

Ag 8



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
Huntroyde Estate**

We act for the Trustees of the Huntroyde Estate and have been instructed to make representations on their behalf to these documents. Our clients' address is: c/o Ingham and Yorke, The Huntroyde Estate Office, Padiham, Lancs, BB12 7QX.

Our contact details, as agent in this matter, 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 have a number of land holdings within Ribble Valley BC (RVBC) area, which have been previously submitted for consideration, some are small infill sites of less than 0.4ha and thus excluded from the list below, which comprises their landholdings in excess of 0.4ha:

1. Land NW of Chatburn Road, Clitheroe
2. Land at Vicarage Lane, Wilpshire (Wilpshire1)
3. Land east of Stubbins Lane, Sabden
4. Land at Haugh Head, Simonstone

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 April 2017 Approach to Plan Preparation Document we note that 'reasonable' alternatives will require testing and that the 3 Wilpshire sites originally identified have been sent for such testing. The document then states on p23 'Wilpshire 1 & 2 are not being progressed as the overall preference was for Wilpshire 3'. None of the documents forming this current consultation process have provided any reasoned justification for this statement or decision. Though we note in the summary of representations to Reg18 at para 3.3 it says that Wilpshire 3 got the most support as safeguarded land in the Districtwide Local Plan(DWLP). However, it was never a

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safeguarded site and the DWLP has been superseded by the Core Strategy. We object to the proposed settlement boundary revision HAL2. We also strongly object to this allocation of Wilpshire 3 as not justified, not consistent with national policy and not positively prepared.

We have reviewed the SA site appraisals for Wilpshire 1, our clients site, and Wilpshire 3, the selected site, and Wilpshire 3 has more negative points than Wilpshire 1. Wilpshire 3 is shown as providing 227 units which is a significant increase in housing numbers above the actual 'need' identified by RVBC for Wilpshire, which has a residual requirement of 34 units. Our clients site would provide about 27 units at average density but could include some sections of higher density to achieve the 34 units and it is within the existing settlement boundary in a residential area. It would not give rise to any cross-boundary concerns which Blackburn with Darwen BC has raised in regard to Wilpshire 3. The Infrastructure Delivery Plan notes that Wilpshire 3 has a number of site constraints – steep slopes, within 250m of a landfill site; overhead pylons; and could impact on protected species, habitat connectivity and biodiversity. This choice of Wilpshire 3 is not justified and is not effective.

RVBC again are demonstrating an inconsistent approach to need and allocation of housing land in their borough by choosing to allocate a site that was never safeguarded and which far exceeds the identified need for Wilpshire, yet they have rejected all 4 sites our clients have put forward as they say land is not required in their given respective settlements. That includes a site in Clitheroe which is identified in RVBC Core Strategy Key Statement DS1 as a main settlement where housing development should be focussed.

The Arcadis Sustainability Appraisal non-technical summary is dated Jan 2017 yet the full document is dated March 2017. It seems the non-technical summary relate to the previous SA. There seems to be an inconsistency and 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.

The Arcadis Sustainability Appraisal report (March 2017) at Table 3.2 refers to EU Directives but not if or how Brexit will affect these. 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. 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 how up to date is this background paper. Appendix B reiterates the comment that Clitheroe and Longridge are the main settlements and even goes on to note Whalley and Sabden are large

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villages. Whereas the adopted Core Strategy key statement DS1 includes Whalley as a main settlement and Sabden as a Tier 2 village.

We would add during the CS process the various settlements were assessed to decide on those to be in Tier 1 and Tier 2. It still seems an anomaly that given Sabden when assessed as to existing facilities had more than Barrow that Barrow has Tier 1 status and Sabden Tier 2. To this extent we can understand Arcadis' confusion whether or not they did their SA against the background of the adopted RVCS, even though they should have.

The inconsistencies continue in the SA 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... Possibly Liverpool is the one they forgot? 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. These 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 to the SA 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 in the summary sheet for Whines Lane, Read:

'Site is one of five sites in Balderstone, Read and Simonstone all of which are in close proximity to each other.'

Balderstone is near Salmesbury not Read/Simonstone.

According to Appendix D of the Arcadis SA report March 2017 all our clients' sites are commitments which we would fully support.

Appendix E is not even included.

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

On the matter of our client's sites being commitments according to Arcadis this would be understandable given its location to Read/Simonstone which the Adopted RVBC Core Strategy (CS) identifies as a Tier 1 settlement.

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

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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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