belt due to it being for agriculture is open to debate. Horticulture involves propagation of plants. A mushroom is not a plant, nor a fruit or seed. The growing of mushrooms, a fungi, is not strictly any of the operations cited, it requires a laboratory, and are more similar to employment B2 manufacturing and B8 warehousing and distribution use and in my view is not strictly agricultural.
5. As set out in National Planning Policy Framework (NPPF) Section 13, the Government attaches great importance to Green Belts. They are a nationally significant planning policy designation, which aims to prevent urban sprawl and to keep land permanently open. There are five important purposes. In this case the purpose d) of Paragraph 134 is harmed as the countryside would be severely encroached.
6. CPRE believes the proposal constitutes 'inappropriate development', which the NPPF Paragraph 143 is by definition harmful. We accept there are occasions where development might be allowed due to 'very special circumstances' or as an exception to Green Belt. In this case there are no justified 'very special circumstances' and, as stated, ought not to be considered as an exception under NPPF Paragraph 145 a).
7. Without prejudice, if the Council was minded to approve the application CPRE would request a 'Call in' by the Secretary of State due to the significant and substantial harm to Green Belt purpose. The large scale built intrusion implied by this development proposal would be so prominent in the specific receiving landscape it would completely remove the feature of openness. In my view, this is an insurmountable planning harm and the Council should refuse the application on this basis. Because of the significant public interest in the case a planning inquiry would be justified. There is an issue of precedent in this case to consider. I note the Call-In request from Councillor Blundell.

Landscape and Visual Impact

8. I find paragraph 10.13 of the officer report to be inaccurate. In my view it simply cannot be concluded that a building, which is 17,561m² and 7.9 metres high (1.7 hectares of building mass) would cause 'minimal harm to landscape character' or for the visual amenity harm to be described as merely 'limited'. The existing large scale agricultural buildings are much smaller in comparison to the proposed development. CPRE also accepts the need to support farm diversification and modern farming practices, but not at all cost to the rural landscape and other features that form countryside character.
9. I find that there would be insurmountable harm to the receiving landscape and severe visual impact. I do not think the application is supported by adequate illustrative drawings to show how the mass of the building would sit in the landscape to enable decision makers to take a proper decision. The short and long range visual impacts in my view would be severe and permanent. Mitigation or compensation is not possible to remove such a 'blot on the landscape' meaning the harm is insurmountable via conditions. On this planning ground alone the application could be refused.

Ecology

10. The Council must fulfil the requirements of the Wildlife and Countryside Act 1981. Natural England and MEAS have not objected outright to the application, but they have identified a number of harmful impacts upon the Ribble Estuary and Martin Mere, Burscough SSSI arising from the proposal relating to noise and visual disturbance to wintering and breeding birds from the construction and operational stages of the development. There are also recommendations concerning protected species including, Badgers, Red Squirrel and Water Vole.
11. CPRE is concerned that the conditions will not adequately mitigate the negative impacts. This important issue should be fully considered by the development committee. I am aware that Lancashire Wildlife Trust is similarly articulated concerns about the impacts on the ecology.

Traffic Safety Concerns

12. There are also site access issues and concerns arising from the proposed development design with 58 car parking spaces and excessive movements of heavy goods vehicles to transport the quantity of mushrooms anticipated and the on small rural lanes, with immediate danger to the children and parents pushing buggies attending St Mary's Catholic Primary School.
13. The turning space required for HGVs accessing and leaving the site must be considered, and the potential for multiple vehicles accessing at the same time. Local people have raised issues with vehicles having to mount the pavements with danger to pedestrians and also cyclists.

Water and Flooding Issues

14. CPRE is concerned about the negative impacts to surface water and local flood risk as identified by United Utilities and Lancashire County Council the Lead Local Flood Risk Authority. These are negative impacts arising from the proposal, which must be fully considered in the planning balance.

Other Planning harms

15. There are a range of other planning harms, not least (list not exhaustive):
 - The loss of Best and Most versatile grade 1 farm land, the highest grade, which is a nationally significant asset, and should be retained for future generations;
 - Loss of residential Amenity with harm to tranquillity arising from the 24hour operations, the site would be a noisy neighbour, and there would inevitably be security lighting; and,
 - Light pollution - CPRE advocates the retention of our threatened dark skies to ensure people can see the stars in the future. Light pollution would be another detrimental impact to the area from the proposed development.

Local Objection

16. This planning application is the source of considerable local community objection, including from representative parish councils, and this local opinion must be duly reflected to planning members in the officer report summary in accordance with the Localism Act 2011. .

Alternative Site

17. CPRE promotes the reuse of brownfield sites in advance of the bulldozing of farmland. We would recommend that planning officers discuss sites on the Brownfield Register to enable their business aspirations to be realised and the job creation benefits achieved.

Summary

18. For the reasons set out above in this letter CPRE recommends the Development Committee refuses the application.
19. If you require any further information, please do be in contact without hesitation.

Yours sincerely

Jackie Copley MRTPI MA BA(Hons) PgCERT

Planning Manager

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