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

8.6.17

Dear Sirs,

**Representations to Ribble Valley BC Housing and Employment Development  
DPD (HED DPD) Reg 19 Publication Consultation 2017 on behalf of The Printed  
Cup Company and the Trustees of Waddington Hospital**

We act for The Printed Cup Company (PCC) and the Trustees of Waddington Hospital (TWH) and have been instructed to make representations jointly in regard to the site known as 'Land at Lincoln Way' (see attached plan) on their behalf to these documents. As we have only recently been appointed these are the first representations on behalf of our clients to the development plan process.

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.

TWH are the freehold owners of the land currently and PCC are looking to relocate from their existing premises on Taylor Street, Clitheroe. PCC have a proven track record as a growing and successful business and employer in RVBC but have outgrown their current location and specifically wish to stay in Clitheroe and to relocate to this site at Lincoln Way. The site is within half a mile from their current premises which is a major consideration to ensure continuity of business and retention of employees. We attach a location plan and a completed Call for Sites form in respect of this land at Lincoln Way, Clitheroe for consideration as an employment allocation in the HEDDPD and a suitable site for development of employment uses.

Several meetings have already been held with Colin Hirst and other key council officers with the view to an application. However, with this timely consultation we are also formally submitting the site for consideration as an employment allocation.

The site extends to 2.47ha and is currently grazing land (open countryside on the RVBC proposals map) immediately abutting the employment area at Lincoln Way which is one of the largest employment zones in RVBC and is additionally well located to Clitheroe the identified main settlement in the Core Strategy policies EC1 and DS1 which say the main settlements and the 2 strategic employment sites should be key focus for employment growth. DS1 also sets out the settlement

**CHARTERED TOWN PLANNER**

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hierarchy for housing development, again Clitheroe is the main settlement. Whilst several housing consents have been granted around Clitheroe over the last few years there has not been the same level of new employment sites and opportunities.

RVBC has an aging population and limited job opportunities thus many residents of working age out commute to Preston, Skipton, Blackburn and other towns along the M65 and as far as Manchester and Lancaster.

By providing employment sites in Clitheroe this will contribute toward stemming the outflow of residents of working age and will provide local job opportunities. PCC are a manufacturing firm but also have strong design and market sales departments so offer a range of job types, have a trainee programme and are very socially and community aware so comply with NPPF para 7 and RVCS key statement DS1 in that this development would be create economic, social and environmental well-being and development for future generations.

At present the HEDDPD is proposing 3 employment sites and identifies a total of 4 ha of employment land being required over the plan period. None of the proposed sites are in Clitheroe, its main settlement. All on located at the fringes of the district. RVCS policy EC1 urges employment development to be in the 3 main settlements or the 2 identified strategic employment areas. Our clients' proposal is for 2.47 ha of employment land with a defined occupier/end user on a site that abuts an existing employment area and the main settlement. It offers a more policy compliant sustainable site within the A59 corridor and close to that road and should be the preferred allocation for employment development instead of EAL1 and EAL3. It could be brought forward by the end of 2018 or sooner subject to consent.

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 non-technical summary is dated Jan 2017 yet the full document is dated March 2017. It appears the non-technical summary relates to the previous SA. There seems to be an inconsistency and the evidence base is not justified.

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

Appendix B reiterates the comment that Clitheroe and Longridge are the main settlements and even goes on to note Whalley and Sabden are large villages.

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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 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. Such inaccuracies do not give any confidence.

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'*

According to Appendix D of the Arcadis SA report March 2017 continues the errors and Appendix E is not even included.

