

**Proposed development:** Outline planning application with all matters reserved for residential development (up to 30 Dwellings); demolition of existing buildings and associated works including bat mitigation measures.

**Site address:**  
Land at Tower Road  
Blackburn  
BB2 5LE

**Applicant:** Capita

**Ward:** Livesey with Pleasington  
**Ward:** Meadowhead

**Councillor Derek Hardman**  
**Councillor John Pearson**  
**Councillor Paul Marrow**  
**Councillor Julie Gunn**  
**Councillor Konrad Tapp**  
**Councillor Keith Murray**



## **1.0 SUMMARY OF RECOMMENDATION**

- 1.1 APPROVE – Subject to a Section 106 Agreement relating to contribution towards affordable housing provision and investment in improved off site Green Infrastructure provision and conditions set out in paragraph 4.1 of this report.**

## **2.0 KEY ISSUES / SUMMARY OF PLANNING BALANCE**

- 2.1** The proposal is in outline form. For that reason it is only the principle of the residential development and demolition of the buildings on site that is under consideration. All other detail is to be assessed under a subsequent application for reserved matters. It is envisaged that the development would consist of up to 30no. dwellings.
- 2.2** The proposal corresponds with the Council's overarching housing growth strategy, as set out in the Core Strategy and Local Plan Part 2. It suitably demonstrates the ability to deliver a high quality development, consistent with the surrounding area and to provide a solution to the section of the site blighted by the redundant Home for Older Persons. It would also make an important contribution towards the Council's housing delivery targets because a 5-year supply cannot currently be demonstrated, and it will add to the vitality of the local housing market. Moreover, from a technical point of view, all issues have been addressed through the application or are capable of being controlled or mitigated through planning conditions.
- 2.3** Approval of the application will allow positive progress to be made towards demolition of the redundant building, which is a significant blight on the area and uninhabitable. Development on the footprint of the existing building alone would not provide a viable scheme, and therefore re-development would not take place. The negative impact on the area would grow over time as the building deteriorates. It is therefore necessary to enhance the site through a high quality development on the whole of the proposed application site. Whilst an area of open space will be lost, this concern is robustly mitigated by two actions: the retention of a significant and enhanced area of open space; and the provision of a commuted sum of £1000 per dwelling which will contribute towards open space and pathway improvements in the area of Witton Park immediately adjacent to the site.

## **3.0 RATIONALE**

### **3.1 Site and Surroundings**

- 3.1.1** The application site is owned by Blackburn with Darwen Borough Council. The intention is for the Council to dispose of the land to a developer under an informal tender process, which ensures the Council's key objectives and planning and design requirements are achieved, whilst also providing scope for higher quality and innovative solutions from the developer.

- 3.1.2 The site is roughly rectangular in shape, with an area of 1.29 hectares; comprising 0.35 hectares of brownfield land and 0.94 hectares of open green space. It lies within the outer extremities of Blackburn's urban boundary, circa 100m west of Preston Old Road, at the junction of Tower Road (to the north) and Hillcrest Road (to the east). To the immediate south is housing and beyond is Geddes Street which adjoins Hillcrest Road. To the west is Witton Country Park which accommodates Pleasington Playing fields; an area which forms part of a Biological Heritage Site, within a much wider Green Belt allocation. No part of the application site lies within the Green Belt.
- 3.1.3 The site accommodates the redundant Home for Older Persons in the southerly corner. The building and its associated parking and servicing area accounts for the aforementioned brownfield allocation. The remainder of the site is open space, of which half is allocated as Green Infrastructure (GI) in the Local Plan Part 2 Site Allocations and Development Management Policies. This is primarily identified as the green space to the north of the redundant building, extending west to the access gates to Pleasington Playing Fields and returning in a south easterly direction back to the building. The open space to the west of the building extending up to the urban boundary is unallocated. The site features a number of trees, both within the confines of the redundant building and along the length of Tower Road.
- 3.1.4 The surrounding area to the north, east and south is characterised as residential. Tower Road, along its length opposite the application site, hosts a range of detached a semi-detached family house types. Hillcrest Road opposite the application site hosts a mix of semi-detached and terraced house types.
- 3.1.5 The suburban location is generally regarded as very desirable, benefitting from its edge of Green Belt setting. It is a sustainable location for housing, with convenient access to a bus service along Preston Old Road, Cherry Tree Train Station and local convenience shops and is well served by primary and secondary schools.

## **3.2 Proposed Development**

- 3.2.1 Outline planning permission is sought for a residential development of up to 30 houses with all matters reserved, demolition of existing buildings and associated works including bat mitigation measures; as set out in the submitted drawings and supporting Planning Statement.
- 3.2.2 As an outline proposal, it is only the principle of the residential development of the site that is under consideration.

## **3.3 Development Plan**

- 3.3.1 The Development Plan comprises the Core Strategy and adopted Local Plan Part 2 – Site Allocations and Development Management Policies. In determining the current proposal the following are considered to be the most relevant policies:

### 3.3.2 Core Strategy

- CS1 – A Targeted Growth Strategy
- CS5 - Locations for New Housing
- CS6 – Housing Targets
- CS7 – Types of Housing
- CS8 – Affordable Housing Requirement
- CS15 – Ecological Assets
- CS16 – Form and Design of New Development
- CS18 – The Borough’s Landscapes
- CS19 – Green Infrastructure

### 3.3.3 Local Plan Part 2

- Policy 1 – The Urban Boundary
- Policy 3 – The Green Belt
- Policy 7 – Sustainable and Viable Development
- Policy 8 – Development and People
- Policy 9 – Development and the Environment
- Policy 10 – Accessibility and Transport
- Policy 11 – Design
- Policy 12 – Developer Contributions
- Policy 18 – Housing Mix
- Policy 38 – Green Infrastructure on the Adopted Policies Map
- Policy 40 – Integrating Green Infrastructure and Ecological Networks with New Development
- Policy 41 – Landscape

## **3.4 Other Material Planning Considerations**

### 3.4.1 Green Infrastructure Supplementary Planning Document.

### 3.4.2 Residential Design Guide Supplementary Planning Document

### 3.4.3 National Planning Policy Framework (The Framework)

Of relevance is section 6 (paragraph 47) of The Framework, which sets out that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements. Section 8 relating to the promotion of healthy communities and section 11 (paragraph 118) relating to the enhancement of the natural environment, which requires local planning authorities to conserve and enhance biodiversity, are also of relevance.

### 3.4.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications be determined in accordance with the development plan unless material considerations indicate otherwise.

### 3.5 Assessment

3.5.1 In assessing this outline application there are a number of important material considerations that need to be taken into account, as follows:

- Principle of residential development and demolition;
- Ecology;
- Highways;
- Amenity;
- Design;
- Drainage
- Trees;
- Affordable housing.

#### 3.5.2 Principle

The principle of the development is considered under the Blackburn with Darwen Local Plan Part 2: Site Allocations and Development Management Policies; particularly Policy 9 – Development and the Environment, Core Strategy Policies CS1, CS5, CS6, CS8 and CS19 and the Council's Brownfield Register.

3.5.3 The site lies within the defined urban boundary, in accordance with Core Strategy Policy CS1, and Local Plan Part 2 Policy 1, which set out the principle that the preferred location for new development will be within the urban area.

3.5.4 The application site includes 0.94 hectares of Green Infrastructure and unallocated open space. The Council's Green Infrastructure (GI) SPD quotes Natural England's definition of GI as "...a strategically planned and delivered network of high quality green spaces and other environmental features. It should be designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits for local communities. GI includes parks, open spaces, playing fields, woodlands, allotments and private gardens". The SPD sets out the acknowledged multiple functions of GI as:

- Setting the scene for growth, creating a good quality of place and quality of life and supporting sustainable economic growth;
- Supporting physical and mental health and well-being;
- Providing for recreation, leisure and tourism;
- Supporting the rural economy;
- Helping to manage flood risk;
- Supporting mitigation and adaptation to climate change;
- Positively benefitting the historic environment; and
- Enhancing the ecological network and promoting biodiversity.

3.5.5 Consideration of the loss of the GI and unallocated open space is appropriately assessed against paragraph 5, entitled "Green Infrastructure", of Policy 9 of the Local Plan Part 2, which sets out that:

Development involving the partial or complete loss of land identified as GI on the Adopted Policies Map or any unidentified areas of open space including playing fields; and any development which otherwise has the potential to result in the severance of GI connections, will not be permitted unless:

- i) The development can be accommodated without the loss of the function of open space;
- ii) The impact can be mitigated or compensated for through the direct provision of new or improved GI elsewhere or through the provision of a financial contribution to enable this to occur; or
- iii) The need or benefits arising from the development demonstrably outweigh the harm caused and the harm can be mitigated or compensated for so far as is reasonable.

3.5.6 It is accepted that the proposal will result in the partial loss of GI. Policy 9 does not, however, prohibit development in such circumstances, provided at least one the above criteria (i –iii) is achieved. As the proposal seeks to mitigate the partial loss of the GI / open space through a financial contribution (captured through a Section 106 Agreement) of £1000 per dwelling, it is considered compliant with criterion ii. This contribution will provide significant investment in the wider green network, including enhancements to Witton Park.

3.5.7 The proposal is also recognised as retaining a significant proportion of open space along the length of Tower Road, including retention of the avenue of trees. The area will be subject to environmental improvements to enhance and sustain its community value as a quality, functional space.

3.5.8 The benefits of Witton Park should also be recognised as mitigating against the partial loss of the GI / open space and, accordingly, is afforded weight in this assessment. The park is a vast expanse of public open space and woodland, access to which is immediately adjacent to the application site, offering a range of recreational opportunity to the local community and beyond.

3.5.9 The principle of redeveloping the redundant building and its associated curtilage as brownfield site is accepted, in accordance with the inclusion of that section of the application site in the Council's Brownfield Register; subject to appropriate consideration of ecological issues associated with the established presence of bat roosts within the building. The submitted Bat, Ecological and Tree Reports have been reviewed by Capita Ecology. They acknowledge that the removal of the building and trees adjacent to it will result in some loss of bat habitat and that a net loss of biodiversity might occur. It is, however, considered that the loss can be sufficiently mitigated through introduction of alternative bat roosts incorporated into the design of proposed new dwellings, installation of bat boxes on trees, prior to demolition of the building and through the minimised loss of existing trees and vegetation. Incorporation of proposed protection measures for trees to be retained should also be adhered to throughout on site operations.

3.5.10 An Environmental Management Plan should be created, to inform how the retained and created habitats are to be protected and managed in an ecologically sensitive manner, to ensure biodiversity of the site is retained or enhanced.

3.5.11 The following recommendations of the Bat Survey Report (Oct 2017) should be adhered to at all times during demolition of the building, to ensure robust mitigation to protect bat species present on site is achieved.

- On site supervision during demolition;
- Delivery of tool box talk to manufacturers
- Provision of an alternative permanent roost site provision eg. Bar boxes on trees and integrated bat boxes in new dwellings;
- Suitable lighting low level lighting design, directional lighting and avoidance of light spillage;
- Retention of trees and vegetation and a suitable landscaping scheme to include planting of additional locally native trees and shrubs.

3.5.12 The developer will also have a legal obligation to apply for an EPS Licence for bats, prior to the commencement of demolition works.

3.5.13 It is recommended that the ecological requirements are secured through application of appropriately worded conditions; subject to which the proposal is considered compliant with the requirements of The Framework and Policy 9 of the Local Plan Part 2.

3.5.14 Permission previously granted for the demolition of the Home for Older People and erection of a bat house to mitigate the loss of bat habitat (ref. 10/14/1329), is acknowledged. The bat house is, however, no longer required due to the design features to be incorporated within the new residential scheme, to provide an alternative habitat.

3.5.15 An affordable housing financial contribution (captured through a section 106 Agreement) will apply to the scheme, if the number of units developed is more than 10. Application of an appropriately worded condition is recommended to require the purchaser of the land to enter into the 106 agreement.

