



**Blackburn with
Darwen
Local Plan**
Publication Stage
Representation Form

(For official use only)
Contact ID:

Rep ID:

Name of the Local Plan to which this representation relates:

Blackburn with Darwen Local Plan Regulation 19 (February 2022)

Please return to [email: forwardplanning@blackburn.gov.uk, or post to: Strategic Planning, 3rd Floor, One Cathedral Square, Blackburn, BB1 1FB] BY 5PM ON FRIDAY 18TH MARCH 2022

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text"/>	Ms
First Name	<input type="text"/>	Jackie
Last Name	<input type="text"/>	Copley
Job Title (where relevant)	<input type="text"/>	Planning Manager
Organisation (where relevant)	Guide and Belthorn Protect Our Green Belt Group	CPRE Lancashire, Liverpool City Region and Greater Manchester
Address Line 1	<input type="text"/>	Acres Brook
Line 2	<input type="text"/>	Sabden
Line 3	<input type="text"/>	Higham
Line 4	<input type="text"/>	Lancashire
Post Code	<input type="text"/>	BB12 9BL
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	protectourgreenbelt@yahoo.com	jackie.copley@cprelancashire.org.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

3a. Does your comment relate to:

Local Plan	<input checked="" type="checkbox"/>	Sustainability Appraisal	<input type="checkbox"/>
Habitats Regulations Assessment	<input type="checkbox"/>	Policies Maps	<input checked="" type="checkbox"/>

3b. To which part does this representation relate?

Paragraph	<input type="checkbox"/> Page 165-167	Policy	<input type="checkbox"/> E179	Policies Map	<input checked="" type="checkbox"/>
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4. Do you consider the Local Plan is:

4(a) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4(b) Complies with the Duty to Cooperate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4(c) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. With regard to each test of soundness, do you consider the Plan to be sound or unsound:

5(a) Positively prepared	Sound	<input type="checkbox"/>	Unsound	<input type="checkbox"/>
5(b) Justified	Sound	<input type="checkbox"/>	Unsound	<input checked="" type="checkbox"/>
5(c) Effective	Sound	<input type="checkbox"/>	Unsound	<input checked="" type="checkbox"/>
5(d) Consistent with national policy	Sound	<input type="checkbox"/>	Unsound	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Policy E179 Strategic Employment Site proposed in the Submission Version Local Plan is not sound because it is not justified, not effective and not consistent with national policy for the reasons identified below.

The Site

The site is situated in the parishes of Yate and Pickup Bank, West Pennine ward, and comprises 22.02 hectares of agricultural fields split between two sites, Site 1 north of Haslingden Road and Site 3 to the north of School Lane. There is a Site 2 which is proposed for safeguarding between Site 1 and Site 3.

An application for an Environmental Impact Assessment Screening Opinion was registered on 23rd February 2022 for an employment development comprising circa 70,000sqm floor space of use classes B2 and B8 and supporting ancillary uses, such as trade counters on Site 1.

Employment land need

To avoid duplication, the Guide and Belthorn Protect Our Green Belt group echoes the comments made by CPRE Lancashire, Liverpool City Region and Greater Manchester concerning the level of employment land identified as too high. There are issues of Duty to Cooperate to consider with adjacent local planning authorities and concern that an oversupply of employment land, however well intended, could lead to adverse economic, social and environmental impacts. A reduced employment land requirement means the land included in Policy E179 is not required and it should be deleted from the local plan.

Green Belt Harm

Even if the need to release some land from Green Belt is properly justified the impact of releasing this parcel of land on the purpose of Green Belt and its functions are considered as insurmountable due to the planning harms that would arise. The land is currently within the designated Green Belt covered by Policy 3 Green Belt of the adopted core strategy 2015.

Blackburn with Darwen only has 40% of its land remaining in the designated Green Belt. Locally Green Belt loss is vociferously opposed, and when the M65 was developed the Council previously agreed not to breach the East of the M65 causing loss of Green Belt land as it was accepted the M65 provides a strong defensible boundary. Local people would no longer trust the planning system if this planning principle is not supported in the local plan.

