



The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester

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Story Homes Project Team

By Email: cuerdale@havingyoursay.co.uk

24th February 2022

Patron
Her Majesty The Queen
President
Emma Bridgewater CBE
Group President
Nick Thompson
Group Chair
Debbie McConnell
Scientific Adviser
Dr Des Brennan

Dear Story Homes,

I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester (CPRE) concerning your proposal for the Garden Village in Samlesbury as set out on your website <https://cuerdalegardenvillage.co.uk/>.

CPRE strongly object to the proposals due to the harm to Green Belt and other material planning harms arising from the loss of more than 160 hectares of farmland and natural habitat in the location between the A59, the M6 and Cuerdale Lane.

The land shown below in the extract from the Cuerdale Garden Village proposal are not allocations in the adopted South Ribble Local Plan, 2015. The South Ribble Local Plan allocated 6,905 dwellings over 16 years of 2010-2026.

CPRE is not anti-Garden Villages per se. In fact, it understands there can be benefit from a master planned approach and delivery of community infrastructure, in circumstances where the development is justified and if the location is right in terms of a sustainability criteria. However, CPRE considers in this case that there is no justification. Planning law requires that applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise. In our view there are no such reason to allow the development.



 First Phase of Cuerdale Garden Village
 Future Potential Phases of Cuerdale Garden Village

The Lancashire branch of Campaign to Protect Rural England

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CPRE considers that the local plan should be delivered and the focus on reusing the significant brownfield resources that exist in the main settlements of Central Lancashire and neighbouring areas such as Preston and Blackburn should be maintained in advance of development of a Garden Village.

The Local Plan Policy D3 sets out that outside of the defined settlements and sites for housing, a new dwelling will only be permitted if it allows rural workers in forestry, farm, or other rural employment to live at or in the vicinity of their place of work. The Garden Village has no clearly established functional need, nor is the impact on the landscape minimised. In fact, it would remove agricultural land. There is no evidence that absence of this development would cause loss of crops, or rural employment to any sites used as evidence.

CPRE considers that there are significant negative impacts arising from Phase 1 and this must be considered in the round with the further phases with the cumulative impacts thoroughly considered.

Green Belt

The entirety of the site lies within the Green Belt, and the development is inappropriate in a definitional and spatial sense. Frankly, it is absurd to state the development of the site will not undermine the strategic function of the Green Belt, which is of national significance. There would be significant harm to the Green Belt purpose with three if not four functions harmed. The land would lead to unrestricted sprawl and given the future phases intended are not constrained and there would be risk of further extension through speculative applications such as this. There is also a high level of countryside encroachment.

CPRE is aware that Story Homes has progressed proposals in Green Belt land elsewhere in Lancashire that have been judged to pose a negative planning balance and have consequently not been successful at being granted approval.

An extensive network of pedestrian / cycle routes should be promoted irrespective of built development as people enjoy health and well-being benefits from exercising in green areas and enjoy rural views.

Housing Need

When considering the Department for Levelling up, Housing and Communities 2021 Housing Delivery Test data the Central Lancashire authorities together delivered 5,233 dwellings over the past three years (2018-19, 2019-20 and 2020-21) against a requirement of 1,665 dwellings (South Ribble performed at 243%, Chorley 141%, and Preston 393%) equal to 314%. This over performance cannot be disputed. What is more the housing requirement for the past three years was based on out-of-date Office of National Statistics 2014 data which implies a high growth trend. ONS population data for 2016, 2018 and 2020 shows that such high growth planned did not materialise, nor is it likely to do so in the future. All areas of the North West, and the rest of the country, are simultaneously planning for growth. There is no source for the population identified as the Government has no policy to increase international immigration in fact it pushed for Brexit to do the opposite. The new housing is simply not necessary or justifiable to release Green Belt.

Affordable Housing

CPRE is aware of affordable housing shortages in rural areas as wages have not kept pace with property value increases. The proposals must reflect what is in the Strategic Market Housing Assessment for Central Lancashire.

CPRE would in any case recommend that for such a large 1,300 dwelling development proposal to set out the scale of affordable contribution at the outline stage, including the Housing mix and type. Not all employees would be paid enough to be able to access market value housing and for the purpose of responding to balanced communities this issue should be set out at an earlier rather than later stage. CPRE notes a development of such scale would as a minimum require one if not two local centres, leisure facilities and a secondary and a primary school to cater for the additional demand and to ensure a sustainable development in the long term.