3.5.16 The principle of the proposal should also be guided by the Council's five year housing supply position. The Council cannot currently demonstrate a five year supply of deliverable housing sites – its supply stands at 3.6 years. In such circumstances, paragraph 14 of The Framework makes very clear that there is a presumption in favour of sustainable development. This is set out in paragraph 49 which clearly says that the relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites. This should also be read in conjunction with paragraph 47 which seeks a significant boost in the supply of housing. Where policies are out of date, as in the case in Blackburn with Darwen, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, considered against the policies of The Framework as a whole.

3.5.17 In the absence of any significant and demonstrable adverse impacts of the development, in the context of the presumption in favour of sustainable development, the sustainable location of the site and compliance with the Council's Local Plan Part 2 and Core Strategy Policies, the principle of the proposal is considered to be acceptable.

#### 3.5.18 Highways

As an outline application, full highways consideration will be applied to a subsequent reserved matters application, with regard to layout, vehicular / pedestrian access / movement and parking. A Transport Statement and a Travel Plan will inform a full assessment. It should, however, be acknowledged that an indicative access into the site is suggested from Tower Road and that each residential unit would benefit from dedicated off street parking, in accordance with the Council's adopted parking standards. Moreover, capacity within the site for up to an additional 15 off street parking spaces is anticipated for the benefit of existing local residents; serving to alleviate pre-existing parking issues in the locality, particularly along Hillcrest Road.

3.5.18 In respect of the demolition of the building; a Demolition Management Statement will be required through application of a condition, setting out how the demolition process will be managed to ensure that consideration is given to highway safety and residential amenity. The statement will include the following:

- The parking of vehicles of site operatives and visitors;
- Loading and unloading of plant and materials;
- Storage of plant and materials;
- Details of security hoarding;
- Wheel washing type and location;
- Control of dust and dirt;
- Recycling and disposal of waste.

3.5.19 Subject to the above, the proposal is compliant with the requirements of Policy 10 of the Local Plan Part 2.

#### 3.5.20 Amenity

Amenity issues will be addressed at reserved matters stage. At present a site layout is not proposed but it is indicatively suggested that the site can accommodate up to 30 units. The layout will need to demonstrate compliance with the Council's adopted space standards, as set out in the Residential Design Guide SPD, ensuring adequate separation is achieved between each new unit and existing dwellings at 4 Hillcrest Road and 6 Geddes Street, which adjoin the application site. The remaining dwellings on Hillcrest Road and those on Tower Road are sufficiently well separated from the site to ensure existing levels of amenity enjoyed by occupants of those properties is safeguarded.

3.5.21 The Council's Public Protection team has been consulted on the proposal and have reviewed a preliminary Phase 1 Desk Study. Application of the standard



contaminated land conditions is recommended, as is a restriction in the hours of demolition / construction; to safeguard residential amenity and provision of electric charging points for each dwelling; to help reduce the impact on air quality of the development.

#### 3.4.22 Design

Assessment of the design, including scale, layout and density, will be informed at reserved matters stage. The principles of Local Plan Part 2 Policy 11 and the Residential Design Guide SPD will be adhered to in order to ensure that the development presents a good standard of design, by demonstrating an understanding of the wider context and making a positive contribution to the local area by enhancing / reinforcing established characteristics. A range of detached and semi-detached family homes to accord with the Council's desired strategic housing offer will be provided.

#### 3.5.23 Drainage

The site does not lie within an identified Flood Risk Zone on the Environment Agency's Flood Zone Map. The Council's Drainage team has been consulted on the proposal and recommend application of a condition to require a foul and surface drainage scheme; in compliance with the requirements of Policy 9 of the Local Plan Part 2.

#### 3.5.24 Trees

The site accommodates a number of trees, primarily within the confines of the building and adjacent to Tower Road. A Tree Survey and accompanying schedule of works identifies a number of dead and low grade trees that are proposed to be removed. The Council's Arboricultural consultee is supportive of the proposal, including the removal of the trees, providing the development will include a comprehensive landscaping scheme to include replacement trees as well as incorporating the existing trees into the overall design.

#### 3.5.25 Summary

This report assesses the outline planning application for the residential development of land at Tower Road, Blackburn. In considering the proposal, a wide range of material considerations have been taken into account.

#### 3.5.26 In addition to the matters described above, local residents raised the following concerns:

*Protection of wildlife habitats of deer, rabbits, frogs and newts.* Of the aforementioned, only Great Crested Newts are afforded protection within the planning process. The application site is not identified as accommodating a Great Crested Newt habitat.

*Why not invest in converting the redundant building into sheltered accommodation?* The building has lain vacant for 5 years and its conversion is not considered to be financially viable.

*How did the Council originally acquire the land and at that time were any conditions / covenants placed on its acquisition regarding its future use?* The land was purchased by the Council in the 1960's from the Feilden's. No

covenants were attached to the purchase preventing the future sale of the land for housing development; as confirmed by the Council's Legal Department prior to the submission of the application.

*Has the Green Belt / Urban Boundary has been changed, in relation to the application site?* The boundary remains unchanged in the up to date Local Plan Part 2 (Dec 2015) from that defined in the 2002 Local Plan. No part of the application site is within the Green Belt or has been removed from the Green Belt.

*Loss of the "Village Green".* No part of the application site has a formal "Village Green" status.

## **4.0 RECOMMENDATION**

### **4.1 Approve subject to:**

Conditions which relate to the following matters:

- Application for all reserved matters must be made not later than the expiration of 3 years beginning with the date of this permission. The development hereby permitted shall be begun not later than the expiration of two years from the date of the approval of the last of the reserved matters to be approved. Details of the following matters (subsequently referred to as the reserved matters) shall be submitted to and be approved in writing by the Local Planning Authority before the commencement of any works:-
  - i) Appearance
  - ii) Access
  - iii) Landscaping
  - iv) Layout
  - v) Scale
- Requirement for the developer to enter into a Section 106 agreement relating to the payment of a commuted sum towards affordable housing ((‘x’ no. of dwellings x 60%) x 65% of average house price + (‘x’ no. of dwellings x 40%) x 35% of average house price); and £1000 per dwelling towards Green Infrastructure improvements in Witton Park. Only applicable if the number of dwellings to be developed at the site is more than 10.
- Submission of landscaping scheme to include enhanced biodiversity measures
- Implementation of Bat Survey (Oct 2017) measures
- Submission of bat box scheme
- Submission of Environmental Management Plan
- Demolition Management Statement
- Construction Management Statement
- Foul and surface water drainage scheme
- Foul and surface water to be drained on separate systems
- Submission of Arboricultural Method Statement

- Tree Protection during construction
- Site clearance works to be undertaken outside of the bird nesting season
- Submission of a contaminated land report
- Submission of validation of gas protection measures
- Unexpected contamination
- Submission of coal mining investigation and remedial measures
- Provision of motor vehicle charging points for each dwelling
- Limitation of construction site works to:
  - 08:00 to 18:00 Mondays to Fridays
  - 08:00 to 13:00 Saturdays
  - Not at all on Sundays and Bank Holidays

## **5.0 PLANNING HISTORY**

**5.1** The following planning applications relate to the application site:

10/01/0741 - Feniscliffe Bank Home for Older Persons: New car park (430 sqm), conservatory (75 sqm) and renewal of existing steel fire escape.

10/14/1329 - Feniscliffe Bank Home for Older Persons: Demolition of building and construction of masonry bat house to mitigate for loss of habitat for roosting bats. Planning application approved but could not be implemented due to declined licence from Natural England, which cannot be granted until a detailed application has been approved for redevelopment of the area.

## **6.0 CONSULTATIONS**

**6.1** Arboricultural Officer

No objection subject to the following conditions:

- Tree protection measures.
- Landscaping scheme.

**6.2** Drainage Section

No objection subject to the following condition:

- Submission of full details of the foul and surface water drainage system and construction phasing.

**6.3** United Utilities

No objection subject to the following conditions:

- Foul and surface water to be drained on separate systems.
- Submission of a surface water drainage scheme.

**6.4** Education Section

No response offered.

**6.5** Environmental Services

No objection.

## 6.6 Public Protection

No objection subject to the following conditions:

### *Noise*

- Site working hours to be limited to between 8am-6pm (Monday-Friday) and 8am-1pm on Saturdays. No works on Sundays or Bank Holidays.

### *Air Quality*

- Provision of a dedicated electric vehicle charging point at each dwelling.

### *Contaminated Land*

- Submission of a Desk Study and approved site investigation work (where necessary).
- Submission of validation to demonstrate effective remediation (where necessary).
- Unexpected contamination.

## 6.7 Highways Authority

No objection subject to the following condition:

- Submission of Demolition Traffic Management Statement
- Submission of vehicular tracking of the site for larger vehicles
- Submission of Construction Management Statement
- Submission a Transport Statement
- Submission of a Travel Plan.

## 6.8 Ecology

No objection subject to the following conditions:

- Implementation of the recommendations of the Bat Survey (Oct 2017); as per para 3.5.10

## 6.9 Strategic Housing

The Housing Growth Team would welcome good quality family homes in this location. The principle of residential dwellings and mix would be acceptable as initial proposals indicate a housing offer which responds to the Council's growth strategy. The Housing Growth Team is, therefore, supportive of the proposal subject to it meeting the Council's planning policies; including Affordable Homes provision either on site or off site through a Section 106 commuted sum payment.

## 6.10 Coal Authority

Initial fundamental concern expressed that the application site falls within a defined Development High Risk Area. Subsequent review of a Phase 1 Geo-Environmental Desk Study resulted in withdrawal of the initial objection; subject to the following condition:

- The submission of a scheme of intrusive site investigations for approval;
- The undertaking of that scheme of intrusive site investigations;
- The submission of a report of findings arising from the intrusive site investigations;
- The submission of a scheme of remedial works for approval; and
- Implementation of those remedial works.

6.11 Arboricultural Manager

No objection subject to following condition:

- Arboricultural Method Statement
- Tree protection measures
- Landscaping scheme

6.12 Natural England

Comments to follow in update report.

6.13 Livesey Parish Council

Objection for the following reasons:

- The view that the space is currently used as a community Village Green and that the space should be further developed to enhance this facility
- Loss of open space.
- Parking Issues.
- Loss of community space which is an important factor for local residents.
- Impact on access to Pleasington-both aesthetically and traffic flow / management within the area.
- If the area was to be developed would a retirement development be more suitable as there are a shortage of retirement developments in the area.
- There is a saturation of housing developments locally at Gib Lane, Heys Lane Eclipse Park and the Sappi Site.

6.14 Public consultation has taken place, with 60 letters posted to neighbouring addresses; a press notice was published on 24th November 2017; and four site notices were displayed on 14th November 2017. In response, 37 letters of objection have been received which are shown within the summary of representations below.

**7.0 CONTACT OFFICER: Nick Blackledge, Planner - Development Management.**

**8.0 DATE PREPARED: 30<sup>th</sup> January 2018.**

## 9.0 SUMMARY OF REPRESENTATIONS

### Objection Councillor Konrad Trapp (Meadowhead Ward):

I write as a Ward Councillor to express my surprise at the intention to use public open space for housing development.

Not only is it proposed to demolish the existing home but to take what was designated green belt up to adoption of the Local Plan 2 in December 2015.

The Council policy to withdraw from the direct Care of the Elderly in purpose built accommodation has resulted in the building being surplus to requirements

but it is also a community facility withdrawn.

There are limited opportunities for downsizing for older people across Blackburn and a small development

of bungalows on the existing home footprint would at least put a facility back into the local community. A similar development of 9

bungalows in Cambridge Close Darwen would be an ideal replacement scheme while retaining the present public open space.

This site is close to the main entrance to Pleasington playing fields and the open space forms a natural open entrance which will be

lost, even with the proposed retention of a green frontage of about 3 metres. This green space is also used by families as they enter

the playing fields or when they are leaving, it is a convenient area to prepare younger children for their walk into or away from the park.

