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Patron  
Her Majesty the Queen  
President  
Emma Bridgewater  
Chair  
Debra McConnell

By email: [planning@pendle.gov.uk](mailto:planning@pendle.gov.uk)

15 May 2020

Dear Alex

**20/0259/FUL: Full: Conversion of Barn into 2 No. Holiday Lets and the Siting of 5 No. Holiday Cabins (Re-Submission).  
Stone Fold Farm, Stump Hall Road, Higham, Burnley, Lancashire, BB12 9BT.**

I am writing to you on behalf of CPRE Lancashire, Liverpool and Greater Manchester to object to the abovementioned application.

CPRE, the countryside charity, wants a thriving, beautiful countryside for everyone. We're working for a countryside that's rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency. With a local CPRE group in every county, we're advocating nationwide for the kind of countryside we all aspire to: one with sustainable, healthy communities and available to more people than ever, including those who haven't benefited before. We stand for a countryside that enriches all of our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate.

I have considered the application and supporting information. CPRE does broadly support farm diversification, acknowledging the need to support the rural tourism economy, so we are not opposed to the principle. However I find a negative planning balance resulting from a number of adverse impacts, chiefly landscape and visual amenity impacts that are protected by the Area of Outstanding Natural Beauty designation. I recommend refusal of the application in order to protect the rural landscape character, which is recognised by the protection it has in law. See further details below.

1. The proposed development is located within the Forest Of Bowland Area Of Outstanding Natural Beauty (AONB), which is a landscape designation arising from its status of national significance. The development would harm the rural landscape character due to the landscape and visual amenity impacts, contrary to the AONB designation. The application is for development in land within open countryside which is policy protected. Having considered the details, I am concerned the proposed development would give rise to harm to the

openness of the countryside. Core Strategy 2011-2030 was adopted in December 2015. 75 Policy ENV 1 Protecting and Enhancing Our Natural and Historic Environments under the landscape heading says “In determining proposals which affect the Forest of Bowland Area of Outstanding Natural Beauty (AONB) great weight will be given to conserving its landscape and scenic beauty. In addition, proposals will be considered on a needs basis, should be in scale with, and have respect for their surroundings, and be in line with the AONB Management Plan objectives. Proposals in the AONB should have regard to the Forest of Bowland AONB SPG, or its replacement.” I am not persuaded that there is a justification for additional holiday lets at this location.

2. Core Strategy 2011-2030 was adopted in December 2015. On page 75, Policy ENV 1 Protecting and Enhancing Our Natural and Historic Environments, B. states:  
“National Sites (SSSI) Development will not be permitted which would be likely to have an adverse effect on a National site either directly or indirectly unless the benefits of the proposal clearly outweigh the impacts. Consideration will be given to the extent and significance of the potential damage to the special interest of the designated site and the broader impact of the national network of SSSIs.”
3. The development would have an adverse impact upon the SSSI Impact Risk Zone. The environmental impacts of the development during construction and operation should be fully considered. There would be a potential disturbance of mammals (including bats), amphibians (newts), birds (possibly protected species including Hen Harriers who are present in the AONB), and insects. Any disturbance would need to be understood, mitigated or compensated.
4. There is no local public transport and the additional 7 holiday lets would generate an increase in traffic beyond the capacity of the local road network. The narrow lanes are used by walkers (including families with children in buggies), horse riders and cyclists, and there are no passing places. The scheme layout provides inadequate car parking spaces, which in turn could lead to dangerous parking on the narrow country lanes.
5. The development would be prominent to the network of Public Rights of Way that cross the land and this would give rise to landscape and visual amenity harm from short range receptors.
6. Tranquillity is an important countryside character. There would be an increase in noise harming tranquillity. Ability to see the night sky and star gaze is another important feature. CPRE is concerned that there could be light pollution spilling from the proposed development. CPRE places value on dark sky areas due to the lack of opportunity to see the stars due to development in remote rural places.
7. There is opposition from the locally elected Higham-with-West Close Booth Parish Council and neighbouring Goldhaw and Booth Parish Council. Local opinion must be given weight when taking a decision.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCERT**

Planning Manager