It is important to refer to National Planning Practice Guidance and to consider What factors can be considered when assessing the potential impact of development on the openness of the Green Belt? Paragraph: 001 Reference ID: 64-001-20190722 Revision date: 22 07 2019. It is the judgement of our chartered planner that as well as definitional harm, there is also spatial and visual harms arising. The duration is permanent, and the land would not return to its original state. There would be a very large increase in the activity at the location, which for the reasons set out below is unsuitable.

Therefore, the extent of harm to Green Belt would be described as significant and as such contrary to the planning policies at the national and local levels.

The removal of this land would be contrary to Local Plan Policy PAP1: Green Belt.

The Council must value the aim of keeping land permanently open and for performing the five key functions of:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The site performs functions (a), (b), (c), and (e) to a significant extent.

If developed the site would lead to unacceptable sprawl and lead to future development pressure at the boundaries of the site that would be difficult to control as the hard boundary of the M65 motorway is breached to the east. The area is otherwise free of inappropriate development save a number of small miners cottages that are washed over by Green Belt.

Guide Village was previously rural in nature and is already densely developed. The neighbouring areas of Guide in Blackburn that is currently distinct from the village of Belthorn in Hyndburn would become merged as properties coalesce in a visual and spatial sense. Ultimately the Green Belt between Blackburn and Accrington would be eroded against purpose (b). It is understood that land agents are already contacting land owners adjacent to the Sites.

There would be unacceptable countryside encroachment from prominent large B2 and B8 sheds at this important moorland fringe location. If developed the countryside would be threatened by future encroachment.

Development of the land proposed by Policy E179 would hamper regeneration proposals of the Local Plan in Blackburn with Darwen. The Council should first focus on the sites contained in the Brownfield Register and better understand what action and investment is needed to bring forward 'unsuitable' sites. Bringing forward greenfield sites will hamper regeneration in the Borough and elsewhere including strategic plans of neighbouring authorities and the Lancashire Local Enterprise Partnership.

It is considered for strategic employment sites there must be evidence of effective cooperation with neighbouring authorities as there is considerable employment land being brought forward across all authorities in the neighbouring areas this is contrary to NPPF paragraph 25.

Cumulative impacts need to be considered from major new residential development in the surrounding area, including the Blackamoor area and development already underway in Guide and elsewhere in Blackburn with Darwen and surrounding areas, including Rossendale.

To demonstrate exceptional circumstances, the harm to Green Belt should not be insurmountable, and importantly there should be evidence that other sites have been given proper consideration as alternative sites.

In the evidence base 64a report by Turley the Section 9 on Consideration of Reasonable Alternatives does not provide compelling evidence of the availability of other suitable land first within the area. Shadsworth, Whitebirk and Walker Steel already provide for such logistics, and/or the sites proposed for major housing development could accommodate employment development as well and not incur

the same level of Green Belt harm. Also consideration of land outside in localities such as Hyndburn and Rossendale should be exhausted as part of the requirement for Duty to Cooperate. This is an important aspect of local plan making. The local plan evidence base must consider the availability of suitable alternatives.

Traffic Issues

Exposed moorland location

The B6232 experiences extreme conditions due to the moorland fringe location with a particular climate impacted by high winds, high rainfall, ice, snow, and other issues leading to frequent closures. There is concern that additional traffic will be induced on a road that cannot deal with the capacity. Access to the site 1 and 2 utilising this stretch of highway is likely to be frequently disrupted in winter months.