The financial benefits to the Council in terms of land sale, extra housing and subsequent council tax are small in relation to the overall

plan for 9360 dwellings but the impact on the local community will be disastrous. They will lose open space which has been used since

1943 as verified by a local resident. Is the council uncaring for the local community and the benefits of this land in their pursuit of maximising

housing completions and income. There are numerous brownfield sites which need to be addressed as part of the housing replacement programme.

120 affordable homes annually are part of the local plan which is presently being subsidised by short term opportunism of renovating empty properties

which are not as cost effective but faster than providing new build.

Resident Parking is a real issue in this area with those living on Preston Old Road parking on Hillcrest Road. An alternative to this would be a parking

arrangement similar to that near Witton traffic lights where residents are permitted to park with two wheels on the pavement up to a white line, there

is room for such a scheme leaving more width than at Witton.

I trust you will take these suggestions into consideration when deciding this application and the widespread feelings of unrest from the local community.

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## Objection Mrs Newton, 34 Tower Road, Blackburn

Dear Sir/Madam,

I would like to register my objection and oppose the development of Feniscliffe Bank & Tower Road site.

As per the outline planning application pdf's on line from your web link from the letter dated 14th November 2017

Clearly the site plan has been redrawn to encompass green belt land, parkland & public land.

Going forward I would like to be consulted before design principles are in place.

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## Objection Brian & Margot Hester, 42 Tower Road, Blackburn

We wish to give the following objections to the proposed redevelopment.

1. As Tower road is used as access to both Pleasington Fields and Witton Park traffic at times gets very heavy. This is especially true when there are events held in the park eg Horse Club meetings, Bonfire night and the Easter Fair.
  2. Funeral processions use Tower Road for access to the crematorium and the Asian community for celebrating their various religious ceremonies. With more houses being built the traffic congestion and parking will become a serious problem.
  3. The field around the present building is used by local children to play and organise games . within sight of parents and child minders.
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## Objection C & T Pass, 47 Hillcrest Road, Blackburn

Dear Mr Blackledge

We wish to register our strong objections to the outline planning application 10.17.1378 which concerns the land of Tower Rd, BB2 5LE.

We are particularly concerned about the proposal to incorporate the green belt area / community open space that is adjacent to the old Feniscliffe Bank Site.

We feel it is wrong for Blackburn Council to take away this land that is much utilised by many different people in this community. As senior citizens we regularly use this area for exercise as it is so close to our home. Unfortunately advancing years means that there are limitations on how far we can walk and like many of the older people who use this green open space we would be seriously disadvantaged to be denied access to same.

We are also seriously worried about the extra traffic this proposal will generate into what is an already strained situation.

We thank in advance for your time taken to process this objection.

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## Objection David Mullally, 19 Hillcrest Road, Blackburn

Good afternoon,

Firstly can I take this opportunity to say how disgusted I am that my council could even consider building on the land adjacent to my property. It is a beautiful piece of land which has uninterrupted views of pleasington.

Secondly, you are planning to build over thirty dwellings with only 15 car parking spaces. I have worked in construction for keepmoat for over 11 years and I am fully aware that statistics show that there are two cars per household. That's 45 cars without a space. The parking situation on Tower Rd and Hillcrest road is already chaotic to say the least. We already have to accommodate cars from residents who live on Preston Old Road.

Thirdly, I am lead to believe that the site entrance will be directly across from my house. I have 3 young children who play outside our front gate and play on the field you are thinking of building on. I believe this would be a massive Health and Safety issue

Finally, myself and all of the other residents living in this area are appalled at this application and have vowed to do everything in our power to put a stop to this ludicrous idea. You are not only going to breach our sunlight but you are also going to destroy the beautiful wildlife in and around this area aswell as cause a massive disruption to all who live here.

Thankyou

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## Objection David Veevers, 50 Tower Road, Blackburn

Dear Mr. Blackledge

I would like to take this opportunity to formally object to the planning application reference no: 10/17/1378 for the Land directly opposite to my house on Tower Road. We as a family, along with our neighbors are regular users of the field opposite, with dog walking and gentle sports with my children, and their children also. I do not understand why this development application has to include the land next to the old peoples home that is to be demolished. The area has been a green site for over 50 years, and is not a brownfield site This is our village green that has been providing for the local residents for generations and would appreciate it if you would take this into consideration before granting permission to develop the area.

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## Objection Paul Preston

Comments with regards to planned redevelopment of Feniscliffe Bank Home REF 10/17/1378

Dear Nick Blackledge and Ian Richardson

My name is Gemma Mcguire living at 20 tower road with my partner and two young children; I have lived here for 7 years being part of a small community. We have been lucky to allow our small children to play on what we refer as the village green. It was brought to our attention that the old residential home would be being knocked down and potential housing had been planned. More recently we have been informed that the plans go close to the trees near the main road. I have concerns regarding this it will cause more pollution, minimal playing area for the children.

Local resident's regularly access the green for dog walking or walks down into the park. As you are aware that Tower Road is the last road prior to the run of the cemetery I personally don't want to see more houses being built so close to the entrance especially when saying good bye to a loved one. The green now creates a period of tranquillity. The road can be busy at weekends for football and mobile air craft. The Asian community utilise Tower Road and it can be very busy for Eid celebrations with additional houses this would increase traffic flow. From a spiritual, cultural and community aspect I would hope that this would contribute to a fair decision

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## Objection Jack Ellison, 1 Hillcrest Road, Blackburn

**This planning application for the land situated between Tower Road, BB2 5LF and Hillcrest Road, BB2 5LE cannot be given approval as it contravenes Blackburn With Darwen Borough Council's Local Plan Part 2 Site Application and Development Management Policies, Green Infrastructure Network Policy 38 which has outcomes/targets (2011-2026) which states**

**“ NO LOSS OF GREEN INFRASTRUCTURE “**

(please see extract from Local Plan Part 2 on page 4 of objection )

The Green Infrastructure concerned in this application is highlighted on the Adopted Policies Map, Blackburn Section, 2015. (see page 5 of objection )

The boundary of this parcel of Green Infrastructure is clearly visible on the enlargement of the relevant section of the map as shown on page 6 showing its position in relationship to the existing buildings of Feniscliffe Bank Home for the Elderly (disused).

A plan of the existing site extracted from the planning application is shown on page 7 .

A version of this plan with the Green Infrastructure superimposed upon it is shown on

Page 8 showing the extent of green infrastructure on the site.

The plan of the Indicative Development Proposals in the planning application states “That a proportion of the site will remain as open space...” ,the outline of which is indicated. (see page 8b of this objection)

This "open space" area as shown on the application represents a reduction of green infrastructure from approx. 0.563 hectares to approx. .315 hectares . A loss of around 44%.

The potential site access shown on this plan ,if used, would further reduce the size of the green infrastructure, splitting it into two separate plots and so make it useless for some recreational activities such as cricket or football.

(see plan of indicative development proposals amended to show loss of green infrastructure, if planning application accepted , on page 9.)

The site with Green Infrastructure kept intact in accordance with B.W.D Borough's Adopted Local Plan would reduce the amount of land available for housing development and so the number of homes as stated in the application (30) should be reduced accordingly.

The outline planning application , on its introduction page, states that the existing open space is of low quality. This is not true.

(the middle photograph on page 5 of the CAPITA/B.W.D . application shows rough land situated through the park gates which is outside the boundary of the site in question.)

The grassland is of good quality, mainly flat and well drained and has been used by people of the Borough for over forty years for recreational purposes. ( see photograph of green, page 10 of this objection.)

The openness and position of the green has allowed children to play on their own without direct supervision whilst being "kept an eye on" by parents and neighbours , giving them independence and responsibility helping them to develop and keep fit in a safe environment.

If the Green Infrastructure Network is reduced on this site it would defy Blackburn With Darwen Core Strategy Adopted January 2011.

An extract from this core strategy is shown on page 11 of this objection.

If the planning application left the Green Infrastructure intact, allowed for the building of less, but high quality dwellings, and demolished the disused home for the elderly on the site, I move it would be advantageous to all parties concerned.

The people and children of the Borough, though losing a substantial area of green open space, would be able to continue with their recreational activities.

The residents of Tower Road and Hillcrest Road would be free from a derelict building in the neighbourhood.

Blackburn with Darwen Borough Council would , by sale of the development site, be able to offset the cost of demolishing the existing disused building and installing bat habitat measures.

The council tax collected from the high end dwellings would mitigate the cost of maintaining the Green Infrastructure Network on the site in the future.

I therefore submit for the above reasons that the Council rejects this plan in its present form.

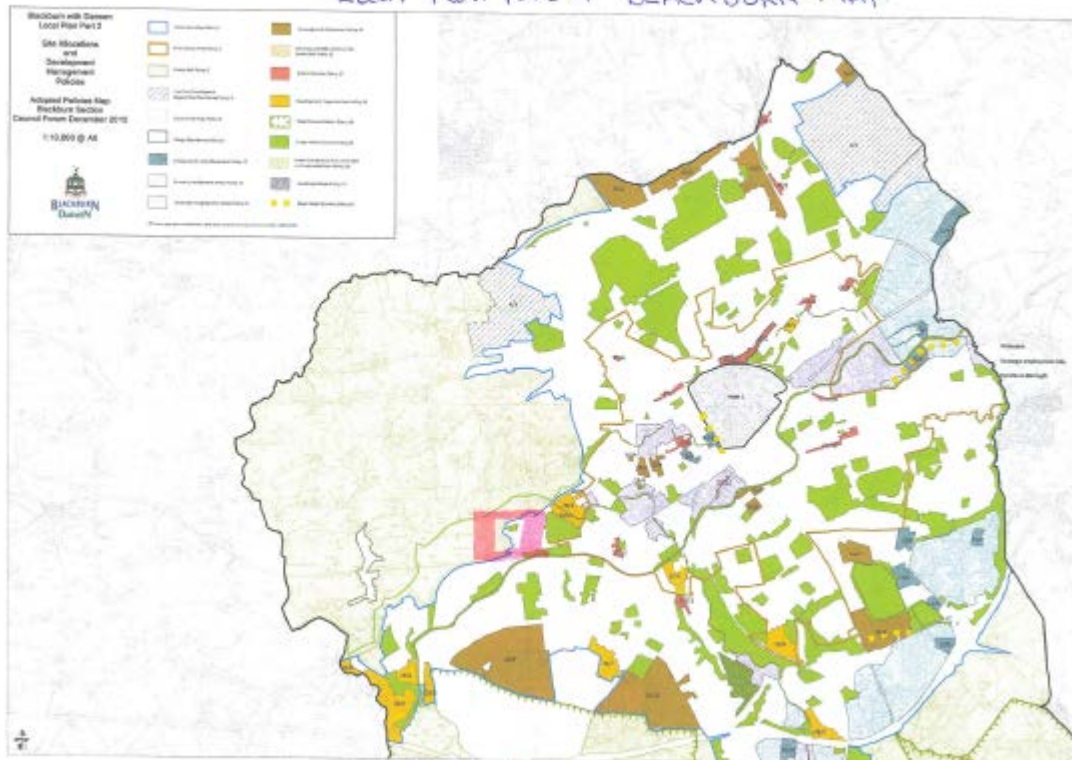
Please note that I wish to be consulted before the design principles are in place for this site and that I wish to be notified of the time,date and place of any Council meetings regarding this or any other planning applications pertaining to this site.

