

Objection to Planning Application 20/01347 relating to Land to the North of Town Lane, Whittle Le Woods.

Objector : Whittle Le Woods (Town Lane neighbouring land) Residents' Association.

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1. Introduction and Summary of Objection

Introduction

This objection to Planning Application 20/01347 is made by Whittle Le Woods (Town Lane neighbouring land) Residents' Association. It is supported by many other residents of Whittle Le Woods with whom it has been shared.

The application comprises a significant number of documents which we have carefully considered. In order to provide clarity, our objection is structured around the 'Design and Access Statement' (DAS) provided on behalf of the applicants by Cass Associates. We will summarise our points of objection in the remainder of this Section 1, and then amplify and support them in Section 2 which provides a critique of, and mirrors the structure of, the applicant's DAS.

Summary of Objection

As we will demonstrate, the proposed development is inappropriate on several grounds including scale, style, and lack of social and environmental sustainability. The application for outline permission should be refused by Chorley Borough Council. We understand that the subject land has previously been identified as suitable for future development by the Council. However, it is our contention that, if such development is to take place, it should be at much smaller scale, retaining more of the land in its current open character, and be progressed in the future ONLY when the local infrastructure is better able to provide services for the increased population.

In contrast to the claims in the applicant's DAS, we submit that:

- Contrary to the DAS's assertion, the proposal does not provide 'mixed' development. It comprises large, detached villas with the minimum acceptable high density (affordable?) housing crammed into the least favourable area of the site.
- The design, as far as can be gleaned, does not respond to the local area in terms of townscape or design. This echoes Redrow's 'standardised' approach nationwide (see Appendix 1).
- Journeys from the site will largely be by car. The DAS assessment of its foot and cycle connectivity is based on underestimated measurement of distance, ignorance of footpath suitability and optimism of propensity to walk, cycle or use the infrequent bus service.
- The assessment of journeys, including at peak time, seems significantly lower than that which would normally occur with a development of this size.
- The only point of access is onto Town Lane, which has several points of restriction, which we detail below. Several structures along Town Lane, including a narrow canal bridge, are listed and the whole road has a 7.5 tonne weight limit. This will prove problematic in both the construction and the occupancy phases. Other local roads which may become 'cut-throughs' are unsuitable and will compound the problem.

- Contrary to Redrow's assertions, the site shows considerable capacity for wildlife (see Appendix 2) much of which would probably be reduced if the development proceeds at the proposed scale.
- The effects of the development on areas already prone to flooding is likely to be severe. The incidence of extreme rainfall events is likely to increase and the excess run-off AT THESE TIMES is likely to exacerbate current risk to Waterhouse Green, just downstream of the site. Appendix 3 provides details of recent flood alerts and warnings.
- Infrastructure in Whittle Le Woods is currently inadequate to support the present population, especially in terms of school spaces and healthcare, and will be even more so if a development of this scale proceeds.
- Foul sewage would use the existing network along Town Lane. The same applicant also intends to connect the new properties at Croston's Farm to this same pipe. We believe this is likely to overload the system and cause issues.
- Redrow's record on developing properties that provide environmental sustainability is poor – though the DAS pays lip-service to this there is no indication that they will deliver anything over the statutory minimum in this field. This will do nothing to help meet the Government's Climate Change targets
- The issues raised at previous community meetings, planning consultations and Redrow's own inadequate pre-planning consultation have not been addressed.
- The nuisance from noise and air pollution from the M61 has not been adequately addressed.
- The plans include 'areas for future development'. This would increase all of the issues that cause problems with the site, as well as being very close indeed to the M61.
- The proposed footway / cycle-path connection to Town Lane is unlikely to be mobility-friendly and is positively dangerous at the junction point. Redrow's record of good provision in this area is poor.
- The proposal does nothing to offer benefit to the local community – on the contrary, it will be a significant disbenefit in almost every respect. For example, see the analysis of healthcare in the area (Appendix 4)

From the detailed critique that follows we would contend that the Design and Access Statement, which is intended to provide the main justification for the proposal, falls short in many ways. The bullet points above and the details below provide ample evidence of this, reflecting the inherent unsuitability of the applicant's current proposals for this site.

If the applicant is serious about community engagement and 'listening to learn' (as they state) we would welcome the opportunity to take part (with other stakeholders) in a genuine community engagement exercise in an effort to develop a more appropriate approach to the subject site.

However, given the information we have at this time, we urge the Council to REFUSE the application as it stands.

2. Design and Access Statement

The Design and Access Statement follows a similar pattern to those provided by this developer on other sites in the vicinity – it includes words which promote the supposed accessibility, sustainability and quality of the proposal but omits any real detail. It omits any elements that provide contra-indications to undermine the proposal. It reserves much of the detail for later stages, but we would contend that the ‘devil’ is in this very detail and Redrow have proven by their track record that their delivery often falls short of the vague promises made at this early stage. We have therefore used the lessons of previous Redrow developments in the area to inform and supplement some of our objections to current application.

2.1 Design Objectives

These state that a diverse ‘mix’ of housing will be provided. However, the site layout plan indicates wholly detached villa style properties for the vast majority of the site with some ‘higher density’ blocks (probably indicating terraced housing) to the eastern boundary. This is presumably the promised affordable housing which is located in the part of the site most likely to suffer noise and traffic pollution effects of the M61 - see below. Good design practice on a site of this scale and nature favours a more mixed pattern of built form. This favours the ‘pepper-potting’ of affordable housing throughout the site, with ‘tenure-blind’ design to ensure a ‘them and us’ situation is avoided. The current design proposed leads to exactly the opposite. This approach by Redrow is a repeat of that most recently seen at the Croston’s Farm development to the south of the subject site where the ‘Avon’ and ‘Stour’ ‘affordable’ house types sit in the least favourable part of the site, adjacent to the M61, and with internal space standards that are significantly below those set out in the Nationally Described Space Standards. This form of ‘design apartheid’ should not be acceptable.