Highway Safety

Public health and safety ought not to be outweighed by the claimed economic benefits. Pedestrian access to site 1 & 2 is problematic as people would have to navigate the steep inclines to overcome the graded nature of the area and the footbridge over the M65 motorway. There is no footpath to Site 1 from the M65 junction 5 roundabout, the Transport Study states, "the steep gradient on B6232 Haslingden Road from junction 5 eastbound to the SES site frontage is likely to discourage journeys by non-motorised users, and the development proposals for the site will not seek to encourage journeys by this route" however alternative footpath access via the footbridge is steeper in gradient. <https://blackburn-darwen.org.uk/wp-content/uploads/E66-Strategic-Employment-Site-Transport-Study-2021.pdf>

Due the geological nature of sites 1 & 2, pedestrian access would be particularly inaccessible for people with access issues such as those with underlying health issues (heart disease, respiratory disease, etc), the elderly as retirement age is increased in future years and the disabled. The compliance of the site access in terms of the Equality Act 2010 should be considered. These points are not made in the WSP report. The Policy E179 makes no provision to enable accessible pedestrian journeys for all.

The steep incline frequently causes disruption to traffic flows as HGV wagons cannot climb at speed and this leads to other motorists overtaking in frustration, which is very dangerous for on-coming traffic, and it is a known dangerous spot and it also has the effect of causing queuing traffic on the slip road of the M65 carriageway.

There are problems of highway safety on the B6232, which is split into three parts with three different road names (Haslingden, Elton and Grane). As the stretch of B6232 is continuous the accident statistics need to be considered for the road in combination as to give a combined total. People traveling from Haslingden /Rossendale /Manchester /Bury to the site would need to travel the whole stretch of this highway.

In the last 17 years there have been 12 fatalities, 30 accidents with life changing injuries and 180 other accidents recorded. Yet, the WSP study records 80 Personal Injury Incidents in the past five years, but no deaths are identified due to the limited study area. The full collision data for the B6232 ought to be considered otherwise, decision makers are not fully aware of the dangers and the suitability of the site from a traffic safety point of view.

The access for Site 1 and Site 2 is considered too inclined for HGV access, particularly in winter weather with snow and ice. Significant danger is posed by

the steep gradients, bends and camber of the road. The road has differing 30mph, 40mph and 50mph speed limits applied at different stretches to try and reduce speeding traffic which causes treacherous driving conditions.

In 2017 speed cameras were installed in eight of Lancashire's most dangerous roads. The B6232 was one such road. The local press has reported frequently on the dangers, "New figures exclusively revealed to the Free Press under the Freedom of Information Act show that 9,921 motorists have been caught" (Lancashire Telegraph, March 2018) in the first 3 months that the B6232 Grane Road's average speed cameras went live and the B6232 "Grane Road in Haslingden has netted the most - a colossal 63,992 - according to the Lancashire Road Safety Partnership which installed the cameras" (Lancashire Post, 13 January 2021).

Currently, the traffic regularly backs up on the M65 in both directions. This is incredibly dangerous given that the carriage is unlit, particularly in winter in an area that suffers from poor weather conditions. The masterplan includes provision for a roundabout with traffic lights to control access but there is concern this will only lead to further queuing on the M65 motorway, which would be dangerous.

The highway authority must ensure all the known problems are considered when considering whether the site 1 and site 3 can safely be developed with the prospect of the safeguarded site 2 coming forward later, which will only increase traffic and add to what is already a dangerous stretch of moorland road.

Confirmation has been received from the Highways Agency (14.03.2022- Warren Hilton, Assistant Spatial Planner) that the councils transport evidence base has not yet been fully completed or agreed. As highlighted by the Highways England this is a requirement at local plan stage:

"It is important to note that junction 4 and 5 of the M65 operate under considerable pressure and therefore suffer from congestion at peak times. This is particularly evident at junction 5. Blackburn with Darwen Council is aware of Highways England's concerns that the regular queuing back of traffic from the junction circulatory to the mainline motorway carriageway is likely to start to occur regularly during the next few years. Capacity enhancements and the infrastructure required to deliver sustainable strategic growth should be identified at Local Plan stage and not at Planning Application stage"

Given that this plan is now proceeding to review by the planning inspectorate they council have not discharged this duty as required; it appears that they are operating on a wait and see basis and this is unacceptable given existing problems.