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Core Strategy Policy	Local Plan Part 2 Policy	Outcomes / Targets (2011-2026)	Indicators
CS19 Green Infrastructure	38 - Green Infrastructure on the Adopted Policies Map 40 - Integrating Green Infrastructure with New Development 9 - Development and the Environment	<ul style="list-style-type: none"> <li>No loss of Green Infrastructure networks</li> <li>Creation of new Green Infrastructure networks</li> <li>Open Space Strategy targets</li> <li>Public Rights of Way targets</li> </ul>	<ul style="list-style-type: none"> <li>Amount of S106 monies received for public open space</li> <li>Data on the amount and quality of open space within the Borough (through Open Space Audit)</li> </ul>
CS20 Cleaner, Safer, Greener	8 - Development and People		<ul style="list-style-type: none"> <li>Amount of new development achieving Secured by Design</li> <li>Number of Air Quality Management Areas</li> </ul>
CS21 Mitigation of Impacts / Planning Gain	12 - Developer Contributions		<ul style="list-style-type: none"> <li>S106 allocations</li> <li>Number of S106 agreements signed</li> <li>Amount of S106 contributions secured (gross)</li> <li>Amount of S106 contribution secured towards affordable housing</li> <li>Amount of S106 contribution secured towards transport</li> <li>Amount of S106 contribution secured towards education</li> <li>Amount of S106 contribution secured towards open space</li> <li>Amount of "other" S106 contribution</li> </ul>
<b>Spatial Intervention 6: Access to jobs and services</b>			
CS22 Accessibility Strategy	10 - Accessibility and Transport 45 - Major Road Schemes 46 - Rail Freight	<ul style="list-style-type: none"> <li>10% increase in bus patronage by 2011 (LTP2)</li> <li>15% increase in rail patronage by 2011 (LTP2)</li> <li>22% increase in number of cyclists entering Blackburn and Darwen town centres (LTP2)</li> <li>15,000 new SMART cards to be issued by 2010/2011 (LTP2)</li> <li>The Council will aim to increase the satisfaction with public transport and information to Royal Blackburn Hospital for</li> </ul>	<ul style="list-style-type: none"> <li>% of new residential development within 30 minutes public transport time of a GP, Hospital, Primary and Secondary School, Employment and a Major Retail Centre</li> <li>Number of planning applications refused on grounds of poor accessibility</li> <li>Bus patronage</li> <li>Rail patronage</li> <li>Number of pedestrians entering Blackburn and Darwen Town Centres</li> <li>Number of cyclists entering Blackburn and Darwen town centres</li> <li>% of residents with SMART cards</li> <li>DfT core indicators, focusing on journey time - report on these through delivery report process</li> </ul>

Appendix 3 – Monitoring Framework  
Page 150

Local Plan Part 2 BLACKBURN MAP



Page 5

Page 5



Existing Site Plan  
Tower Road, Feniscliffe, Blackburn, BB2 5LE




1:500 @ A1






Existing Site Plan - SHOWING GREEN INFRASTRUCTURE  
 POLICY 38  
 Tower Road, Feniscliffe, Blackburn, BB2 5LE  
 1:500 @ A1



Legend:

-  Site Boundary - 1.29ha
-  Existing Trees on Site
-  Buildings to be Demolished

-  Site boundary - 1.29ha
-  Site of vacant home for older persons - 0.35ha
-  Existing greenspace - 0.94ha

page 8







GREEN INFRASTRUCTURE  
 B.W.D. LOCAL PLAN  
 PART 2.

# Indicative Development Proposals Tower Road, Fenisccliffe, Blackburn, BB2 5LE

N  
1:500 @ A1



Legend:

- |  |  |
|--|--|
|  Site Boundary - 1.29ha           |  Existing Site Access                               |
|  Proposed Area for Development    |  Potential Site Access (to be investigated further) |
|  Proposed High Quality Open Space |  Existing Tree Line Retained Where Possible         |

Indicative Development Proposals **SHOWING LOSS OF GREEN INFRASTRUCTURE**  
 Tower Road, Fenisccliffe, Blackburn, BB2 5LE **POLICY 30**  
 1:500 @ A1



- Legend:
- Site Boundary - 1.29ha
  - Proposed Area for Development
  - Proposed High Quality Open Space
  - Existing Site Access
  - Potential Site Access (to be investigated further)
  - Existing Tree Line Retained Where Possible

**LOSS OF GREEN INFRASTRUCTURE.**  
**IF OPEN SPACE LEFT AS INDICATED ON**







These green networks will provide a number of functions, which may include:

- i. Recreation
- ii. Access to the countryside
- iii. Flood defences
- iv. Sustainable surface water drainage systems (SUDs)
- v. Biodiversity and movement of species
- vi. Visual amenity
- vii. Urban cooling and air quality improvements
- viii. Improving health
- ix. Education

New development will be required to be designed so as to facilitate such networks where appropriate.

New development likely to affect the functioning, or potential functioning, of an area of open space as part of the Green Infrastructure network will only be permitted where there is no unacceptable adverse impact on these issues.

2. Masterplans or other regeneration programmes in areas of change will create high quality public open spaces as part of their proposals. This will involve the improvement of existing spaces and / or the creation of new ones.

3. All new residential development will contribute to the provision of high quality open space for its residents, either through provision of public open space on site or, where more appropriate, through financial contributions towards improving the quality and accessibility of nearby existing spaces.

#### Green Infrastructure

- 11.12 Green Infrastructure takes the principle that open spaces work as a network providing a variety of functions. It is an issue that cuts across local authority boundaries and is therefore most appropriately dealt with on a joint basis. This is recognised in the former RSS, where Policy CLCR3 promotes the unique green character of the Central Lancashire City Region for the advantages it offers for recreation and for attracting people and investment.
- 11.13 The Lancashire Green Infrastructure Strategy (draft published 2008) sets a number of actions relevant to the Core Strategy:

## Objection Mr & Mrs T Pass & Miss J Pass

10/17/1378 Outline Planning Application with all matters reserved for residential developmmt (up to 30 Dwellings) Demolition of existing buildings and associated works including bat mitigation measures. at Land at Tower Road , Blackburn , BB2 5LE. Case Officer: Nick Blackledge

Dear Mr Blackledge

I write on behalf of my parents who reside at 47 Hillcrest Road, Blackburn BB2 5LF and who object to the proposed planning application stated above.

We have lived on this road for over 50 years and are disgusted by the way the council has gone about pushing this application through without adequate consultation with the residents. We have only received one letter dated the 14th November and have never been invited to a public meeting to discuss how this will affect us.

Please can you explain the following:

- Why the boundary of the vacant home of the elderly has been extended to cover the majority of the field?
- Lack of resident parking - by building more homes will exacerbate this especially when residents in neighbouring roads park on Hillcrest Road - how are you going to mitigate this?
- Bottle necks of traffic from the Pleasington Fields and Crematorium - the traffic becomes intolerable especially at weekends - again how are you going to solve this?
- Play area for children - currently the large field has been a welcomed and safe environment for children to play within view of their homes - how do you plan to ensure green space for families and children is available?
- The vacant home for the elderly - why cant you invest money in the current building and make into a sheltered accommodation as there is nothing wrong with the structure of the building rather than spend money knocking it down. There was nothing wrong with the home all the residents enjoyed living there?
- There are plenty of other areas within Blackburn that require regeneration i.e. Griffin, Highfield/Mosley St. Can you explain why our area has been chosen for this development plan?

I feel another public meeting needs to take place urgently with all residents to discuss this further.

We look forward to hearing from you.

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## Objection John Collins, 24 Tower Road, Blackburn

Dear Sir ,

I wish to register my concerns about the above stated planning application. When residents of Hillcrest road are at home in the evening the road is fully parked on both sides and it is almost impossible to get public service vehicles , such as ambulances or fire brigade down this road .

The vague proposal to include 15 resident spaces , which I assume are for Hillcrest road residents is not enough. As well as the terraced property , the semi detached properties , barring one , do not have individual driveways , so more off road resident parking is needed .

We wish to be consulted before design principles are in place, as the siting of the homes can have an important impact on the visual effect of the overall development .

I also wish to register opposition to the potential 3rd exit in to Tower road , as this will further reduce significantly the small amount of green space left .

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## Objection Karen Atkins, 361 Preston Old Road, Blackburn

To Whom it may concern

I would like to raise a concern and objection to the proposed building of 30 new homes on the former land of Feniscliffe Bank home for the elderly situated on Hillcrest Road/Tower Road, Feniscliffe, Blackburn. I also object to the Homes being built on the land/Field adjacent to Feniscliffe Bank. The field is utilised by the community of Feniscliffe and it was my understanding that the land is for the community, the land provides a safe place for children to play as well as the community as a whole.

Another reason for my concern is that parking is an issue already in the area for the residents and this would cause further strain on the situation, should 30 new homes be built. I think this would also compromise peoples safety. Cars currently park on the kerb outside the nursing home, making it difficult to walk on the pavement. I have personally witnessed parents with prams and young children and elderly people, struggle to walk on the pavement.

I am also disappointed that I wasn't made aware of a meeting that took place in the last couple of weeks. I live on Preston Old Road, Blackburn and did not receive a letter inviting/making me aware of a meeting taking place. The residents that live on Preston Old Road, Willis Road, Cecelia Road, St Francis and Feniscliffe Drive are also affected by these changes and utilise the land on Tower Road also.

Your assistance in this matter is very much appreciated.

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Objection Lorcan Moriarty, 27 Hillcrest Road, Blackburn

FAO Nick Blackledge

**RE: PLANNING APPLICATION NUMBER 10/17/1378 LAND AT TOWER ROAD  
BLACKBURN BB2 5LE**

Dear Nick,

I write to you regarding Blackburn with Darwen Borough Council's recent notification of a planning application for land off Hillcrest Road and Tower Road in Feniscliffe, Cherry Tree, Blackburn.

The application is of huge importance to me, as Feniscliffe Bank is situated directly opposite my terraced home (number 27) on Hillcrest Road.

I accept that the home was always going to be demolished (even though seems a shame, as the current building is an interesting example of 1950s architecture, and complements the local architectural vernacular).

I was under the impression that it was going to be accommodation for the elderly, as this is what has been consistently publicly voiced by the council for several years. Additionally, I was under the impression the land was classified as set aside for social residential (namely for the elderly). Additionally, it was also publicised that the development would be within the current boundaries of Feniscliffe Bank.

When referencing a variety of sources (including the CPRE's website) a significant proportion of the land allocated for development within the proposal appears to fall (historically) within Green Belt. Therefore, I'd like some clarification from the council on when the boundary changed, or whether indeed the boundary shown on BwDBC's website is accurately positioned, and if this is the case, why it wasn't considered of importance to notify local residents immediately adjacent to green belt land. I appreciate that this would have been a time consuming exercise, but given the potential ramifications, I would have imagined that this would have been a considerate thing to do. Additionally, the boundary between the plan for Brownfield Registration in September/ October 2017 showed a smaller parcel of land. The application to which I now write to you about has now actually increased the size of the development to border right up to the boundary of Pleasington Playing Fields.

Additionally, on the (interactive) Blackburn Local Plan Map (which is no longer available to see), the land to the immediate North of Feniscliffe Bank was previously shown to be "protected open space". There is no longer a reference to this on Blackburn with Darwen BC's website, as the interactive plan has been removed. This was a plan with a variety of layers, that could be turned on and off, and utilised in order to ascertain land categorisation. I think it's fair to say that the majority of residents believed that this land to the north was indeed protected space, and that the remainder of the land that sat outside of this protected green space and the boundaries of Feniscliffe Bank was Greenspace, which meant that they felt secure that this green space would not be put forward for development.

An application for the land to become a Village Green was looked into by local residents, but there was a belief that there was a covenant on the land, that gave it protected status dating back to the time of the Feildens. I regret to say that, as far as I am aware, an application was therefore not submitted. I feel it's important to note that the site fits the criteria for a village

green in every sense. It is used year round as an amenity space, and one of great value to the local community. Children use it all throughout the summer, as it forms a safe space within view of the adjacent properties. This allows children a sense of independence, whilst allowing for parents to still be able to see their children. This is probably one of the main reasons for the houses on Hillcrest Road and Tower Road being so popular. In an age where children are increasingly confined to their houses due to the advancement of technology, and the perceived and real dangers of modern society, spaces like this should be cherished. I accept that the proximity to the park could be seen to offset this loss, however, a trip to the park requires adult supervision, which removes the independence of children to go out and explore.