It is stated that the site is designed to provide a ‘distinct identity’. We would contend that, from the information so far available, and the developer’s record, the outcome will be the same characterless pastiche of 1930s suburbia provided by Redrow elsewhere. This is amply illustrated by a quick view of the ‘variety’ offered in sites across the country – see Appendix One. The vernacular of the individual locations is being completely ignored in these developments and, going by the track record in this area, it will be on the subject site unless significant changes are made.

Whilst we would not advocate slavishly copying older styles, we would hope that the site design palette could echo the local stone fronted, slate / gabled roofed, cottage-scale properties that form the majority of the properties on Town Lane, with a built form that tends to provide continuous frontages, not the low density villas which Redrow’s developments have provided elsewhere locally. Thoughtful, contemporary site layout and design could provide a townscape that echoes the best elements of the surroundings of the site, rather than imposing an identity that is not common in Whittle Le Woods (or at least was not until Redrow started developing).

2.2 Placemaking Principles

This section of the DAS sets out a set of design principles and the ‘Redrow 8’ urban design principles. Unfortunately, the currently proposed layout and (as far as can be gleaned) the likely townscape and detailing, fail to address the issues raised. As stated above, there is no indication that the actual layout or design will respond to the vernacular of Whittle Le Woods in general, or most of the

buildings on the Town Lane approach to the site. The proposed layout is a generic middle/upper market speculative estate format, with the 'higher density' housing – we assume this is the affordable portion) to one side in the location most likely to suffer road noise and pollution.

The DAS propounds 'innovation and sustainability' of design but there is no indication of how this will be achieved. Going by Redrow's track record, we are not hopeful. On Lucas Green, for example, PV panels to achieve 'sustainability' targets via renewable electricity are exclusively positioned on the rear roofs of all properties, even when this means they are oriented to the north and north east, which is the least productive orientation for generation. They would be much more effective if positioned to the face south or south west. This would not mean altering the site layout, merely putting them on some front roof slopes. Even if some of the roof details mean smaller areas of panels could be accommodated, this would still be more effective than 'hiding' them around the (north facing) back of the property. Clearly a misplaced design priority has won out over environmental imperative.

The DAS also claims the site will be well connected and incorporate new routes for pedestrian and cycle connectivity. As we will demonstrate below, this is not achieved by the current proposals.

The 'Redrow 8' principles of urban design set out are laudable, but it is not clear how the proposal meets any of them (or, indeed, how they affect proposals for any individual site).

On the important aspect of pre-application consultation, the leaflet provided by Redrow gave scant information on the proposals and the responses to the issues raised are often vague and superficial. Even with the current restrictions, it is vital that a more interactive means of consultation and involvement be developed if the first Redrow principle of 'Listen to Learn' is to be achieved.

2.3 The Site and Context

This section ignores some serious issues that compromise the suitability of the site for development at the scale proposed. We believe the peak vehicle flow rates predicted by the applicant, of 88 departures and 31 arrivals during the busiest morning hour, are significant under-estimates for an estate of this size. Most of the properties will have 2 or 3 cars, and many will have a least 3 or 4 'earners or learners'. Experience from other similar local estates suggests much higher level of vehicle usage, especially at peak times. Unfortunately, during the current lockdown, it is impossible to carry out a meaningful survey to confirm this.

The only access point, onto Town Lane, is to a relatively narrow road that is already well used by both local traffic and as a cut through from the A6 to the A674 Blackburn Road. There is a significant pinch-point and blind bend in the road some 60m to the west of the proposed access point. At this blind bend, the single footway swaps from one side of the road to the other and the carriageway width is only 4.5m. This is in a 40mph stretch of road. Although the applicant's Transport Assessment mentions this carriageway width issue, it fails to point out that this is at the very point where the road bends sharply and there is a blind brow, together with a cluster of 3 driveways in a very short distance - see photos. Given the properties on either side of the road at this point it is very difficult to see how this dangerous situation could be improved.



Above - The 4.5m wide carriageway and narrow footpath at the blind bend with driveways, Town Lane – viewed from East (on left) and West (on right).

The safe use of the proposed site access for traffic may be compromised by vehicles going into or out of Lucas Lane. Here, because of the steep gradient and constrained entrance, traffic tends to swing out across the centre-line of Town Lane. The approach from the east includes the crest of a hill and traffic approaches at speed along this stretch. Although none of the Applicant’s documents seem to have stated it, the whole length of Town Lane has a 7.5 tonne weight limit (which will clearly have to be ignored by the significant amount of construction traffic which will have to use it if the scheme proceeds). To the east of the site Town Lane crosses the Leeds & Liverpool Canal over a single lane, grade 2 listed bridge with no footways and vulnerable parapets. To the west, the length of Town Lane opposite Low Mill industrial Estate is almost always constrained to a single lane by parked cars owned by the residents of terraced housing, where there is no alternative but to park on the road.



Traffic congestion at West end of Town Lane – several parked cars are continually present here. NOTE – this is a ‘typical’ situation – it is frequently more congested than this.

In addition, Town Lane is a well-used horse-riding route. There are 4 sets of stables along its length between Lady Crosse Drive and the canal, and it is part of a well-known local ‘circuit’ for riders, being designated a ‘semi-rural lane’ by Lancashire County Council. The extra traffic will conflict with this activity and could cause danger to horses, riders, and other road users.