Modelling flaws

The road is a busy commuter route and is heavily used by people between Blackburn and Haslingden. In 2013 a traffic survey carried out by the Highways Authority recording daily trips of 14,000 (7,000 in both east and west direction). This increased by 2%, in line with Government accepted growth figures then the estimate daily trips will be more than 16,000 trips on what is a very narrow winding country lane unsuitable for such levels of traffic.

The Baseline Traffic Analysis in the Blackburn with Darwen Borough Council M65 Junction 5 Strategic Employment Site Transport Study appears to be misleading partly because the traffic flow figures and accident figures for the whole of the B6232 do not seem to appear within the surveys conducted.

The Council in the local plan supporting documents does not record the significant issues concerning the B6232, particularly concerning access arrangements as it

directly links to Site 1 and Site 2, which are the largest parcels of the strategic employment location.

Traffic Congestion

The surrounding highway infrastructure is congested - the Grane/Elton/Haslingden Road area, Belthorn village, Junction 5 roundabout, Guide and Blackamoor, are seriously congested, causing a bottle neck at particularly at peak times. Queuing traffic leads to dangerous overtaking as cars try to beat HGVs to or from the roundabout junction.

Any development currently undertaken to the highway in Guide and surrounding area ought to improve and alleviate the current problems with traffic. Local people are concerned that the local network is not capable of withstanding an increase in vehicle numbers of this scale, particularly commercial vehicles, with over 2,700 full time employees envisaged over the three sites, inclusive of the safeguarded area. Additional servicing vehicles would need to be factored in, such as delivery drivers. The development of safeguarded site 2 should be factored in as if sites 1 and 2 are completed the development pressure would be very difficult to withstand at the end of the plan period.

The level of congestion causes serious concerns with regards to access for emergency vehicles, particularly ambulances accessing Royal Blackburn Hospital (approx 5 mins away from proposed site) to the North West, which would have to travel and navigate much higher levels of commercial traffic causing delays and a risk to patient safety. This is a large teaching hospital which offers a full range of adult and child services.

Traffic congestion will be exacerbated further by high levels of new residential development in the surrounding area (e.g., Blackamoor area and development already underway in Guide and in Rossendale).

The road network is at capacity. Lorries may queue to access the site from the M65 on a steep gradient and are likely to slide in bad weather when there is ice and snow, in an already congested area. Local people already have experienced such occurrences.

Blackburn with Darwen has submitted an expression of interest to the Department of Transport's Local Pinch Point Fund 2021/22 and 2022/23. This relates to growth ambitions, but primarily to address current peak traffic congestion. The expression of interest was unsuccessful.

School lane is a narrow B-road, bounded on both side by residential, it is totally inadequate of servicing a large SES site such as site 3, large wagons accessing the site during early hours would impact demonstrably on the resident areas of School Lane, Copster Green and Swallowfield's due to pollution and noise servicing the site during the early hours. This is demonstrated by previous planning applications being refused along school lane, (see extracts at the end of this representation document).

Weight restriction

Heavy Goods Vehicles (HGVs) are unsuitable on the B6232. This is extremely problematic given that the main site entrance for site 1 and 2 is proposed to be located on this road.

There is a weight restriction on 7.5 tonne vehicles on most of the B6232 across the moorland, except for the first 100m east of where the main site is proposed. However, this lack of a weight restriction for the first 100m results in HGVs frequently using the remainder of the B6232 in breach of the weight restriction.

Residents are concerned about a failure to enforce and prevent HGVs from using the stretch of this B6232 highway which is unsuitable for heavy vehicles. The weight restriction is for safety and if adhered to also leads to benefits for tranquillity and enjoyment by humans and wildlife alike.

The proposed site access is likely to lead to an increase in the problem as drivers (being human and prone to error) navigate unfamiliar routes and Satnavs send them over the road. The WSP report fails to mention the weight restriction, and this is a significant omission leading to a misrepresentation of traffic flows at the current time and in the future.