Blackburn has a significant number of existing, brownfield sites. Sites where buildings have long gone, housing once stood, but that development has not progressed (for example Griffin and Mosley Street amongst others). If developments had been completed here, and the houses had all sold or been occupied, then the people of Hillcrest Road and Tower Road might be more likely to reticently accept that there was a genuine need for housing that was proven by a real demand. Sacrificing pristine greenspace whilst leaving derelict land seems to be an inadequate focus of resources. Reducing the green space of a town whilst retaining rubble strewn landscapes in other areas seems to me to be detrimental to the overall built fabric of a town, and leaves areas feeling neglected, and others feeling a loss of character, and the essence of what makes them desirable places to live.

I think it's also relevant to note that Lancashire Evening Telegraph reported that Blackburn with Darwen has 1,535 empty homes at present. This is a huge number, and highlights that the issue isn't necessarily the lack of affordable new housing but the policy on bringing existing homes back into use. On the presumption that these 1535 empty properties could on average provide housing for 4 person families, this would create housing for an additional 6140 people, without altering any of the existing built form of Blackburn. Additionally, there is a huge number of houses being built in Blackburn already, which raises the issue of why this high value amenity land is being submitted for development for what is in effect a very small number of houses (in terms of government targets).

Parking is already very difficult on Hillcrest Road, with residents from Preston Old Road (who have restricted parking in front of their homes) utilising Hillcrest Road. This is to be expected, however, any new development must take this into consideration. The plan clearly indicates that 15 spaces are to be allocated for residents parking. Clarification is required on this with respects to which residents: residents of the proposed development, or existing residents of Hillcrest Road and Preston Old Road. Additionally, if a development is to go ahead, I'd be inclined to suggest that 30 spaces would be a more realistic number to accommodate for local residents.

I'm aware that whilst there is no right to a view, however, I'm concerned (given the lack of plans to comment on) with regards to the boundary line of any newly proposed buildings. I'd always assumed that any new building would sit within the footprint of the existing building. I imagine that if any built form was to be brought closer, residents would likely be much more hostile to any development. Given the issues with parking, and the fact that most of the land is currently amenity greenspace, there is definitely scope for creating a green barrier around the entire extent of any new development, that would create a healthier environment for both the new development and existing residents. It would also provide some form of refuge for some of the wildlife that currently utilises the open space as valuable habitat.

What is often overlooked is the effect of development on wildlife: there is a significant population of migratory swifts that nest on Hillcrest Road annually. Swift numbers are struggling in Britain due to the changing nature of new developments. I'd like to see this taken into account and lend a helping hand to nature by utilising swift bricks in any new developments. This has been successfully carried out on other recent developments.

There is also a significant population of hedgehogs which can frequently be seen on the green throughout the spring and summer (there are public records of these sightings on the People's Trust For Endangered Species' "Big Hedgehog Map"), which in the next ten years are likely to become a protected endangered species in the UK given the precipitous drop in their population (currently around a million, down from a population of around 30 million in the 1950s).

Drainage into the park: I just wanted to ensure that if any development goes ahead, that SUDS will be utilised to ensure no run off into Pleasington Playing Fields occurs.

Traffic calming measures: vehicles regularly exit the park in excess of 45mph, so some traffic calming measures would be welcome. The park gates are rarely closed at the times stated on the regulation sign for the playing fields, and ideally this would be addressed.

Whilst I'm not overly enamoured with the idea of development of the green, if it does go ahead (and I'm certain development will go ahead on the current land of Feniscliffe Bank), it is essential that any development is done sensitively, in terms of both the local architecture, environment, and valid consultation with local residents. Too many new developments don't fit aesthetically within the surrounding architectural vernacular. Research undertaken by the Future Homes Commission found that only 1 in 4 people surveyed would choose to live in a new build home over a period property. According to an article by Roger Graef in the Guardian on the 26<sup>th</sup> October 2012, the reasons are "Not enough space in the rooms. Not enough storage. Not enough natural light. And not enough flexible spaces for communal and private living or changes in the household over time. In other words, they don't think new homes are built for the needs of modern families in the ways that Victorian and Edwardian houses were. And in too many cases of new development consumers are absolutely right. Riba's Case for Space report showed the size of new homes in the UK is well below that of Ireland (15% bigger), Denmark (53% bigger) and Germany (80% bigger) – and shrinking." With this in mind, perhaps the new buildings should recreate the existing buildings of Hillcrest and Tower Road.

I actually have the original hand drawn architectural plans for Hillcrest Road from 1908 (these are available from Lancashire Records Office in Preston). I'm happy to provide these to the council as a blueprint for the development, that would allow a completely seamless development in terms of architecture, and one that provide new family homes that were desirable as they match the proportions that make period properties so desirable. As an aside (and a personal bugbear) I'd be loathe to see a development where a garage was designed into the overall frontage of a house, as I personally think it gives undue importance to a car in what should be a family home, for people to live in. At present, we're being asked to comment on a generalised area plan. By trade, I'm a Chartered Landscape Architect, so deal with design of open space on a daily basis (and have done for 11 years), so with no concrete plans to comment on, my professional opinion if the development is to go ahead, would be as follows:

- The perimeter of the new development to be bungalows: this could be classified as housing for Blackburn's more elderly residents: people who no longer have the mobility to maintain a large multi storey family home, but who still want to remain in their local

communities. This would mean that they retained their independence and wouldn't have to tackle any stairs. It would also offset the sense of any encroachment on existing housing, which is what currently makes Hillcrest and Tower Road such a desirable location, with a sense of open space.

- The incorporation of a green barrier that created a distinct open space between the new development and the existing development. This could be seen as a linear park, providing amenity value for the new residents, and retaining open space for the existing residents and future generations. This could incorporate play features for children or social spaces for residents. A community orchard, wildflower and tree planting to help integrate the space within the surrounds of Pleasington Playing Fields and Witton Park.
- The incorporation of best practise in terms of BREEAM and green technology. Green roofs, SUDS, swift bricks, bat boxes, native planting, retention of open green space.

I look forward to hearing of any developments and working with the council to find a resolution.

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## Objection Margaret & Russell Fish, 40 Tower Road, Blackburn

Dear Sir

May we place on record our objection to the above planning application on the basis of the following issues:

- Our understanding, from discussions with one of your councillors, was that the land in question was afforded village green status and as such would never be developed. Removal of this land would deprive local residents on the green infrastructure they have enjoyed for many years. Children play for hours and hours on this green on a regular basis and dog walkers also exercise their pets daily. In addition, the properties down Tower Road are currently not overlooked and we believe this development will not only change that, but will lead to a loss of our privacy. Currently we have an open aspect to the front of our property and would not like to see this removed by this unnecessary development.
- The proposed plan is out of scale in terms of its size compared with the existing development, and would result in removing the spacious aspect of the neighbourhood and a catastrophic loss of green infrastructure for the area.
- The area is currently a very pleasant place in which to live due to the open aspect. This proposed development would totally change the character of the neighbourhood due to the visual impact of the properties and would also affect the community spirit enjoyed by those of us who use this space.
- The proposed development
- The current parking situation in the area is also of huge concern. Currently residents of Hillcrest Road have to share the limited available on road parking with those residents of Preston Old Road due to the parking restrictions imposed on the main road. The proposed plan appears to have two access roads into the development, which would remove a large portion of the available parking space on Hillcrest Road, thus forcing residents to park on Tower Road. There is also a proposed access road exiting on to Tower Road directly opposite our property. With the additional parking and vehicle movements into/out of the development along with current traffic into the park, not to mention Funeral corteges, and the proposed Council plans to increase the use of the park facility, this would seriously affect the safety of this road and be a massive inconvenience to local residents.
- The additional vehicle movements and increased number of vehicles in the vicinity will create serious access issues for the emergency services.



We feel the best use of this site would be to provide luxury 1 or 2 bed accommodation, within the existing footprint of Feniscliffe Bank, for the over 55's that they would/could purchase, rather than a 'Sheltered' accommodation unit. There is no property of this type available for elderly residents of this neighbourhood to enable them to 'downsize', thus creating the availability of the family type accommodation you seem to require from the proposed development. In addition, the Council would still be receiving the Council tax income from a similar number of properties.

We trust you will give our concerns due consideration.

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### Objection Michael Gardiner, 46 Tower Road, Blackburn

Dear Nick,

I am writing to object to the outline planning application reference 10/17/1378 for the land opposite my property on Tower Road.

My family and neighbours use the field regularly for playing football and cricket and we walk our dog around the field twice a day. Whilst there is some provision for open space directly opposite our house, it will not be big enough to play ball sports and the plan appears to have an access road bisecting this open space.

Whilst I understand that the former old people's home needs to be redeveloped, I do not understand why what is effectively a village green next to it has been included in the planned development. This is clearly not a brownfield site as it has been green for at least fifty years.

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### Objection Ruth Hadwin, 41 Hillcrest Road, Blackburn

I wish to register my objections concerning the outline planning permission for the residential redevelopment of land at Tower Road, Feniscliffe. (Ref: 10/17/1378)

I live on Hillcrest Road, opposite the site, and my concerns cover five points:

1. Access

- a. During the demolition and building process

Hillcrest Road is a narrow road with cars parked on both sides of the road. If large vehicles travel along the road, I am concerned that cars will be damaged and parking will be affected. Large vehicles will not be able to access the site via Geddes Street. This is also an extremely narrow road and difficult to turn into as cars and vans are parked on either side.

b. Re-use of existing access points for the new houses

Hillcrest Road is a narrow road and I am concerned that there will not be enough room for additional traffic to travel in both directions along the road.

2. Parking

At the moment, parking is an issue on Hillcrest Road as all residents on this road, residents from Preston Old Road that back onto Hillcrest Road and customers for the local businesses on Preston Old Road all park on both sides of the road. If houses are built with drives that face Hillcrest Road, I am concerned that parking on that side of the road will be lost and there will not be enough space for existing residents to park. I have read in the planning, design and access statement that existing parking will not be affected but I cannot understand how this will happen.

3. Use of Greenbelt Land

I disagree with the use of greenbelt land to build houses. I am concerned that there could be a historical preservation order on the land.

4. Bat Habitat

I hope that you will ensure that the builder creates a bat tower in time for the bats to make their hibernation or maternity roost before the demolition of the building.

5. Loss of Views / Becoming Overlooked

- a. I bought my house specifically as I face the small car park and garages of the Nursing Home. Therefore, I am not overlooked and I have views from my upstairs windows to Hoghton Hill. I am concerned that if houses are built up to the boundary of the site, I will be completely overlooked and lose the views.
- b. My neighbours that face the grassy area will also become overlooked by residents of the new houses and will lose the grass opposite their houses where their children play.

I hope you will consider my objections and I wish to be consulted before design principles are put into place.

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## Objection Mr & Mrs Howorth, 38 Tower Road, Blackburn

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To whom it may concern

We write in regard to the above planning application. We would formally like to object to the current plan. As residents of Tower Road for over 16 years we think that the plan as it currently stands does in no way benefit the local community of Feniscliffe. The original submission which was muted approximately 4 years ago prior to Feniscliffe Bank closing down was to replace the care home with new housing which would be more suited to people over the age of 50 i.e. older people who maybe wish to down size their current housing needs.

Currently there is insufficient supply in the local area of housing that is suited to older people, the development of the former Feniscliffe Bank Care Home into a small development of housing within the current boundary of the above would more facilitate the needs of the older community within the borough. The area that the council wishes to develop is planning on using part of the local green community space which surrounds the proposed development site. This Green Space has been used for over 70 years by the people of Cherry Tree and Feniscliffe. We ourselves have used this area since we moved here, to bring up our son, walk our dog. This area was and still is used on a daily basis by local residents to play with their children, grandchildren and in some cases great grandchildren. In addition to this local dog owners who use this area, fastidiously clean up after their dogs. Which is more than can be said for other areas of the town, this shows the high regard residents of the area hold for this small area of land.

We would like to point out the following

- Parking for existing residents is already in short supply without adding to this with a further 30 houses.
- Restricted access for emergency services if the development is allowed to proceed in its current layout.
- Removal of much used green space.
- Parking issues on Tower Road, which suffers when events are held within Witton Park we have had our drive blocked on numerous occasion over the years when events are held.
- Access to Pleasington Cemetery if parking is allowed on both sides of Tower Road this will lead to access issues for funerals at Pleasington.
- A Road which would split the field in two is not suitable.