Given the local road layout, we would anticipate some of the extra residential traffic will use Lucas Lane to access Chorley and Buckshaw Village, and Town Lane and the very narrow Dark Lane to access the M61 southbound. Lucas Lane and Dark Lane are both very narrow roads and unsuitable for journeys other than for direct access to properties on them. The extra volumes of traffic generated by an estate which provides 675 car parking spaces will significantly exacerbate the existing issues arising from these constraints. The Lucas Lane issue will be further exacerbated by the applicant's proposal to build on Croston's Farm.

The distances quoted to support the contention that the site is highly accessible for non-motor journeys (by foot or by cycle) seem to be 'as the crow flies' or they are significant underestimates. They also take no account of the varied local topography – for example, use of some of the footpath routes quoted require climbing the hill on Chorley Old Road and then descending to the A6 – both steep gradients.

The nearest bus route is at Waterhouse Green, but this provides only a very limited service of hourly in each direction at peak times. There is no evening service, and the Sunday service has been discontinued. The distance claimed of 400m to this bus stop is significantly under-estimated (the distance to the site entrance being c600m), especially for the occupants of the higher density (probably affordable) portion of the site. **This is not a 'high level of accessibility' as claimed in the DAS.**

Much is made of Whittle Le Woods as a centre for services. Yet the plan (Framework Travel Plan, Fig 3.3) provided is out of date, including a shop (the nearest to the site) that has closed and ignoring the extra distance to the co-op small general store (c1600m from the site). The doctor's surgery is also relocating an extra c800m further north, away from the site, and the dentist indicated elsewhere does not take NHS patients.

The DAS and other supporting documents indicate that journeys to these 'local' facilities are envisaged to be via foot or cycle, rather than vehicle. This is incredibly optimistic as the footpath leading to the north from the site (giving the most direct route, probably closest to the distances quoted in the application) is invariably difficult to navigate because of mud – even in periods of good weather this persists along the considerable stretch at the base of the embankment to the former canal near Martin Farm. This route is a rough walking route with stiles, not one that would be classed as suitable for a trip to the shops. It would certainly be impassable for large parts of the year of a person with a buggy or less than good mobility, for example. The path then proceeds via a private road and Hilltop Lane, neither of which have footways (including at access points to 2 quarries used by heavy traffic).

The cycleway indicated on the 'indicative masterplan' to the north does not yet exist, and the route shown goes directly up the valley side, rising by 35m in less than 200m. This cycleway link is unlikely to be built in the near future and in its absence, cyclists would need to go round Town Lane and then tackle Dolphin Brow to access the 'local' store. Dolphin Brow on Chorley Old Road is itself a steep hill with a blind and narrow bend at the top, and would not be suitable for many casual or young cyclists.



ABOVE: The footpath leading from the site to the north. This is not a good route to the local shop.



Above - Town Lane bend – single narrow footway



Chorley Old Rd bend on steep hill – single narrow footway

In short, the most direct route to the single local shop for pedestrians is not generally suitable for shopping trips, and the cycle route is not easy. It is therefore likely that most trips from the site to access these local amenities will be via car, rather than more sustainable transport. This will, in turn, have a significant effect on traffic levels. **To confirm this, the Committee are invited to undertake a site visit which includes walking or cycling to the local amenities.**

The same argument as above relates to the playground in the centre of Whittle Le Woods. The DAS claims this has a 'high' level of accessibility which is plainly incorrect for children of an age that would use the facilities provided. Additionally, one of the play areas proposed on site is immediately adjacent to a drainage pond, which could be very dangerous.

The routes using footpaths 9-22FP58 and 92-22 BW57 which the DAS claim would be used to access the GP surgery and School are plainly not practical – they would involve ascending Dolphin Brow / Chorley Old Road only then to steeply descend to the A6. The much more likely route would be to

follow Town Lane, cross Waterhouse Green and walk up School Brow, which itself has problematic footways and parking issues. The proposed cycleway is covered in more detail in Section 2.7 below.

We have researched the local school provision and it has been confirmed to us that both the St John's CofE primary and St Chad's RC primary which are closest to the site are already oversubscribed (typically 100+ applications each year for 30-35 places). The promise of CIL to support infrastructure is wholly inadequate for the shortcomings that exist locally for a proposal of this size, especially combined with the applicant's other local development underway at Croston's Farm.

It is our strong contention that the DAS seriously overstates the accessibility and therefore sustainability of the site. This in turn will have a knock-on effect on the number of car journeys made from and to the site, increasing traffic along Town Lane and more widely. In particular, the site would mean that for anyone with conditions affecting mobility (including limited range for walking, heart / lung conditions and visual impairment) the site would only be accessible with assistance and probably motor transport. From a transport and accessibility point of view, this site is very poor indeed.

2.4 Constraints and Opportunities.

The applicant's contention that the site is of little ecological value is strongly contested. Several of the applicant's documents refer to the site as being 'opencasted' in the past. This implies it is has been damaged and is not in its natural state. In fact the surface damage from the temporary gravel extraction in the 1970s has been almost entirely remediated by the passage of time. The site has the appearance of being 'greenfield'. The site supports (either as habitat, food source or throughfare) a wide variety of birds and animals, detailed in Appendix Two. ELEVEN of the bird species listed are on the BoCC's Red List. Several of these are ground-nesting species. Bats using the site will also be disturbed and will lose habitat of mature hedges and trees due for removal.

This Appendix demonstrates the vagueness of the words used in the DAS and the impact the proposal will have on the fauna on the site. We do not believe the applicant's Ecological Impact report has covered the site in sufficient detail. The wildlife currently using the site will not continue to be supported by the much smaller areas of open land proposed by the developer, whose track record on provision for wildlife is poor, given the evidence from Lucas Green.