Sustainable Travel

The policy E179 falls short of the guidance issued in August 2019 by the Chartered Institution of Highways & Transportation (CIHT) titled Better planning, better transport, better places, calling for decision makers to put greater weight on transport and movement related evidence, giving regard for the sustainable travel plans when planning how land is used in the future.

The site is exposed to the weather elements and is considered by local people not to form a suitable option for people who wish to walk or cycle. The bus services are not frequent or reliable enough to provide an option for employees to the site. The development would not properly integrate sustainable travel modes and would be dominated by private road vehicles for staff and commercial vans and HGVs to service the site. Policy E179 is contrary to NPPF paragraph 85 in that the location is neither sensitive to its surroundings, is not well served bus public transport and it does have an unacceptable impact on the local roads and due to the harsh weather conditions and steep inclines is unsuitable, indeed dangerous to drivers, cyclist and pedestrians and inappropriate at the location.

In terms of site 1, earlier comments in relation to accessibility are re-iterated. Site 3 to the north is served by a narrow pavement to the north of B6231 School Lane, which is considered unsuitable for people accessing the site. E179 is not well integrated in the context of NPPF paragraphs 94 and 95 and it would not be accessible to other community facilities or amenities, and it would not support regeneration.

The only form of public transport close to Site 1 entrance on the B6232 itself is the number 481 bus service, which is unreliable due to frequent disruption from road closures because of poor weather and impossible driving conditions. Site 3 is served by the number 15 bus service on the B6231 School Lane, which connects Clitheroe to Royal Blackburn Hospital with a frequency of approximately every hour and a half.

Residents have put together a supplementary report relating to the issues concerning highway safety discussing such areas in detail and is attached as Annex 1.0 to this report.

Environmental Issues

The site is in a grassland area at the moorland fringe with environmental designations and is an important natural capital asset with functions supporting climate resilience, nature recovery through biodiversity net gain and supporting good health and well-being by providing space for people to exercise in natural environments. The site is served by several tracks and public rights of way.

Air Quality

The site is within proximity to the Blackburn Air Quality Monitoring Area 6 – Blackamoor. In addition, there are 2 Non-Automatic Monitoring Sites DT4 at 238

Blackamoor Road and DT5 283 Haslingden Road. There is also an issue of air quality exceedance at the Rossendale end of the road.

A report went to Rossendale's Cabinet Committee On 10th November showing that traffic pollution at various points along Grane Road in Haslingden has been recorded and the level of nitrogen dioxide (NO₂) from vehicles is higher than Government objectives. In 2020 there was generally a clear reduction in NO₂ overall due to the Covid lockdowns and reduced traffic movements however two diffusion tubes locations still recorded NO₂ above the Governments annual limit of 40µg/m³. The tubes where tube 12 located at 250 Grane Road Haslingden which recorded 44.9 µg/m³ and Tube 19 located at 256-8 Grane Road Haslingden which recorded 41.6 µg/m³. N.B. This is the first year they've been in this location after relocation at the start of 2020. An AQMA was declared, and it was agreed that action needs to be taken on the Grane Road, which runs between Rossendale and Blackburn, which could include a 30-mph speed limit being imposed along the whole route. Speed restrictions could be used to discourage traffic and divert drivers onto routes further away from households.

Policy E179 proposed a land use that would undoubtedly increase the level of traffic along the B6232 and would place an inappropriate exceedance of air pollution, albeit in Rossendale, above and beyond Government national targets.

Ecology

It is considered that the proximity of the site to the designated West Pennine Moors Site of Special Scientific Interest (SSSI), SSSI Impact Risk Zone and Moorland Line, as shown in the Defra Magic Map (see Extract at the end of this submission), along part of in proximity, which are important for biodiversity of rarity, feeding and breeding of various species and the sequestration of carbon.