We fully appreciate the councils need for housing requirements to meet the local plan. However, the supply of 30 houses on this very small plot of local green space is not really needed within the area. There are already several large-scale housing developments currently under construction as well as other planned large-scale projects to start within the next year. We as local residents would much prefer to see the former Feniscliffe Bank site developed within the existing boundary to supply much needed housing for older people, but within a new scheme allowing for much need access and parking both for existing and new residents. Plus, the provision of greater access for emergency services. Also, the possibility of placing parking restriction on Tower Road and the provision to leave the current green space undeveloped.

We look forward to hearing the council's response and views to ours and other residents of Tower Road and Hillcrest Roads views on this matter.

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## Objection Mr & Mrs Newton. 34 Tower Road, Blackburn

As residents of Tower Road,

We would like to raise our concerns with regards to the development at Feniscliffe Bank Home.

Originally the plan was to use the Feniscliffe Bank plot only for the development of a retirement village within the care home grounds.

We feel this plan would benefit the area in a much better way than the proposed 30 houses which would also be taking up all of the green space.

It has also been corresponded to us regarding rehoming of the bats. How would the bats be catered for if the housing development was to go ahead?.

Over the years the green has been used by all residents of both Tower Road, Hillcrest and surrounding area.

It is used by the community both young and old for recreational activities such as dog walking, kite flying, picnics and a general meeting place.

With this proposed planning extension we will lose a valuable part of our community space, not to mention the open views.

And what we have come to call our local Village Green.

The proposed 30 houses will create more traffic, which will lead to much more parked vehicles.

This will surely hinder passing traffic to Witton Park & the Crematorium on an already too busy Tower Road, not to mention the already congested Hillcrest.

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## Objection Mr C Coram, 5 Hillcrest Road, Blackburn

REF: 10/17/1378 - Land at Tower Road, Blackburn

For the attention of

Gavin Prescott, Planning Manager

With regard to the above planning application I want to make the following comments against the proposed housing development.

1. The public open space (green field) has been used continuously by local residents for many years (over 60 years) for access to and from Witton Park and should be deemed as a public right of way and public usage.

Local residents and their children have and still use this land for recreation purposes i.e. playing area, picnics and games as well as a thoroughfare, dog walking and exercise.

A small enhanced quality of open space does not mitigate the loss of this still much used green field.

2. Parking is currently a major issue in this area especially Hillcrest Road and Geddes St.

You have correctly stated that residents and visitors park on both sides of the street but have incorrectly indicated that there is greater off street parking than there actually is.

Most of the semi-detached houses have shared driveways and the property deeds state that parking is not allowed on these shared drives. Also, the row of garages do not all belong to Hillcrest road residents, most belong to residents of Preston Old Road. Since parking restrictions were introduced a couple of years ago on Preston Old Road and adjacent streets many of these residents park on Hillcrest Road to the point that we cannot park ourselves. This is a constant problem that a mere 15 possible extra spaces on the development would not cure. Current parking on both sides of the road have to 'climb onto the footpath' to allow access for wider service and emergency vehicles, still remains single vehicle access and restricting footpath access.

Ample space for parking on Tower Road, as your design plan states, would be restricted by the new access bellmouth and still would not accommodate extra parking requirements.

Extra traffic created would also increase the danger to children (and adults)

This parking and access problem is compounded dramatically when events are hosted on Witton Park with increase in volume and parking restrictions imposed by the police.

3. The problematic site of the redundant Homes for Older Persons was created by the council by shutting down this home when homes of this type should have been maintained and increased due to rising older population numbers and is now becoming a major problem nationwide as government and political parties broadcast.

I would not be opposed to this area of the site being developed for self sufficient homes for the elderly (similar to the nearby Hunters Lodge development) a far greater community benefit, than residential dwellings being proposed.

4. Local schools will inevitably suffer due to any increase in population in this area bearing in mind that circa 600 new homes are being built just over a mile away from this location (Gibb Lane / Livesey Branch Road). The Witton Park Academy school is new in name only, as was built in lieu of a demolished school.

In the overall plan an increase of 30 homes is a very small percentage of the boroughs overall plan (circa 400 No/year) of providing new homes in relation to the loss of this well used open space.

I expect these valid observations to be considered and taken into account in determining this application.

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### Objection Mr Newton, 34 Tower Road, Blackburn

To whom it may concern,

I would like to register my objection and oppose the development of Feniscliffe Bank & Tower Road site.

As per the outline planning application pdf's on line from your web link from the letter dated 14th November 2017 Clearly the site plan has been redrawn to encompass green belt land, parkland & public land.

Going forward I would like to be consulted before design principles are in place.

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### Objection Mr R.J. Mercer, 21 Hillcrest Road, Blackburn

With regards to the above Outline Planning Application I wish to make the following comments, questions and Objection to the application

1. I understand that from a previous solicitors search; that the "green field" part of the (field) was left in trust by the Fielden Estates to be retained as open space to be enjoyed by the residents of Feniscliffe and surrounding areas. Is this not the case?
2. As this is an Outline Application only; it does not indicate what type of dwellings are to be built, one? two? three? bedrooms. Heights? spacing? etc.

- Access and road layout within the site? Parking for new dwellings?  
Plus extra parking for loss of existing parking to allow access?
3. I agree that demolition of the Aged Persons Hostel should go ahead as this is becoming vandalized and an eyesore to the area. But may I suggest that rather than build large dwellings, that retirement type properties i.e. one and two bedroomed bungalows replace the Hostel.

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### Objection Stuart Shaw, 9 Hillcrest Road, Blackburn

I refer to your letter dated November 14th 2017 and the submission details provided online at [www.blackburn.gov.uk/planning](http://www.blackburn.gov.uk/planning) associated with the application referenced.

As homeowner and resident in the area and directly affected by the proposed development I wish to object to the development, and believe the planning proposal should be rejected due to its significant detrimental impact on several aspects of the area.

The area on which the development is planned is currently a predominantly open, grassed area adjacent to the former Feniscleffe Bank 'older persons home'. This open, grassed area provides a centrepiece for the local community with all age groups finding use and purpose for the area, from youngsters learning to ride bicycles for the first time to older members of the community taking time to use the benches provided to enjoy the view over towards Pleasington Priory and the wider vista out towards Houghton Tower.

The area is widely used by many people on a daily basis and is an important feature which establishes an identity for the locality and is often to be found referenced as a landmark. Indeed, it is a key attribute for all the existing dwellings - the outlook and sense of position created by the open space to the West defines the character of the area and all the dwellings within it, within the Hillcrest Road/Tower Road intersection.

Further, the landscape on the route from the main road of Preston Old Road, onto Tower Road and down through the Witton Country Park gates provides an important transition from 'townscape' to 'countryside' as you progress down Tower Road. This transition will be lost in the event of any development in the currently-open area and this will also impact on those people involved in the regular traffic to the Pleasington Crematorium. The ability of the open, grassed area to provide a contrast must be recognised and this contrast enables many further aspects such as enabling a biodiversity corridor across the area and improving the relationship between the existing dwelling area and the wildlife in the Witton Country Park with a softer, more gradual transition rather than any 'hard edge' demarcation.

I am sure the Council and the Planning Department will all be well aware of the already congested nature of the roads in the area, not from traffic but from parking. The restriction in parking on the Preston Old Road area immediately behind Hillcrest Road means that all the houses on Preston Old Road who do not, can not, or prefer not, to park in front of their own houses, instead have to use on-street parking on Hillcrest Road, resulting in full occupancy of all on-street parking during parking restriction periods on the main road and parking spilling over to Tower Road. More dwellings in this area would only serve to increase traffic and potentially also exacerbate parking conditions further.

In conclusion I would urge the following key points to be considered with the application and that the application thus to be rejected;

1. The application significantly undermines the local public views and negatively impacts the open area immediately next to the high quality landscape and area of environmental interest within Witton Country Park. This is non-compliant with the Council's own stated policy BW1 which states that 'The development should not undermine local or strategic views and vistas' and, from elsewhere, that the Council should seek the 'protection of important public views'. Reference; Blackburn with Darwen Design Guide Supplementary Planning Document.

2. Any development on the existing open, grassed area will remove a key feature that defines the locality and community in the vicinity. The contrast and diversity provided by the area is a key means by which the requirements to apply good urban design are met and to remove this feature would, by definition, be non-compliant with established good urban design.

3. The nature of the space in which the development is proposed is such that it creates the immediate skyline both from the East looking West and also when looking up from Witton Country Park, from West to East. The proposal is, in essence, building 'on' the edge of the 'bowl' of Blackburn, rather than 'in' the bowl and would negatively impact the ridge line in the area. This aspect again contradicts Blackburn with Darwen Council's own stated approach in this area.

Given the potential for some activity, applicable to the former 'Feniscliffe Bank' building, and the possible impact or involvement of the adjacent land area, I request that I be consulted before design principles are in place.

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## Objection Mrs Karen Coram

I am writing to you as a local resident to voice my objection and concern regarding the redevelopment of land on Tower Road, Blackburn.

Although I am not opposed to the redevelopment of the site of Feniscliffe Bank I do have both objections and concerns about the green area adjacent to the aforementioned site . I have been a resident of the area for 47 years, being born and raised along with my 7 siblings on the corner of Preston Old Road and Geddes Street, later to purchase my own property at the northern end of Hillcrest Road.

I have fond childhood memories of the green area which we referred to as 'The Table Top' due to the flat aspect of the land . I along with my siblings and most of the children in the area not just on Hillcrest Rd but also Preston Old road and surrounding areas spent much of our childhood playing on there, taking our first independant rides on our bikes, the boys beginning their grass roots football experiences having a kick about in the knowledge that they would not be told off for bouncing a ball in the street.

I have raised my own children at this address and they have used the green for identical purposes as do children who are currently growing up on the street along with residents who regularly walk their dogs in the area.

Not only do the young people of the area benefit from the open space at their fingers tips but many an elderly resident of which there are a number of who have resided on the street for many years stroll to the benches and sit watching the world go by. One such local resident who passed away just a few years ago walked every day across the green as far as the gates then back to sit on the bench and each day inevitably someone would pass her by and say 'hello Mrs Ingham' and sit and chat with her, this lady lived well into her nineties and often this was the only human contact she would have in a day . My own father who remained in the family home on the corner of Geddes St until his passing earlier this year did the same thing, walking on the field then sitting on the bench to admire the neighbourhood he had lived in for over 50 years.



As I say I am not opposed to the redevelopment of the Feniscliffe Bank site but feel the plot should be designated to provide accommodation for the elderly similar to that provided at Hunters Lodge on Preston Old Road rather than large family homes which there is a need for in this area as there is very little provision for the elderly to downsize their homes in this parish.

It is also felt that the proposed figure of houses for this site will be an insignificant number to the council target of homes to be built within the borough and we request that we are consulted prior to the design principles being in place.

If the properties were to be large family homes this would increase the number of cars and volume of traffic which will add to what is already a problem in the area as there are currently no off road parking facilities for residents.

May i recap my objections as this:

Loss of an important community greenfield amenity.

Loss of a public right of way that has been used by residents for many years.

Parking and access issues for residents and emergency services.

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### Objection Mrs Goodall, 40 Hillcrest Road, Blackburn

I write regarding the outline planning application 10/17/1378, land at Tower Rd, BB2 5LE.

I take note that the proposed site not only encompasses the footprint of the Old Feniscliffe Bank, sheltered accommodation – but also land to the North and West.

Originally as I remember it, this land in 1930/1940's was public allotments – a purpose solely for community use. It then fell into disuse and as public open space was well used by the local children as a play area. Eventually when Feniscliffe bank was built in the 1960's? You could still say, that loosely - the purpose of this site was for the benefit of the wider community of Blackburn w Darwen.

