

Ag 7.

HEDDPD Reg 19 Publication Consultation 2017
Forward Planning, Regeneration and Housing
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

7.6.17

Dear Sirs,

**Representations to Ribble Valley BC Housing and Employment Development
DPD (HED DPD) Reg 19 Publication Consultation 2017 on behalf of The
Trustees of Hammond Ground**

We act on behalf of the Trustees of the Hammond Ground and have been instructed to make representations to these documents. Our clients' can be contacted via ourselves as agent in this matter. Our contact details are as shown at the head of this letter. All correspondence on these representations should be addressed to us at Dickman Associates Ltd, FAO: J Dickman.

Our clients are the owners of Hammond Ground, Whalley Road, Read, which has been previously submitted for consideration to Ribble Valley BC (RVBC) as a SHLAA site for residential development as well as the subject of a planning application.

We have previously made representations to the Reg 18 stage of this process and have now read the latest iteration of the consultation documents and the accompanying background papers and set out representations below on behalf of our clients. Where our concerns and comments to the Reg 18 stage have not been taken into account they are still maintained.

The Arcadis Sustainability Appraisal non-technical summary is dated Jan 2017 yet the full document is dated March 2017. It would appear that the non-technical summary relates to the previous SA. This seems to be an inconsistency in the evidence base is not justified.

A fundamental concern as to the soundness of this Reg 19 document is the accuracy of some of the information in the background documents upon which it is based. It seems the council's own consultants have not properly understood the RVBC adopted Core Strategy in particular the settlement hierarchy it adopts, and thus the land use allocations. Therefore, if the Council are using these documents as the basis of current consultation document that is neither justified and nor sound.

Table 5.1 only identifies Clitheroe and Longridge as the main urban centres whereas in the adopted Core Strategy (RVCS) Whalley is included in the list of main centres.

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They then implausibly suggest a target of 100% of new development be on PDL when that is one thing RVBC area distinctly lacks.

Appendix A makes no mention of the Housing White Paper so it has to be questioned as to how up to date is this background paper. Appendix B reiterates the comment that Citheroe and Longridge are the main settlements and even goes on to note Whalley and Sabden are large villages. Whereas the adopted Core Strategy key statement DS1 includes Whalley as a main settlement and Sabden as a Tier 2 village. The inconsistencies continue so Arcadis have looked at the 65+ age group yet the RVCS uses 55+. Figure B-1 of Appendix B refers to the NE of England whereas Lancashire is in the NW. Maybe a typo like the inclusion of a drive time for 3 airports but only 2 are then mentioned. Table 2 is missing in Appendix B. Arcadis have used the Lancashire Landscape Strategy to assess landscape character but make no reference to the more recent Chris Blandford Study. Such inaccuracies do not inspire confidence.

We are however pleased to note that at Fig B-14 that Read/Simonstone is acknowledged as having good access to a range of facilities e.g. food store, primary school, Post Office, bus stops. Also, that it is noted as being well placed for access to the Time Technology Park.

The pages in all the Appendices are unnumbered but the last page of Appendix B has the following unfinished sentence:

'118 new dwellings permitted completed on previously developed land out of...'

Appendix D continues the trail of errors and Appendix E is not even included.

We are pleased to note in Appendix D that the Arcadis report recommends that our clients' site at Hammond Ground is a committed site and fully support such a commitment. We must point out the site area shown as 20.06ha is incorrect. The correct area is 4.09ha and the number of units is 50.

We were asked by Colin Hirst at RVBC to specifically submit a call for sites form for the site which we did in October 2016 so we are surprised that Arcadis have not taken any account of the information supplied. The correct area is 4.09ha and it lies in the SE corner abutting the settlement boundary. We disagree with the results of the SA topic survey for the site which has considered a totally different and incorrect site area and has paid no heed whatsoever to the information submitted on the call for sites form nor with the planning application that show green infrastructure and biodiversity are maintained and also includes an LVIA. Had the correct site area been used then this would show that the site is not within 300m of a Listed Building nor is it within 100m of an existing water body. It would also have shown that there has already been an FRA assessment and a SuDs solution as well as the proposed extent of the green infrastructure on the very low density scheme. The site is within the Read/Simonstone area which includes the employment sites at Time Technology Park so offering new homes to those in the employment area amongst others.

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At Appendix G there does not seem to be a category for 100% affordable if there are less than 100 units.

Our clients' site is on the western edge of Read (Tier 1 settlement) immediately abutting the settlement boundary. It is in open countryside and has built development to the north and east along its boundaries and also along about two thirds of its southern boundary. It is in a sustainable location. The site is in single ownership and is deliverable, available, accessible and suitable for development. We disagree with the settlement boundary being drawn so tightly in this part of Read and urge that the settlement boundary should be amended.

We concur with the view in the settlement boundary topic paper which confirms that mineral safeguarding areas are not an in principle constraint to development.

The misguided contention of RVBC that 5600 dwellings over the RVCS plan period and 280dpa is maxima is again repeated in the justification of the housing allocations on p7 of the current Reg19 consultation. This is in direct conflict with NPPF which sees housing numbers as minima and which need regular review. The stance in the HEDDPD is misleading and needs to be clarified. Given the national housing shortage then the likelihood is more dwellings will be needed and we reiterate the NPPF notes housing numbers should be minima.

Please confirm receipt of these representations and we ask to be advised of the next stages of the policy consultation.

Yours faithfully



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On 10/10/2001, the following information was received from the [redacted] regarding the [redacted] of [redacted] on [redacted] at [redacted].

The [redacted] was [redacted] by [redacted] and [redacted] on [redacted] at [redacted]. The [redacted] was [redacted] by [redacted] and [redacted] on [redacted] at [redacted]. The [redacted] was [redacted] by [redacted] and [redacted] on [redacted] at [redacted].

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