The peat mossland is understood to be deep peat. Peat moss is scientifically proven to be a significant natural store of carbon. Nationally, The Climate Change Committee recommends 79% of peatlands should be restored by 2050 to support the Government's international legally binding commitments on climate change. The Council declared a Climate Emergency in July 2019 and committed to being carbon neutral by 2030. If development occurs it will lead to additional vehicle activity on the B6232 across the mossland and could threaten to further degrade this precious resource. We need to adopt a precautionary principle.

Unfortunately, the SSSI is already shown to be at the three levels of unfavourable with the area nearest the proposed allocation shown in orange as no change. Loss of greenfield land at this location and developing a land use that will substantially increase the road traffic volumes on the road is considered inappropriate given the unfavourable condition of the SSSI, especially as the area of unfavourable declining, in red, is within proximity and additional traffic would further degrade this important natural asset.

There would be negative impacts on the wildlife within and near to the site if allocated for development. Some species and habitats are red listed species. As outlined in earlier submissions the moorland fringe grassland and woodland provide important habitat for breeding birds including Merlin, Curlew, Snipe. There are over 30 pairs of nesting lapwings (red list) which will be unable to nest close to the tall structures as they are vulnerable from attack by predators. Farm bird species are particularly vulnerable to further decline in the area. Hares oyster catchers, barn owls, deer and starlings also have been observed on the farm fields.

Natural England needs to be consulted and an independent assessment of the impact verified for the development effects on the important environmental designations including the moorland peat mossland, and the West Pennine SSSI.

The Environment Act 2021 requires a minimum 10% additional Biodiversity Net Gain (10%+BNG) to be achieved.

There is extensive cover of pleurocarpous mosses, namely Springy Turf-moss (*Rhytidiadelphus squarrosus*) alongside plants such as Field Wood-rush (*Luzula campestris*). Pink Waxcap which is recorded nearby which qualifies this area as 'irreplaceable habitat'. As per the National Planning Policy Framework (para 180), development resulting in the loss or deterioration must be refused. There are areas of unimproved acid grassland, qualifying this land as a Habitat of Principal Importance.

Loss of any Habitat of Principal Importance must be avoided, mitigated or as a last resort, adequately compensated for. Development of this greenbelt site must be refused NPPF paragraph 180.

Areas of dry-stone wall support reptiles, namely common lizard. All native reptiles are protected by law. Surveys to ascertain presence or likely absence of reptiles should therefore be undertaken. Where reptiles are impacted by any prospective development, mitigation or compensation measures must be implemented.

Tranquillity loss

The area is comparatively tranquil and enjoyed by people as well as wildlife for health and well-being benefits. The development of the sites will induce significantly more vehicles and operations with all the noise, vibration, and visual impacts. The area enjoys relatively dark skies and the addition of the Strategic Employment Site will add artificial night lighting and this will cause harm to the area.

Local Character

Currently the green fields are used for farm pasture and provide a predominately rural character with natural features of hedgerows and bushes at the field boundaries. Although in proximity to Blackburn existing industrial area the sites are free of manmade intrusion, except for sparse built features some of a historic nature including farm buildings, small miner's cottages and drystone walls for keeping livestock that add to the local distinctiveness.

The motorway is hidden from view due to being sunken in the landscape with large scale earth bunds to the north and west. There is a national grid power line crossing proposed safeguarded Site 2. Please refer to the Extracts from Google Map Street view at the end of this submission that show the rural reality of the local character in the area and do visit the area.

The development of large industrial buildings would be incongruous with the surroundings and would be harmful to near and distant views from as far afield as the Forest of Bowland and the Yorkshire Three Peaks. Policy E179 is contrary to NPPF paragraph 85 in that the location is not sensitive to its surroundings.

Policy E179 includes provisions for landscape character, such as to maintain the drystone wall features, whilst it is understood to be well intended it is considered in the context of the very large scale of development, they will be not stop the imposition of very large intrusions into the Green Belt causing significant harm to the landscape character and causing permanent and significant visual adverse impacts.