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

Yours faithfully



**Encs:** Call for Sites form and location plan 'land at Lincoln Way'

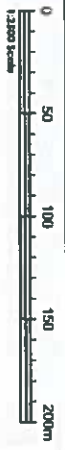
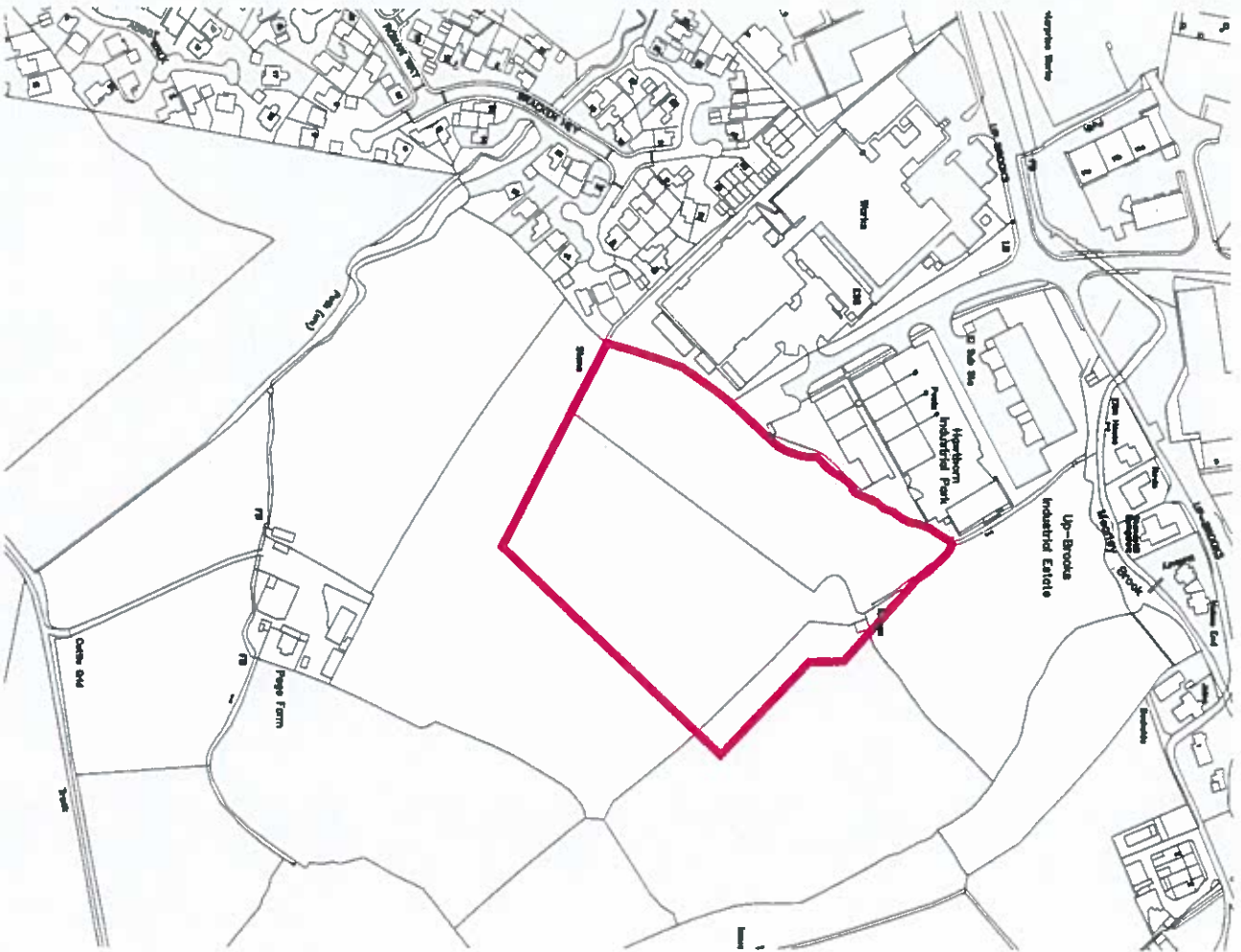
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This plan is to be used in conjunction with all other documents, including any planning conditions, to determine the proposed development. The location of the site is shown on the map. The map is not to be used for any other purpose. The map is not to be used for any other purpose. The map is not to be used for any other purpose.



2. ROAD Boundary determined 21.04.2012		
3. CLIENT Pined Cup Company		
4. PROJECT Proposed Re-location to Land off Lincoln Way Clitheroe		
5. DATE 17.05.00 @ A3	6. SCALE 1:2500	7. DRAWN BY RBM
Drawing title Site Location Plan Site Area 1		
SUNDERLAND PEACOCK ARCHITECTS 11, BRIMLEY AVENUE, SUNDERLAND, TYNE & WEAR, NORTH EAST, ENGLAND, NE1 2JG TEL: 0191 276 1111 FAX: 0191 276 1112 WWW: WWW.SUNDERLANDPEACOCKARCHITECTS.COM		
<b>5348-LP02A</b>		



**RIBBLE VALLEY HOUSING AND ECONOMIC DEVELOPMENT  
REGULATION 18 ISSUES AND OPTIONS  
SUGGESTED SITE FOR CONSIDERATION AUGUST 2016**

RVBC are holding a 'call for sites' for housing, employment and retail land purposes as part of a consultation on the forthcoming Housing and Economic Development DPD.

**This form can be used to submit suggested housing sites, employment land sites and proposed retail sites to the Council.**

If you wish to submit a site as a potential option for allocation as part of this process, please complete this form and provide a location plan which enables the site and its boundaries to be identified clearly. Gaps in providing information could cause delay in assessing your site and its possible inclusion in the Housing and Economic Development DPD site consideration process. If you wish to provide any supplementary information in support of your responses, please append it to this questionnaire.