The species listed in the appendix have all been observed on the site. In particular, its use by deer, thought to traverse north-south between other open spaces would be blocked by the proposal. The disturbance of bats and ground-nesting birds would be immense.

Left: Deer on site, January 2021. Photo: Rabia Govali

The effects of run-off containing silt from the construction and then longer term may affect the fishing lodge which depends for its supply of water on springs from the site which are fed by underground aquifers that may well be disturbed by site works. Residents on Town Lane have already noticed increased silt levels in the stream that flows from the same applicant's current works at Croston's Farm.



Springs from the site feeding the Fishing Lodge – this is vulnerable to pollution and changes in flow.

Both the Desk Study Report and Flood Risk Assessment (FRA) Documents confirm that the majority of the site area (described in the Desk Study Report as the Eastern Area – comprising four fields to the east of Lowe Barn) is currently poorly drained – due to historical gravel mining activity in the 1960's for the M61 motorway. Other objectors have, we understand, commissioned a technical review of the FRA and so our comments are made from a lay (but locally informed) standpoint. The fields in the north and east of the site regularly hold surface water (as anyone familiar with walking the public right of way through them would testify) and are very boggy with reeds being the dominant vegetation .



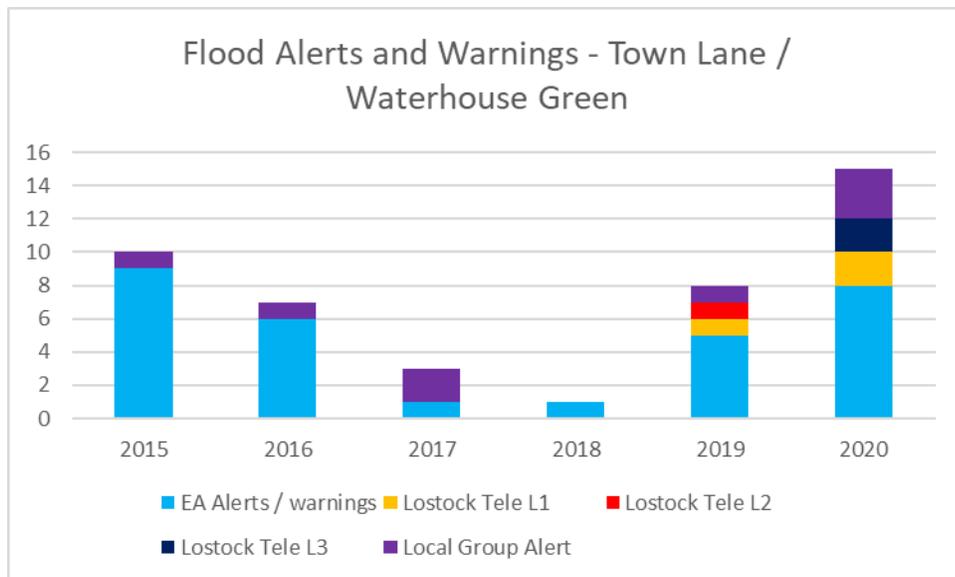
One of several areas on the site which currently 'store' water for gradual release into the river. The current benefit realised by the topography is that the land already retains considerable rainfall – probably more than the proposed retention pond for that area, the northern end.

The River Lostock located to the site’s north western boundary is currently protected from the impact of swift rainfall run off from these fields because of the time taken for percolation to the watercourse or absorption. The conversion of these fields into a major housing estate will mean that the protection currently afforded to the River Lostock will be lost – with the resulting impact downstream in the Waterhouse Green area of the village in times of heavy rainfall. The positioning of the proposed attenuation pond in the ecological area close to the course of the river will not afford the same delay in run-off reaching the river and increasing flow at critical times.

The remainder of the site (described as the Western and Central areas in the Desk Study report) appears to be intended to drain (according to the FRA) into a proposed Detention Pond at the Western corner of the site and from there released into a Public Surface Water drain at Lady Crosse Drive (which in turn feeds into a stream flowing into the Lostock at Waterhouse Green). We repeat our concerns noted above. We believe the WaterCo report should be much more detailed.

We also note that a Detention Pond was created on the recent completed Redrow Lucas Green Estate – which appears to do little to limit excess water run-off from this estate. We have similar concerns over the Detention Pond planned for the currently in progress Croston’s Farm Development.

It should be noted that flood warnings are a regular occurrence in this part of the village - there have been at least nine in the last 12 months (see graph below and Appendix Three). It should be noted that at each EA flood Alert or warning, residents have to take action as if flooding will occur, which causes distress and disruption. The River Lostock Telemetry was only installed in mid 2017.



Recent research by the Water Resilient Cities project indicates that the North of England is likely to see severe flood events increase by 25-28% in magnitude. We understand this to have effects in both frequency and seriousness of events. We believe the flood risk data relied on by the developer is now being superseded by the increasing frequency of storm events. The Developer states that there will be no increased run-off over the life of the development, but this is irrelevant. It is the

exceptional event run-off that causes local flooding, and the site currently absorbs a vast amount of water which is released slowly into the River Lostock.

We are very concerned that the ability of the proposed attenuation measures will not be enough to prevent a worsening of the already bad situation for local residents. We are very concerned that insufficient pre-application monitoring has been carried out to firmly conclude that the proposals will not increase the vulnerability of Waterhouse Green / Town Lane, to flooding and we believe the applicant's survey and report do not cover the issues that need to be addressed.

We note the intention to drain foul water into the public combined sewer on Town Lane. We believe this to be 375mm diameter. We note that the FRA document predates the plans finally confirmed for the neighbouring Croston's Farm site (which entail the installation of new sewer infrastructure along Town Lane from its junction with Lucas Lane) and in this respect the Drainage network Plans provided by UU to support the FRA are out of date. We have written to UU in part requesting confirmation that the combined effect of the Croston's Farm and Town Lane Foul water drainage plans will not compromise the existing Public Combined sewer on Town Lane and await their reply.