As the precedent has been set for a building on the site of Feniscliffe Bank I would not have objections for its use for house building. I would however be monitoring access to the site as there are already traffic problems on Hillcrest Rd due to its proximity to Tower Rd, which is a gateway to the Crematorium and to many large public gatherings in Pleasington Fields and Witton Park, back entrance.

I do however have serious objections to building on the green open space and public amenity space outside the footprint of the Feniscliffe Bank site, but within the development proposals of planning application 10/17/1378..

May I at this point ask a specific question? How did the council originally acquire this land and at that time were any conditions placed on this acquisition - regarding future use of same?

The other considerations regarding my objections to the building on the green open space and public amenity space are as follows:-

- The land is very much used as public open space by the local community and also the wider community when the gates to Pleasington Fields are opened late on Tower Rd.

- For mourners travelling to the cemetery in times of great distress - this gentle green vista presented to them on turning into Tower Rd is of much benefit. One questions the impact on people's well being.
  - Again, to build on this area completely alters the approach to what is one of the finest open space areas in Blackburn w Darwen and beyond. As such it will have an effect not only on the local community but also on all those who enjoy this area for recreational purpose - an unacceptable impact on landscape character.
  - The value of Pleasington Fields as recreational space is that whilst 'there', it feels like you are much further from the town than is actually the case. To then place any building on the site line from the fields back up towards the Tower Rd area would be to destroy the illusion, and be very detrimental. A total destruction of people's sense of place.
  - As I wrote above, Tower Rd suffers from severe congestion at the time of large funerals or large public occasions. Traffic backs up as people wait to turn into Preston Old Rd, many times in great numbers. Vehicles then use Hillcrest Rd as 'rat run' to enter Preston Old Rd via Geddes St. Parking on Hillcrest Rd is already full, on both sides of the street, even during the day - with clients to the businesses on Preston Old Rd. At night time, again, there are no parking spaces on Hillcrest Rd as all are taken up by residents.
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## Objection Paul Preston

Comments with regards to planned redevelopment of Feniscliffe Bank Home REF 10/17/1378

Dear Nick Blackledge and Ian Richardson

My Name is Paul Preston I have lived at 20 Tower Road Blackburn opposite the Feniscliffe Bank Home for nearly 7 years. In this time I have watched the closure, the manned security and boarding up of Feniscliffe Bank Home. In the buildings current state yes it is an eye sore and something should be done with it, I do not however agree with including most of the open field surrounding the home in the proposed redevelopment.

I as a parent and a dog owner use this field as a safe recreational area to walk the dogs, play football, cricket, and badminton and see the open field as a safe place for the children of the area to play together within sight of most bedroom windows around the field.

I personally would like to see the council and local planning office consult with local residents on what to do with the site if this is a high priority on Blackburn with Darwen Bough Councils redevelopment list. Having a consultation period or meeting with the local community I believe will yield the best return for Blackburn with Darwen council, local residents and mean the area is still seen as a place where people want to move to, to bring up a family, retire or downsize and is not just seen as another estate like all the others that seem to be being built at the moment. Quality homes intern returns quality residents.

If the redevelopment of Feniscliffe Bank Home goes ahead I think the development should be built as though a village green is the centre main attraction for all residents of the area to be proud of. Off street parking should be allocated 2 cars to every property, additional parking for residents of Hillcrest road should be provided as this road is already heavily over parked, that's before any events such as the circus, fair or bonfire night are held down at Witton Park.

This would also keep the approach to the cemetery open & free from congestion so funerals and people wishing to pay their respects to lost love ones still feel the peace and tranquillity of the drive or walk up to the cemetery from the entrance of tower road rather than the gate to the cemetery.

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## Objection Reg & Jean Smith, 32 Tower Road, Blackburn

### Planning Proposal Feniscliffe Bank/Tower Road.

I write with reference to the proposed planning application for Feniscliffe Bank/Tower Road.

We have resided in the area for 35 years and we attended a meeting at St Francis Church Hall of Friday evening, 1<sup>st</sup> December along with a good number of the residents affected by these proposals.

I would like you to take in to consideration the following points before finalizing any proposals.

- **Children** -The grassed area on Tower Road is looked upon as a 'Village Green' where children for many years have played in a relatively safe environment. The open space, surrounded on two sides by semi-detached properties, provides unobtrusive but watchful neighbourhood safety which must be paramount in and decision taken.
- **Right of Way** - The 'Green' is used daily by members of the public from the surrounding area, walking and recreation attracted the magnificent view across the country park as far as Pleasington Priory.
- **Parking** - Increasing in recent years, car parking space has become a serious and dangerous issue. In addition to residents of Hillcrest Road having very little off-road parking space and other parking due to the restricted parking on Preston Old Road.
- **Traffic** - Traffic has also become an issue as more and more people enjoy the amenities of the country park, which in itself promotes a healthy lifestyle for the people of Blackburn but makes Tower Road a much busier road than it was ever intended to be.
- **Funerals** – Funerals pass at least 8 times a day during the week and have to keep to a strict timetable to avoid a backlog. This is an important point as these occasions are very sad occasions and first and foremost must run smoothly and on time.
- **Enhancement** -Tower Road is the approach to the Country Park and the cemetery, with the attractiveness of the village green complimenting and a good advertisement, not only Witton Park but the town of Blackburn itself.
- **Future Generations** – Leave the village green along for the children of tomorrow.

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## Objection Shelagh Ellison, 1 Hillcrest Road, Blackburn

I refer to the above outline planning application and I strongly object to the plan in its present form on the grounds that there is going to be such a great loss of green open space. I have lived on Hillcrest Road for 40 years and generations of children have played on this open space. They play football, cricket, rounders and other fun activities which keep them fit. I know they could play in the park, but it is not safe for them to play there on their own, whereas they can play unsupervised on the green open space with parents and neighbours watching them from their houses. Children playing together on the green form friendships which is wonderful to see. It will be a very sad day if this green open space which according to the outline plan is to be greatly reduced, will no longer be available for the children of today and future generations.

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## Objection Steven M Talbot, 23 Hillcrest Road, Blackburn

### **Ref Planning Application Reference 10/17/1378**

I am writing to you in respect to the outline planning application on land at Tower Road Blackburn BB2 5LE submission, of which I received a notification letter dated 14<sup>th</sup> November 2017.

As a resident on Hillcrest Road, of which my frontage overlooks the said site for the proposed development for quote "up to 30 dwellings" on the former site of Feniscliffe Bank home for the elderly. I have several concerns in respect of the impact and validity of such a development on the local area. I believe you need to be resident in an area to understand how it has evolved to its current state within the community. Not only by the mix of housing, open spaces, the history, its people and the impact that change of any nature would have on this fine balance.

I hope you will consider these as being constructive and act to embody the suggested remedies to alleviate and minimise the problems such a proposed development would create.

1. As I understand it the currently undeveloped area bounded by Tower Road and Hillcrest Road is considered to be Greenbelt area and a housing development is contradictory to the use of greenbelt within the boroughs boundaries. This area during the lighter months of the year is used by residents as a local amenity area for playing and meeting / conversing / socialising with neighbours and friends. This facility would be lost with the density of the development proposed.
2. Local Residents on Hillcrest Road have major issues with on street parking; this situation is exacerbated with the residents on Preston Old Road having parking restrictions outside of their properties and parking on Hillcrest Road. The parking is also made worse when events are taking place within Witton Park. (In fact some local businesses encourage their clients / customers to use Geddes Street and / or Hillcrest Road to the park whilst attending their premises, this can extend into the early evening when parking is at its most demanding time)

Permits? The residents and businesses on Preston Old Road could also benefit from lifting the parking restrictions and providing a half and half parking scenario similar to the system already employed on Preston Old Road between Cartmel Road and Grant Road? This would also assist with resident parking on Hillcrest Road.

If not then consideration could also be given to providing additional parking on Hillcrest Road in the form of drive in parking, this would be on the proposed development side of the road? This would consume a little more of the sites footprint but provide a significant amount of additional parking for the local residents. I can only think that the parking on Hillcrest Road would also be impacted by the potential of up to 30 additional homes with the increase in vehicles by the new residents and their visitors etc...

I would encourage the Planning committee to make a visit to Hillcrest Road at the peak times of an evening, to view first-hand, the impact on limited parking has on the residents of Hillcrest Road.

3. If the development provides an additional 30 homes on the site then the increase in traffic could be significant as most households these days have a minimum of 2 vehicles this would increase traffic movement by 60 (120 in & out) times daily. This is without taking in to consideration the visitors to the new developments. Hillcrest Road is quite often seen as a convenient "cut through" by people queuing to exit onto Preston Old Road from Tower Road at peak times, i.e. Funerals and Sporting events etc... On occasions some of the traffic using Hillcrest Road often exceeds the speed limit and have little consideration for the width of the street, due to parking on both sides restricting it to virtually a single track and oblivious that people may just be stepping out to access their vehicles etc... Increased traffic using Hillcrest Road to access the proposed development will add to the danger of the parking / road narrowing effect on the current resident's safety.
4. Could the development also be prioritised to providing affordable housing in respect of enabling young or indeed elderly already local residents to be able to migrate to new, more cost effective, better insulated, lower maintenance, and warmer homes to either start out home ownership or be more comfortable in their latter years. If the property / developments are at a value of more than the average value of the existing properties, I would suggest that this will have an adverse effect on the current properties future values. In my opinion the land which is currently occupied by the closed / unused former Feniscliffe Bank home would be best served in providing housing for elderly people in a safe and protected environment so as to closely link to its previous purpose. There is scantily enough provision for people who have during their lifetimes built the communities that we know and enjoy today.
5. Also with the start of construction of what eventually will provide 700 new homes within 0.75 miles from the proposed development on Hillcrest Road / Tower Road is the requirement to squeeze in 30 homes on this open land really imperative. I would question whether the benefit of up to 30 homes in

this case, outweighs the maintaining of a long standing open, community green space. It is important that the existing, long standing environment does not suffer irreparable damage.

6. Whilst it is important to maintain the environmental protection of the bats of which this is / has become their natural place of habitation that the construction does not compromise / jeopardise their future existence in this location. This is to allow future generations to enjoy their twilight evening habits of the bats feeding on the wing. Dense housing on this site would I believe cause the natural habitation of these creatures to suffer detrimentally. Also in respect of nature's other residents on this site, this needs to be studied and documented as their protection is also to be considered as a paramount importance. I personally have witnessed deer at the perimeter fence / boundary with Witton Park, rabbits, hedgehogs, moles and various species of birds and butterflies. I would also suggest that even frogs and newts may have some presence, due to the damp nature of the environment.
7. There will also be added pollution in the locality and there may well be an element of disruption to grieving families and friends attending the funerals / cremations of loved ones at Pleasington Cemetery, as Tower Road will invariably see more vehicular traffic.

8. With additional housing there will inevitable be more interest from the unscrupulous elements of our society and crime and vulnerably of what is currently a local population in the higher end of the demographic scale, may well isolate people from enjoying a relatively safe environment which is currently.

9. If the proposed development does go ahead the disruption in terms of heavy construction traffic, road conditions (mud and debris etc...) noise, parking for construction workers, security in respect of added threat to existing properties, pedestrian and traffic safety all need careful consideration. Stringent control of working hours and limited weekend with at least the Sunday, if not Saturday also, being a totally closed site environment to allow the residents a respite from the above. Any construction workings should have no impact whatsoever on the already limited parking situation.

I also reserve the right to be consulted before the design principles for the development are in place to understand and to be able to influence the final outcome of the said proposed development.

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### Objection Gerald & Susan Scholes, 28 Tower Road, Blackburn

Dear Mr Ian Richardson,

As local residents for over 20 years, we would like to register our concerns to the development of both Feriscliffe Bank and Greenbelt land adjacent to our property on Tower Rd. We are aware an outline planning application has been put forward by Capita for a residential development for up to 30 dwellings. We would like to register our opposition at this stage of the initial

proposal.