Minerals Safeguarding Area

The site is within a MSA and there are mine shafts on the site from previous mineral operations. There are issues of land stability and therefore advice on how to ensure that development is suitable to its ground condition and how to avoid

risks caused by unstable land or subsidence is required. For example, the Coal Authority would need to ensure the land stability issues are not insurmountable, as set out in PPG Paragraph: 002 Reference ID: 45-002-20140306 Revision date: 06 03 2014 Waiting until the masterplan stage to understand the physical considerations of the site seems late in the process.

Key Development Considerations

The E179 has 11 requirements concerning a number of mitigations to overcome a number of the Transport and Environmental issues that are raised. The design, mitigations and compensations are not considered adequate to overcome the harms and hence the case to delete the E179 Strategic Employment Site in entirety.

Local opposition

NPPF paragraph 15 sets out that "The planning system should be genuinely planned" but talks of them being a "platform for local people to shape their surroundings".

Inclusion of Site E179 is expressly against the wishes of local people. There were some 400 objections to the inclusion of the site at the previous local plan consultation stage.

The method of commenting for the Regulation 19 consultation although understood to be standard, may have precluded local people from commenting.

(Continue on a separate sheet /expand box if necessary)

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 6 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The two sites of Site 1 and Site 3 should be deleted in their entirety from the Local Plan as a proposed allocation for a strategic employment site.

The proposed safeguarded land at Site 2 should also be deleted from the local plan.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

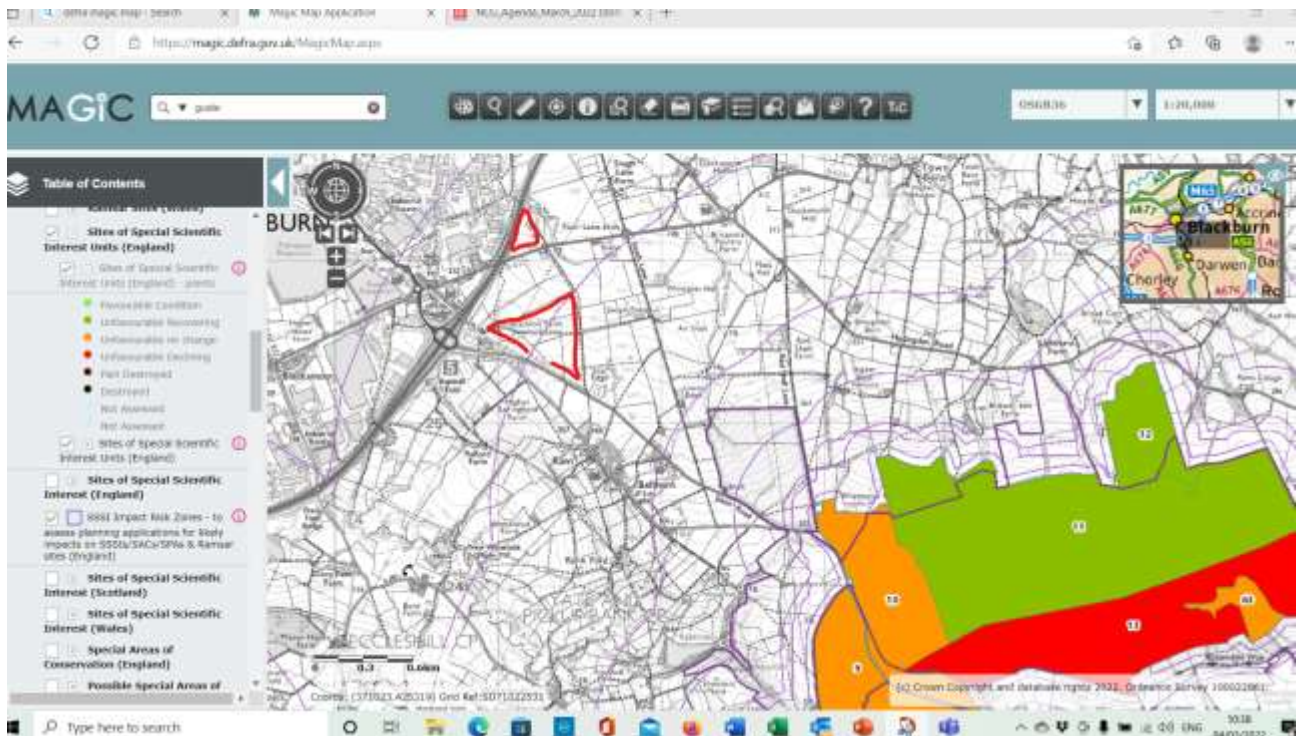
9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The local Guide and Belthorn Protect Our Green Belt Group would like to be represented by a chartered town planner in a public hearing to articulate the planning case to have the site deleted from the local plan.