Economic need

CPRE notes the proximity of the proposed Cuerdale Garden Village will respond to the growth opportunities provided by the Samlesbury Enterprise Zone. The proposal includes 164,000 sq m of speculative commercial and employment uses (General Industry (B2), Storage and Distribution (B8)). The need for the employment development should be more clearly justified given it involves Green Belt release. There needs to be clear evidence that there is no alternative land.

The Brownfield Registers for the authorities of Central Lancashire show clearly that there are other suitable locations to accommodate the employment use nearer to established urban areas rather than in the countryside.

CPRE champions the value and role of the rural economy and the need to retain farmland for jobs and future food security. We cannot import all our food, and future generations need land to grow food on. Our concern is heightened in scale by the fact this is only the first phase of a much larger undertaking, threatening Green Belt to a very significant extent, which is a nationally important designation and there are other material considerations and harms, which I will set out below.

A clearer understanding of the spatial distribution of BAE Systems existing work force would help better understand where people travel to work from as it is likely the new houses would not be ring-fenced to local jobs and therefore commuting would in reality occur from external geographies such as the Greater Manchester and Liverpool City Region areas. More information would help to persuade CPRE that there is a justification for the development.

Similarly, CPRE queries the assumptions underpinning the infographic for socio-economic benefits, leading to overclaiming construction, operation stage and overall gross value added benefits, as the situation is rather different due to ongoing economic uncertainty. Council Tax contributions ought to be kept out of the weighing of benefits as it could have the effect of 'buying' the Council's grant of approval, which would be a clear conflict of interest. CPRE wants all of Lancashire to prosper, but this should be through strategic local plan making and not on an ad hoc basis. The proposal would undermine the Central Lancashire local plan process and that of neighbouring authorities.

Net Zero

CPRE understands that Story Homes proposes latest sustainable technologies to enable a carbon neutral development in terms of building design but developing sites in rural places at a distance from urban centres has the result of inducing car journeys and leads to more car dependence. Relying on electric vehicles is not satisfactory as currently there is not enough infrastructure, and the cost of vehicles is prohibitive.

CPRE notes the A59 is served by some bus services, but whether there are adequate frequency to enable work patterns and access to schools and other essential services is a moot point. CPRE is supportive of

more walking and cycling being designed into needed new development, and would welcome more public rights of way. Although a park and ride facility could support more sustainable travel, the physical impact of 500 parking spaces would harm the rural landscape character as a permanent built incursion into an area of current green fields.

Ecology

CPRE is pleased to learn existing woodland such as Walmsley Fold Wood and Huntley Wood will be retained, however is not persuaded at this stage that the development of the land for housing, employment and other land uses will lead to enhanced green infrastructure, sustainability and environmental benefits at the scale suggested. The land performs important ecosystems services with diverse wildlife corridors, habitat and green links that should be protected in the future. CPRE would wish to see more tree and hedgerow planting to help deliver climate emergency and nature recovery action.

The proposal does not support the South Ribble Local Plan Policy G7, Green Infrastructure as alternative facilities of a similar nature have not been proposed elsewhere for the community to access, and the site would detrimentally affect the nature conservation on the site. The Parish Plan (2021) also shows the interest the community is taking in this biodiverse area, including the forming of farming groups, a civic society, tree planting, and the regular recording over the last 20 years of biological records. These records are present on the National Biodiversity Network (NBN) and Magic Map. The NBN atlas, the hub of biological records in the UK, has records on the proposed sites of birds, amphibians, mammals, and plants, some of which are protected, such as Great Crested Newts. Others are facing national declines, such as the Common Toad. Defra's Magic Map also notes the Great Crested Newt records across the site.

The NBN atlas shows mammal recordings of bats, roe deer, otters, foxes, and moles on the site. Above all, the site is littered with regular recordings of diverse species of birds, particularly species of national concern. These recordings are across the last 20 years and are from resident BTO recorders, LERN recorders, and from the Bird Conservation Targeting Project. They include Cetti's Warbler, Little Egrets, Water Rails, Marsh Harrier, Avocet, Willow Tit, Little Tern, Lesser Spotted Woodpecker. These birds, many of which have faced critical national decline, have been spotted on these proposed sites repeatedly, over the last 20 years. This does not just show a variety of birds, but a level of biodiversity that is of national significance. Since 1970, the farmland bird Grey Partridge has declined by over 90%; the woodland birds of Lesser Spotted Woodpecker and Willow Tit have declined more than 80%; while upland birds Curlew and Common Sandpiper declined by more than 50% (BTO, 2022). All these birds have been recorded on the proposed site, on several occasions, across the last 20 years.