We have concerns that the impact of the noise levels from the M61 have been downplayed and that they will have a significant impact on the site. The proposed 3m noise barrier seems to be positioned in a location that is below the level of the road and so its effectiveness will be compromised. The issue of air pollution caused by the high amount of heavy traffic using the motorway as it climbs the hill is also a concern. We believe the site suffers from relatively high levels of both PM2.5 and NO2 pollution. This is further detailed in Appendix Four. We are not aware that the applicant has carried out a detailed air quality assessment – this should be done – in conditions of full traffic, not Covid19 lockdown – before any planning consent is considered.

In terms of delivery of the development, we have significant concerns around the amount of heavy traffic this will generate. As previously stated, Town Lane has a 7.5 tonne weight limit, is a designated semi-rural lane and has a significant amount of pedestrian, cycle and horse usage. The eastern end has a narrow section outside a primary school with a footway on one side of the road only. From this direction the road also passes over the single lane hump backed Grade 2 listed canal bridge (with parapets and no footways), with single-side footways for significant parts of the route. It is unlikely that heavy traffic will be able to access the site from this direction. To the west, Town Lane has the restriction and bend outside 'Brantwood', again with poor footway provision and then towards the end the hazard of almost permanently parked cars towards the entrance to Low Mill. The footway here is single sided. This area will be a source of significant issue both during the construction period and after when the site is occupied, if the full 250 homes are built.

2.5 Planning Policy Context

We understand this application is one of seven applications by various developers made to Chorley BC within a short period of time. We are confining our comments to this site, but we are very concerned at this concerted effort to rapidly expand the town when facilities and services are not in a position to keep up. This is supported by the high number of properties developed within Whittle le Woods over the past 20 years with very little in the way of new infrastructure, other than the geographically distinct Buckshaw Village. The health indicators for the whole area are also

concerning, revealing relatively high demand and relatively low provision (see Appendix Four). Significant amounts of new development can only make this more problematic.

The higher density housing (where it is likely the affordable homes will be located) is positioned in the least favourable part of the site – furthest away from the amenity areas, closest to the noise and air pollution from the M61 and at the most distant point for pedestrian and cycle access to services.

The document is very vague on environmental standards for the new development. Given the national policy objective of achieving zero carbon by 2050 it would be appropriate to make a commitment to delivering very low carbon properties, building in renewable energy heating rather than committing the properties to gas boilers, orienting the properties and designing fenestration to maximise solar gain and using some of the open space for sustainable local production (e.g. allotments, a community orchard). We would also expect each home (including the affordable ones) to be provided with at least one electric vehicle charging point. Whilst the application is not yet at a detailed level, it is not unreasonable to expect these matters to be dealt with at the inception and masterplanning stage – they are notably absent.

This section of the DAS also claims that the proposals respect local character. As stated above, local character is exemplified by stone fronting, slate roofs, gable ends (not hips) and linked buildings. Indications from Redrow is they propose brick built detached villas, with tiled and hipped roofs.

2.6 Access

We believe we have demonstrated above that the site will not provide easy accessibility to local services other than by car, and therefore does not meet the requirements of local policies. We believe the calculations for vehicular journeys vastly understate that which is likely and would be confident of demonstrating this by surveys of other local development sites. However, the present Covid lockdowns make such an exercise currently impossible.

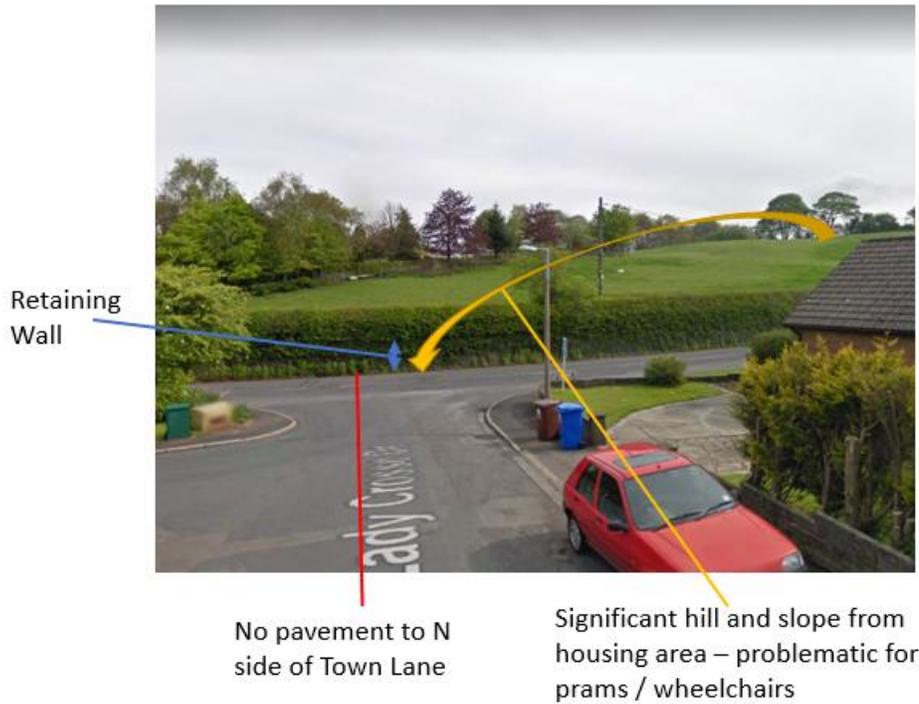
2.7 Meeting Design and Access Objectives

Much of this section vaguely repeats points claimed to have been demonstrated earlier in the document. Repetition does not indicate veracity. In many respects the DAS fails to demonstrate that its own objectives have been met, or that the level of quality it says it aspires to will be delivered on this site.