There are local people with an interest who previously raised concerns that they consider have not been fully heard by the local planners and they want to ensure the local planning issues and foreseen problems are fully understood at the examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Extracts from Defra Magic Map showing red site boundary with the Moorland Line shown in dark purple and the location of the SSSI Impact Risk Zone in light purple.



Extract from Google Maps in Street View looking North East from the B632 (to the south east of Belthorn Junction) onto the proposed Site 2.



Extract from Google Maps in Street View looking North East on School Lane into proposed Site 3.





Refusal Reasons Page for Planning Application - 10/19/0931

Site Address EP Properties Ltd School Lane Guide Blackburn BB1 2QR

Details

Application Number 10/19/0931

Site Address EP Properties Ltd School Lane Guide Blackburn BB1 2QR

Property Address Street Record, School Lane, Guide, Blackburn

Reasons 1

The proposed car park and car park extension, by virtue of a lack of oversight of the management plan for the accessing, manoeuvring, parking and exiting from the site, introduces conflict into the overall function of the area through an unacceptable level of vehicle noise, fumes and movement where the industrial area borders the residential areas of School Lane and Copster Hill Close, contrary to Policy 14 of the Blackburn with Darwen Borough Local Plan Part 2 (2015).

Reasons 3

The proposed car park extension, by virtue of the removal of the grassed landscape zone between the boundary with the highway and the original car park and its replacement with handstanding and additional parking, fails to understand the context and adjacent residential use through loss of visual amenity and introducing the prospect of noise, fumes and manoeuvring of vehicles closer to the dwellings on School Lane and Copster Hill Close, contrary to Policies 11 and 8 of the Blackburn with Darwen Borough Local Plan Part 2 (2015).

Reasons 2

The proposed car park and car park extension, by virtue of the failure to include an effective scheme to regulate its proposals, demonstrates a failure to understand the wider context thereby causing harm to the amenity of the area through the potential for haphazard parking, illicit use of the School Lane entrances, and manoeuvring of commercial vehicles outside the prescribed hours of operation, contrary to Policy 11 of the Blackburn with Darwen Borough Local Plan Part 2 (2015).

Planning Explorer

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- ▶ Property search
- ▶ Planning Appeals
- ▶ Useful links



Refusal Reasons Page for Planning Application - 10.93/1588

Site Address Shadsworth Distribution Centre, School Lane, Guide, Blackburn.

Details

Application Number 10.93/1588

Site Address Shadsworth Distribution Centre, School Lane, Guide, Blackburn.

Property Address

Reasons 51

The proposed use would result in a loss of amenity to the occupiers of adjacent houses as a result of the noise generated in the operation of the holding area at night time when the ambient noise level is low.

Reasons 52

The use of any part of the land to the south of the building for commercial vehicle operations would make it difficult for the Local Planning Authority to control or to resist further applications, an intensification or an expansion of the operation, or for the use of the School Lane access by commercial vehicles. Such intensification, expansion or use would have an adverse effect on the amenity of the adjoining

Other Information Available for Planning Application - 10.93/1588

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