Defra's Magic Map corroborates this data: the site is covered by Priority Species Areas for Curlew, Tree Sparrow, Grey Partridge, Lapwing, and Redshank. Defra's Magic Map also labels the site a Farmland Bird Indicator area, due to the consistent sightings of certain farmland birds which are a sign of valuable biodiversity. In addition, Defra's Magic Map shows part of the site is covered by a National Habitat Network Expansion Zone.

Lancashire Wildlife Trust and other environmental organisations should be engaged in the Environmental Impact Assessment (EIA) Scoping Opinion to help better understand environmental issues when evaluating the potential environmental impact of the scheme. The Environmental Statement (ES) should be validated by a third party who does not have a conflict of interest in the land value uplift or council tax revenue should the land be granted planning permission. It is important to make sure the baseline is accurately recorded at the early stage and its value not underplayed. The future impacts must also not be exaggerated. There has been degradation of our environment for decades and nature must be more highly valued and recovered to avoid continuing species collapse.

Landscape and Visual Impacts

The effects of such a major development and the prominence of the large site should be fully considered. CPRE has long campaigned for South Ribble's countryside to be protected and enhanced as new development is planned. The area is rural, and the Garden Village would have an urbanising effect to a very large magnitude on a permanent basis. A lot of vehicle traffic will be induced with noise and visual disturbance.

The visual impacts to existing public rights of way such as the Guild Wheel Route would be harmful.

Flood risk

The consequence of hard landscaping and development on the local flood risk would need to be properly assessed to ensure that run off and natural capital value of greenfields enabling water to soak away more slowly. The Ribble Rivers Trust should be consulted and the Wildlife Trust due to the Brockholes Nature Reserve being impacted.

Economic Benefits

CPRE is not persuaded by the level of socio-economic benefits claimed by the developer:

- The range is focused at the more affluent executive and larger family housing, and this does not reflect needs as set out in the housing evidence base of the local plan.
- There are employment opportunities claimed but CPRE is concerned at the growth assumptions of the evidence base in light of economic uncertainties arising from Brexit and Covid.
- The additional local expenditure as residents move to the area should be focused in existing urban areas and in line with site allocations identified in the local plan.
- Development decisions should not be incentivised by additional council tax payments – this is a clear conflict of interest.

Lack of local amenities

The sites within the proposal are in the Samlesbury and Cuerdale parish. This parish has no GP surgery, dental surgery, railway station, library, high school, or supermarkets. It has one grocery store at Huntley's and a lack of newsagents. It has one primary school. The Esso garage, the only petrol station, has no mention on its site of an electric vehicle charging point.

The proposal does not offer sufficient coverage to compensate for the absence of all of these amenities. This proposed garden village is of a high scale that would add pressure to the GP surgeries, single primary school, and the high school in Walton Le Dale.

The main roads running along these proposed sites are A59 and A677, both fast roads. These are not safe routes for cycling or walking, ruling out these sustainable commuting options.

The Stagecoach number 59 bus runs from Preston to Blackburn along the A59. The bus stops at Ticked Trout, requiring residents to walk the A59 and traverse the motorway junction to access the bus route – this is not safe. The alternative bus, the 280 Preston – Clitheroe – Skipton bus, would require residents to walk to the next village Mellor, and access a route which is once an hour – inadequate provision.

The current bus, cycling, pedestrian, and electric vehicle provisions are not suitable to make it viable for the residents of this proposed Garden Village to commute anywhere in a sustainable way. It would add

car numbers to an already congested route.

The proposal of a park-and-ride only strengthens the use of cars at the expense of sustainable travel for Lancashire.

Developer obligations

New services and facilities to meet local needs arising from the level of development should be secured in accordance with NPPF paragraph 58.

Local Opposition

The Localism Act 2011 brought a local dimension to planning decisions. There is significant local opposition to the development of a Garden Village including Samlesbury Residents Forum, Save Samlesbury from Mass Development Action Group. This opposition would have to be provided with negative weight in the planning balance. The three-week consultation period occurred over the school half term when many people may have been away and is in any case much too short in CPRE's opinion for such a major proposal. Many local stakeholders will not have had the chance to respond in these circumstances.

Summary

At this stage, it is CPRE's opinion that the negative impacts outweigh the benefits. CPRE reserves the right to consider the details of an outline application if submitted. The full impact of the Samlesbury Garden Village must be considered against planning policies as expressed in the National Planning Policy Framework, 2021 and the Development Plan.

If you have any questions concerning the above, please do not hesitate to contact me.

Yours sincerely

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Planning Manager