The site's location, character and linkages mean several of the stated objectives are difficult to meet (e.g. non-vehicular access).

The path and cycleway proposed to run to Town Lane at the western end of the site has been located with scant regard for the topography of that area and safety of users. As can be seen 'on the ground' and from the topographical survey, the land here rises up from the proposed housing to the east and then falls sharply to meet Town Lane, with a significant retaining wall making the boundary. The proposed junction with Town Lane is directly opposite Lady Crosse Drive . This is illustrated below.

Issues with access to proposed cycleway / footpath at west end of site



The proposed line of the path / cycleway means it will include a considerable slope up from Town Lane which will be much steeper than the recommended 1:20 for wheelchair use. To achieve this gradient would require significant groundworks giving a 'railway cutting' effect or include zig-zags to lengthen the path to decrease the gradient. The point of access to Town Lane is also on the inside of a significant bend without a footway and so is a hazard for joining the trafficked route, especially as it conflicts with the Lady Cross Drive junction.



Proposed cycleway / footpath exit onto Town Lane – on inside of bend with limited visibility, no footway on N side of road, clashes with junction of Ladycrosse Drive.

Redrow's track record of providing for non-vehicular journeys is very poor, with the example locally of the path and cycle track between their Lucas Green development and Lady Cross Drive

being so poorly designed and constructed that, only a couple of years after construction it has deteriorated significantly.



Above – Cycle path/footway only recently provided by Redrow at Lucas Green. The erosion of surface is caused by surface water run-off from inadequate rainwater mitigation measures.

Our contention is that the subject site has such significant constraints that sustainable development, responding to the nature and context of the site is very difficult. At the scale proposed it is impossible. If the site is to be developed it should be for many fewer properties, designed sympathetically to compliment the local character, leaving the northern and eastern parts of the site as open land. Much more attention needs to be paid to environmental sustainability, responding to the site’s ecology and ensuring safe access and use of Town Lane.

3. Conclusion.

From this detailed critique we would contend that the Design and Access Statement, which is intended to provide the main justification for the proposal, falls short in many ways. The bullet points at the start of this analysis and the detail above provide ample evidence of this, reflecting the inherent unsuitability of the applicant’s current proposals for this site.

If the applicant is serious about community engagement and ‘listening to learn’ we would welcome the opportunity to take part (with other stakeholders) in a genuine community engagement exercise in an effort to develop a more appropriate approach to the subject site.

However, given the information we have at this time, we urge the Council to REFUSE the application as it stands.

APPENDIX ONE – Redrow Design Variety - examples of ‘variation’ to reflect local character



Caddington Woods, Bedfordshire



Thorpe Park Leeds



Cae St Fagans, Cardiff



Northampton



Leyland, Lancashire.



Sherburn in Elmet, N Yorks



Leyland, Lancashire



Haywards Heath, West Sussex



Blackford Cross, Chester



Canterbury, Kent

In short, Redrow seem to provide the same pastiche of 1930s design response no matter what the local vernacular.

Appendix Two – Ecology and Schedule of wildlife known to use the Town Lane site and environs.

Part One - Ecology

The Design and Access statement is littered with glib statements highlighting how the development will provide opportunities to enhance the ecology of the area. Examples include:

- *'Nature for people: Creating new or enhancing existing wildlife habitats and better connecting people to them.'*
- *'Opportunities to enhance biodiversity'*
- *'New development will not have an adverse effect on statutory or non-statutory designated sites for nature conservation'*
- *'This area will accommodate new open water by way of a surface water detention pond. The pond and its margins present a particular opportunity to create new and better habitats'*
- *'New greenspace corridors are included in the framework for development.'*

We comment on the above statements below.

The Cambridge Dictionary defines ecology as:

the relationships between the air, land, water, animals, plants, etc., usually of a particular area, or the scientific study of this:

In simple terms circa 13 hectares of safeguarded land is being removed thus increasing pollution and removing the habitats of wildlife and vegetation. This does not, under any circumstances enhance wildlife habitats and biodiversity.

The National Geographic Society refers to a habitat as:

*'... a place where an organism makes its home. A **habitat** meets all the environmental conditions an organism needs to survive. For an animal, that **means** everything it needs to find and gather food, select a mate, and successfully reproduce. ... The main components of a **habitat** are shelter, water, food, and space.'*

This proposal severely depletes space and food and in addition removes shelter. Thus it destroys a large area of habitat that it purports to support and enhance.

Further the main source of water for this habitat and more downstream including the fishing lodge and Cuerdon Valley are springs on site and the River Lostock, which will be at risk of contamination.

A report commissioned from Water Resource Associates dated January 2021 advises that the FRA report does not include any information about the risk of contamination to the River Lostock and the fishing lodge on the north-western edge of the site.

In regard to surface water detention ponds, they do not create "*better habitats*". Evidence of this can be found on the Redrow Lucas Lane site where, not only does the pond not function correctly, but it is not maintained (in breach of any maintenance schedule) and has created nothing in terms of a habitat.

Further, we would expect to see on a development of this scale:

- The facility for plant and animal life to be able to **pass through** the development
- Corridors of grassland/hedgerows **throughout** the development

These two points are simply not addressed by the plans submitted, despite the assertion that “*New greenspace corridors are included in the framework for development.*”

We attach a list of wildlife observed over the last 24 months by a local resident whose property overlooks the site.