Our concerns are of the loss of our community green, where for years local residents have used <sup>this amenity</sup> to walk their dogs, for children to play football and cricket, and exercise on a safe area where their parents can see them. Also the impact on traffic and parking which will have a major impact.

So as local residents we would like to have some influence over how the land is developed and to be consulted before design principles are in place. We would like to suggest that adequate and sufficient green space and provisions for parking are considered to compensate for the community loss also we would like to suggest fewer dwellings and

More landscaping in keeping with the open feeling of the area.

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## Objection Ian & Lynda Tipping, 19 Hillcrest Road, Blackburn

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Re the proposed building work to be carried out at the existing Feniscliffe Bank site and the village green adjacent, and how it will affect both Hillcrest and Tower Road.

**1. Direct resident impact;**

as a family who has lived at 19 Hillcrest Road for the past 24yrs, we use the village green on a daily basis for both walking and running (to keep ourselves fit and healthy to decrease our reliance on the overstretched NHS)

We have and intend to use our village green for picnics and family celebrations, ie; birthdays, anniversary celebrations etc We have witnessed and been invited to many social events that have had the green as it's focal point.

**2. Negative impact on residents children;**

our 3 girls played on the village green all through their childhood and beyond, we consider the green to be a safe play area as it is away from the road but in sight of the houses, perfect! If the village green is taken from us, children would lose this safe playing environment. In a government study it was found that green infrastructure such as our village green aids development and learning also it has a massive affect on the mental well-being of local residents.

**3. Loss of open space;**

the governments own initiative to protect and keep safe this type of village green for the reasons stated above looks to have been completely ignored.

**4. Residential parking;**

in the proposal the issue of residential parking is covered all to briefly with a note about garages being available at the top end of Hillcrest rd (behind Gedis st) There are 14 garages all of which are in use and will not make any difference to even to the current parking situation.

Over a 7 day period (27/11/2017--- 4/12/2017) I carried out a physical vehicle count in the evenings on Hillcrest Road, the average was 58 vehicles. A proposal must be outlined by the planning/highways committees to include parking for all Hillcrest and Tower road residents.

The parking restrictions on Preston old road also adds to excessive vehicles parked on Hillcrest road.

Parking during the day time (weekdays) is not an issue, it is evenings and weekends when the number of vehicles is high.(please do not do a vehicle count/assessment on a week day morning/ afternoon as this would not representative of the true number of vehicles parking on Hillcrest road daily) Without new major parking facilities put in place I cannot see how the proposed added number of houses are physically going to manage. This, as I'm sure you are aware would lead to disharmony within our happy community.

**5. Access to playing fields, crematorium and residential properties;**

Tower road is the only access road to Pleasington playing fields, the crematorium and resident access. The proposal would cause a significant increase in traffic causing backup onto Preston old road resulting in an added danger to all road users.

**6. Maintenance of our village green;**

to help Blackburn and Darwen council with their financial difficulties the residents committee would be willing to take on the upkeep of their own village green, mowing the grass and general maintenance.

The green is well maintained and the grass and land is of a good quality, this is how we mean to keep it.

**7. Development of the existing site;**

we would like to see a development of properties (on the Feniscliffe bank site) suitable for pensioners and the infirm ie; bungalows and residential/warden

supervised properties. As you will know there is a lack of properties of this type in the local area, for people who are ready to downsize and thus allowing their houses to become available for younger families.

In conclusion, I'm sure that we are not the only concerned residents and I would like to take this opportunity to say thankyou for taking the time to read and to take our views and concerns into account when you have meetings about the development Ref: 10/17/1378. To yourselves it may be just a reference number and a cash figure on the bottom line but it is far more than that to all the residents on who which if this proposal went ahead it could and would ( to some ) have a devastating affect. Sometimes it has to be about the impact that your decisions will have on actual people and not just on how many boxes can be ticked and how much money can be made.

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Objection David Stevenson, 44 Tower Road, Blackburn

I would like to comment on this proposed development -

The land is green belt & is used daily by residents of this area for recreational purposes.

The land is covered by a Trust which should prevent such a development.

The very busy access to Pleasington crematorium & Wilton Park - the regular stream of traffic to the cemetery & especially

by Asian residents of Blackburn. Ed celebrations also entail a tremendous stream of traffic by residents visiting the cemetery.

The park & playing fields host many sporting activities - football, cricket running also a monthly meeting on Sunday morning of horse associations - a very busy day.

We are delighted that the building that was an old people's home is to be demolished & hope that any building will be done in a sensitive way giving due respect to the problems mentioned & the local people who enjoy the facilities provided by this lovely area

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## Objection Bethan Martin, 37 Hillcrest Road, Blackburn

Dear Nick

I am writing in regards to the planning permission for the land off Tower View and Hillcrest Road and proposals from BwD Borough Council to build housing on this piece of land. I also understand that Fenisclyffe Bank will be demolished to accommodate these homes although it was my understanding that the home was supposed to be replaced with a like for like service.

The borough has already closed its homes for older people and lacks quality provision for older people so I'm shocked that the council has decided to build houses rather than an older person's provision.

There are already too many empty houses and I think it would be highly unlikely that the houses being built on this land would be "affordable"

The land you propose to build in is used daily by all the local residents, children use this area to play safely away from the road and older residents that can't manage to get down to the park with their dogs, exercise them on this piece of land. We would be losing open space and a safe place for our children to play in a town that already lacks in providing resources for younger people to socialise safely.

I am aware that we live next to a park and you may suggest that children play there. with cars in excess of 50 miles per hour up and down the road into the park I would not feel safe allowing my children to venture down alone as well as there being unsavoury characters hanging around the park in their cars it is not safe for children to go to the park alone therefore we will be taking their independence away

There is also wildlife that habitat in this land such as hedgehogs (massively declining in numbers) and swifts.

We already struggle for parking spaces as residents from Preston Old Road park on Hillcrest Road so 15 spaces won't help

I really think this is just money making scheme and not one thought has been placed on local communities or the environment.

I propose that we be allowed to keep this area for a village Green – I feel enough of us object to this plan so we could maintain it and apply for grants ourselves in order to keep the open space for the community

I think residents would appreciate being consulted with rather than informed going forward in order that we can reach an amicable agreement.

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## Objection Mr & Mrs Heather

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Dear Sirs

I refer to the planning application on Hillcrest Road for up to 30 dwellings to which I have major concerns detailed below and would like to register our objections to this development.

As residents of Hillcrest Road there are already severe issues with parking due to restrictions in place on Preston Old Road leading to people just leaving cars anywhere they can and residents on many occasions cannot park near their property. The road is used as a rat run through from Geddes Street to Tower Road and can be hazardous to say the least and with proposed additional properties this will only escalate the issue. Do you have plans in place to offer guaranteed resident only parking??? Access cannot be via Hillcrest road as this is clearly not viable the road cannot cope with this.

A major concern is the proposed loss of the recreational village green that is a big part of our life we walk our dog here daily have children that have used this for sports or to sit do homework and enjoy the green space that is a major part of the community this would be a clear loss of amenities.

The proposed building structure and heights have not been detailed we believe this should be less properties on a smaller scale the area has a clear lack of retirement properties bungalows in particular that should be taken into consideration.

We await further communication on this as soon as possible.

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## Objection Mr & Mrs Keen, 11 Hillcrest Road, Blackburn

We would like to raise an objection to the proposed outline planning application 10/17/1378 and make suggestions as to how the space could be developed. The reasons for the objection are as follows:

- Loss of community space
  - the green infrastructure land at Tower Road is used, and has always been used, as a Village Green. It is used daily by dog walkers, walkers, and children to play. It provides a safe place for residents of Tower Road, Hillcrest Road, and wider (Preston Old Road and St Francis Street area) to walk locally, enjoying the space and views, whilst in close proximity to other residents making this a safe space to enjoy. It is used by older people in the area allowing them to undertake physical activity without the challenge of walking too far away from their homes
- Loss of safe spaces for children
  - We have two young children and the key driver in purchasing our property was due to the open green space available outside our home. The properties on Hillcrest Road are back-to-back in nature and have very modest gardens. The green infrastructure land enables children to play independently and safely. The space is regularly used for football, ballgames, nature adventures, social gatherings, picnics, exercise, and explorations. It promotes community interactions with children meeting and socialising, thus bringing families closer together. In an era of increased social isolation for young people, and an increase in online interactions and all the related subsequent mental health issues, it is vital to maintain this community space.

- Impact on traffic-parking and traffic flow
  - The current parking on Hillcrest Road is at capacity during evenings and weekends. It serves both Hillcrest Road residents and those from Preston Old Road due to parking restrictions there. I personally work late evenings and have frequently had to park some distance away from my home, walking back in the dark. Further increases in traffic will exacerbate the issues.
  - During events held at Witton Park and Pleasington, parking issues are intensified as it is used for event parking. The traffic during events also increases the volume of traffic in the area, where drivers often drive in excess of the speed limit to exit events. This is an increased concern for those of us with young children. Again, added developments to the area will exacerbate these issues.
- Increasing social isolation
  - Tower Road green infrastructure provides a space for all local residents to meet. The loss of this space will drive people further into social isolation

We would like to see a development that considers the aforementioned points. A development could, for example, include:

- - A reduction in the number of units proposed. A move from 30 to a more reasonable 15
  - A development that is constructed on the footprint of the existing Fenscliffe Bank site, providing good quality housing for new residents whilst protecting the green infrastructure land for new and existing residents to enjoy together
  - A development that supports local elderly residents wishing to downsize and remain in the area (Policy 18 Housing Mix, point 3). Preferably smaller units/bungalows thus further protecting the existing local green infrastructure
  - A development that attracts working professionals and young families, complementing the existing properties in the area
  - Appropriate provision for parking and traffic management

This land has been used recreationally for over 40 years. Policy 40 of The Local Plan; Part 2 states that there should be:

- 'retention and enhancement of existing ecological and landscape features on the site'. A development on the exiting Fenscliffe Bank site will protect the landscape features towards Pleasington Priory, and beyond as well as protecting local existing wildlife in the area.
- 'inclusion of multifunctional landscaped public open space in the development'. The outline planning does not leave a significant public space as there is a proposed access road through the centre of the green infrastructure and the proposed landscaped area is not significantly greater than the existing public footpath.

According to The Local Plan *Landscape 7.13* one of the key factors in attracting new residents to Blackburn with Darwen is '*...the dramatic landscape setting*' and '*The visibility of open upland countryside from many parts of the urban area helps convey a sense of place, and is a factor in the attractiveness of Blackburn with Darwen as a place to live and invest*'. As a relatively new resident to Blackburn with Darwen, the open space in the urban area was a key factor in our decision to purchase and invest in Blackburn and move from Preston, something which your proposed development will eradicate. Why choose Fenscliffe when you could purchase in Hoghton?

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## Objection Rory Needham

Dear Mr Prescott,

The Livesey Parish Council would like to object to the above scheme and cite the following reasons for the objection:

- ✓ The view that the space is currently used as a community Village Green and that the space should be further developed to enhance this facility
- ✓ Loss of open space.
- ✓ Parking Issues.
- ✓ Loss of community space which is an important factor for local residents.
- ✓ Impact on access to Pleasington-both aesthetically and traffic flow / management within the area.
- ✓ If the area was to be developed would a retirement development be more suitable as there are a shortage of retirement developments in the area.
- ✓ There is a saturation of housing developments locally at Gib Lane, Heys Lane Eclipse Park and the Sappi Site.

Can you please bring this objection by Livesey Parish Council to the attention of the Planning Committee.

## Objection - Bernadette Boast, 6 Geddes Street (via Councillor Keith Murray) 30<sup>th</sup> January 2018

I have been asked to contact you by a resident of 6 Geddes Street – Bernadette Boast, to express her concern and objection to the proposed redevelopment of the public open space for housing. She has asked me to point out that they have a gate access at their boundary onto the public open space. This gate has been in use for at least 20 years and regularly used by her handicapped son to access the open space, the gate is not shown or mentioned on any of the documents lodged with the planning application. Will you please note the above and include this e-mail as a formal objection to the planning application.