The list is up to date and relevant, more so than the inadequate observations made by the Redrow Ecology Consultants ERAP Ltd.

Importantly the ERAP report was undertaken following a single day visit, outside the breeding season for birds and hence it is no surprise they found no evidence of ground nesting birds.

The limited survey also failed to detect otters.

We know these are present in the river and the commercially stocked fishing lodge adjacent to the site has been obliged to erect fencing to prevent otters gaining access to the lodge.

The ERAP report recommends that any loss of hedgerow must be compensated for by the provision of an equal or greater length of native species-rich hedgerow which must be managed in the long term for its benefits to biodiversity. Replacing mature hedgerow is known to be devastating for wildlife as the new provision lacks the complex matrix of biodiversity that is lost. The enclosed photograph of a now 4-year-old hawthorn hedge planted and ‘managed’ by Redrow on the Lucas Lane site, evidences the flagrant disregard of the above commitments. (This despite countless emails over 3 years asking for the issue to be addressed. It is patently obvious that this ‘hedge’ supports nothing like the diversity of wildlife that would suffer from the removal of a mature hedgerow.



The Design and Access statement includes “The limited extent of hedgerows on the site are Priority Habitat, and along the north-eastern edge the broad-leaved woodland is an example of lowland Mixed Deciduous Woodland Priority Habitat. Hedgerows and woodland **should** be retained and managed to enhance their biodiversity value.” The word “should” leaves Redrow with too much scope and our preference is that this, in the event of planning permission being granted, is replaced by **will**. Doubts however exist, considering the above example, that the hedgerows would be **managed**.

The list of sightings provided by the local resident detailed below includes 11 species of birdlife noted on the Birds of Conservation Concern 4 (BoCC) Red List and 8 species on the BoCC4 Amber List. Several species are also ground nesting e.g., Curlew, Lapwing, Snipe and Oystercatcher. Their breeding site will be destroyed.

The ERAP report also makes recommendations for bat, house sparrow and other woodland bird boxes to compensate for the loss of habitat. These are poor compensation for the extensive loss of habitat which will occur. To quote the Wildlife Trust:

Nature doesn't & can't live in a box

Finally, Lucas Lane Pastures, a Biological Heritage Site, is close to the site. The ERAP report considers "*The proposals are reasonably unlikely to impact upon the BHS either directly or indirectly.*" Hence, they do not rule out that there will be an impact. Two potential impacts may be pollution from the site and increased vehicular traffic on Lucas Lane. Redrow is currently building 53 houses on land opposite the BHS. Already residents have noted the complete absence of deer grazing on the site since construction work began. This had previously been an almost daily occurrence, much appreciated by residents of Whittle and visitors walking along Lucas Lane. It has also been noted that the silt levels in the stream along Town Lane have increased since the works began. This does not sit very well with the Design & Assess statement in the first bullet point from the Design and Access Statement quoted above:

- *Nature for people: Creating new or enhancing existing wildlife habitats and better connecting people to them.*

Appendix Two, Part Two

Schedule of Wildlife - All of these have been seen on the site over the past 2 years. Frequency varies.

1. Birds (mix of resident and visiting)

BoCC 4 Red List status	BoCC 4 Amber List status	BoCC 4 Green List status
House Sparrow	Snipe	Blackbird
Tree Sparrow	Swift	Long Tailed Tit
Starling	House Martin	Great Tit
Merlin	Oystercatcher	Blue Tit
Song Thrush	Tawny Owl	Nuthatch
Mistle Thrush	Cormorant	Blackcap
Yellow Wagtail	Kestrel	Goldcrest
Fieldfare	Mallard	Swallow
Grey Wagtail		Greenfinch
Lapwing		Wren
Curlew		Barn Owl
		Little Owl
		Sparrowhawk
		Buzzard
		Pheasant
		Canada Goose
		Grey heron
		Moorhen
		Partridge
		Peregrine Falcon
		Goldcrest
		Robin
		Chaffinch

2. Mammals, Amphibians

Moles, shrews, field mice, rats

Foxes, stoats

Roe deer, fallow deer*

Hares, rabbits, hedgehogs

Bats** (probably brown long-eared and pipistrelle)

Frogs, toads, common newts

NOTES

*It is believed that the site forms part of a north-south corridor on the western side of the M61 for deer to traverse the area and may be a linkage between more substantial populations to the north and south.

**Some of these bats are believed to roost in one or more of the oldest sycamore trees to the west of the site, some of which are identified for felling in the application.

Appendix Three - Flood Alerts and Warnings 2015 – Jan 2021

Flood events body of Evidence	Previous							
	Major Floods	2015	2016	2017	2018	2019	2020	2021
EA Flood Alerts / Warnings Totals	2	9	6	1	1	5	8	2
	22/08/1987	31/03/2015	03/01/2016	21/10/2017	12-Oct	12/03/2019	09/02/2020	14/01/2021
Upon receipt of a Flood Alert, Residents have to take action as if flooding will occur, which causes distress and disruption.	01/08/1999	02/06/2015	09/01/2016			28/07/2019	15/02/2020	18/01/2021
		07/10/2015	29/02/2016			27/09/2019	16/02/2020	
		22/10/2015	08/03/2016			05/10/2019	24/02/2020	
		14/11/2015	22/08/2016			13/12/2019	25/08/2020	
		05/12/2015	11/11/2016				03/10/2020	
		12/12/2015					06/10/2020	
		21/12/2015					07/10/2020	
		25/12/2015						
River Lostock Telemetry system (2018)				0	0	2	4	
		Boxing Day				L1 *	L3	
Residents know flood threat is imminent		Floods				02/08/2019	09/02/2020	
L1 - River has risen significantly, 2 is a concerning level, L3 is Critical level (flooding is assured)		Town Lane & Waterhouse				L2 *	L1	
		Green				29/09/2019	25/08/2020	
Note not all EA FW match							L3	
Local & telemetry events *							06/10/2020	
							L1 *	
							29/10/2020	
Local watercourse flooding								
Town Lane / Lucas Lane areas	2	1	1	2	0	1	3	1
Flooding not always related to EA Alerts, could be after heavy rainfall, water rises quickly	05/07/2012	26/12/2015	26/01/2016	05/10/2017		29/07/2019	13/02/2020	19/01/2020
	18/12/2013			07/11/2017			27/09/2020	
							06/10/2020	
Other Issues Logged - all evidenced					May & Sept 2019	24/04/2019		
					Water discolour	Sewer Burst		
					Moss Lane build	End of Town Lane		
Comments:								
Whittle-le-Woods Parish Council installed a Local telemetry system in River Lostock at Waterhouse Green back in Aug 2017. It is set at 3 levels L1, L2 & L3								
Residents and the Flood Action Group now know what to expect once the L1 warning is issued. By way of example February 2020 the river level rose from L1 to L3 in 4 hours, causing more flooding to houses and gardens.								

Appendix Four - Air quality issues in respect of planning application 20/01347/OUTMAJ

- Allowing this development before adequate consideration through the local plan process would appear to run contrary to the councils own stated objective of - “producing an ambitious plan that will then support individual authorities to implement planning guidance that seeks to minimise any negative impact of development on air quality and strive to improve air quality”.
- The design and access statement pays lip service in encouraging a reduced reliance on car usage without adequately outlining how this will be done, but at the same time includes provision for an additional 675 cars.
- Levels of pollution already seem to be high around the two nearest monitoring tubes to the proposed site - 18 and 18b show some of the highest levels of pollution in the area.
- We conclude that the so called “affordable housing” will be occupied by residents in a lower socioeconomic group, young families, or first-time buyers. One might surmise this group may have poorer levels of health and comprise a higher proportion of children. They are therefore more susceptible to the effects of pollution and it seems inappropriate to site such housing close to the M61 motorway.
- We note there are several actions listed in the Annual Air Quality Status report under section 2.3 The Local Authorities Approach to Reducing PM2.5 Emissions and/or Concentrations As detailed in Policy Guidance LAQM.PG16 (Chapter 7) – Pages 6 and 7. We are interested to understand how the Council seeks to apply these objectives to this and any other planning applications going forward.
- Section 2.3 also states that “Public Health have produced data (June 2017) which identifies the mortality burden of PM2.5 on the under 75’s. The Lancashire average is 15.3/100,000 population, Chorley is 17.1/100,000 population, the second highest in Lancashire after Burnley (Blackpool and Blackburn with Darwen are not included as Unitary Authorities)”. Again, the proximity of some housing close to the M61 and the number of additional cars being catered for would in our view be likely to make this position worse. At the very least this should be considered and monitored properly prior to allowing any development to ensure the councils own objectives on air quality are met.

We would conclude that in the absence of a new local plan this development should be refused. In the meantime, there should be more air quality monitoring of local sites proposed for development prior to their inclusion in the local plan or mitigation measures put in place.

Where development is allowed the developers should as a condition of planning be expected to put in place robust strategies to offset any additional pressure on air quality. Such measures might include support for better public transport, the embedding of green energy solutions such as heat pumps into housing design, or the inclusion of electric car charging points as standard.

Appendix Five - The state of Healthcare in Whittle, Chorley and the wider Lancashire area.

- Across the Chorley and South Ribble area the ratio of GP's and other patient facing staff is below the average for England as a whole (HR1)
- Lancashire Teaching Hospital Trust, which is currently the main acute trust for the area, has in its last annual report to 2020 only met 3 out of 14 of its performance indicators. Its latest CQC inspection indicated that the trust "requires improvement" in three of the five areas inspected. The CQC's assessment of the trust was that "it requires overall improvement" (HR2 and HR3)
- The Marmot Data for Lancashire indicates that Overall Life Expectancy and Healthy Years Life Expectancy is below the England average across all indicators for both Male and Females. (HR4)
- Chorley has a higher-than-average number of people with long term and complex health conditions compared to the England average. (HR7)
- Children's Oral health in Chorley is well below the England average and currently none of the local dentists are taking on new NHS patients. (HR8) (NHS Choices data)
- Hospital admissions due to asthma in children and in young adults under 19 years is above the average for England as a whole (HR5 and HR6). This has implications when considering additional air pollution in developments close to major highways such as the A6 and M61 motorway.
- Hospital admissions generally are above the England average in Chorley. There is also a higher incidence of admissions due to respiratory conditions particularly in children (see above re air pollution) (HR6)

Reference documents (HR*n*) can be provided for the above if required.

Conclusions.

Generally, we can conclude that the health of residents of Chorley and Lancashire is below the average for England. This results in lower life expectancy and a higher than average need to access healthcare services. Additionally, the evidence is that local healthcare infrastructure is at best stretched and at worst is already broken. The recent report 'NHS Performance and Waiting times Priorities for the next Government' (2019), indicates that patient satisfaction and performance are deteriorating across the whole of the country in both primary and secondary care. Given that Lancashire and indeed Chorley are performing below the England average it would seem logical that healthcare provision that does not keep pace with additional residential development, risks the health and indeed the lives of existing residents? We note that the population of Chorley has increased by 23.2% since 2016 well above the England average of 17.3%. Some of the observations above have wider implications for Lancashire but we would conclude that without substantial investment in infrastructure and in particular healthcare there should be no further development in Whittle Le Woods or indeed Chorley until a full review of the local plan and infrastructure improvements is concluded.