Please do not submit sites which:

- Already have planning permission or are under construction as these are already accounted for in the plan making process.
- In relation to housing are located in settlements where the residual housing requirement has already been met. The call for housing sites relates only to those settlements where a residual requirement remains. These settlements are:
  - Chatburn
  - Mellor
  - Wilpshire

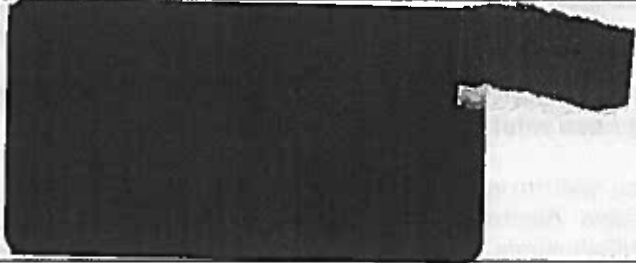
Please use a separate form for each site.

Information provided on this questionnaire will be made public as it will form part of the evidence base to the Local Development Framework. We will not publish personal address and contact information and will hold your information in accord with the requirements of the Data Protection Act. All information provided will be available to the Inspector appointed by the Secretary of State to hold the Examination in Public.

**The suggestion of a site does not imply on the Council's part that it will agree that a site has potential for housing, employment or retail uses; or that planning permission would be forthcoming for housing, employment or retail uses; or that it will be allocated for development in any of the Council's Development Plan Documents.**

Please return this completed form along with a site plan and any further supporting information no later than 5pm Friday 7<sup>th</sup> October 2016 to:

Reg. 18 Issues and Options Call for Sites Consultation  
Regeneration and Housing  
Ribble Valley Borough Council  
Council Offices  
Church Walk  
Clitheroe  
BB7 2RA

<b>GENERAL INFORMATION</b>	
What type of development are you suggesting the site could be developed for? E.g. housing, employment B1 – B8, retail	Employment B1,2 &8
Site suggested by: (main contact if further details required)	
What is your interest in the land?	agent for landowner and end user
Details of site owner: (if different from above)	Name: Trustees of Waddington Hospital & Printed Cup Co Address: c/o agent
Is the owner aware the site has been suggested in this call for sites consultation?	<input checked="" type="checkbox"/> Yes/ <input type="checkbox"/> No
Location of site:	<i>Please write an address and attach a location plan with a clear site boundary which will enable the site to be readily identified:</i>  Land at Lincoln Way, Clitheroe see attached plan with red edged site
Site area (in hectares or sq metres)	2.47ha
Current use of site	grazing land
Is the site greenfield or previously developed?	greenfield



Has planning permission ever been sought for development of the site?	(if yes, please provide details e.g. type and amount of development)  No
<b>OWNERSHIP MATTERS</b>	
Is the site in single or multiple ownership?	Single/multiple  The Trustees currently own the site and the Printed Cup Co are looking to relocate within Clitheroe & develop the land
If multiple, how many owners?	
Have all the owners expressed an intention sell the land for housing, employment or retail use?	
Is the land controlled by a developer who intends to develop the land?	Yes/no. If yes, please provide details  see note above under ownership
Are there any ransom strips, tenancies or operational requirements of landowners which would restrict development?	If yes, please provide details  Negotiations in progress with RVBC to extend Lincoln Way.
<b>VIABILITY MATTERS</b>	
Has the economic viability of the site been assessed? If so, what was the outcome?	Please provide any supporting information  In progress


Please explain why you consider the site to be economically viable (or not).	Development of the site will enable the retention of a growing and successful business within Clitheroe, very close to their existing premises which they have outgrown. Land abuts existing industrial area and settlement boundary.
Are there any abnormal costs/significant constraints that need to be overcome in developing this site?	Please provide details: none currently aware of
How many developers would be involved in developing the site should planning permission be granted?	one
What would be a realistic timescale for developing the site	Start date: 2017 assuming grant of planning consent End date: 2018/19
If this is a large site what would be a realistic projected build rate for the site? (e.g. estimated no. of dwellings per year if for housing or timescale from start to completion of phases of development)	The new premises for Printed Cup Co would be the first phase to complete by 2018 and the rest of the land would be the second phase and would be the following year
<b>CAPACITY AND CONSTRAINT MATTERS</b>	
What is your estimate of the potential capacity of the site? (no. of dwellings/ overall m <sup>2</sup> if employment land / m <sup>2</sup> retail floorspace)	100,000sq ft B1/2/8
Are there any physical constraints which would restrict development of the site?	none aware of
Has any work been undertaken to assess how these constraints might be overcome?	none aware of
Is there direct access to the site from the adjoining road network?	Yes by extending Lincoln Way
Are there any major issues regarding access to the site, and if so briefly what are they?	on going negotiation with RVBC for extending the road

Are there any trees on site protected by Tree Preservation Orders?	a couple but design can accommodate their retention
Are there significant contamination issues/hazardous risks/pollution on the sites?	none aware of
Is the site within an area at risk from flooding (flood Zone 2 or 3 as defined by the Environment Agency)?	No - EA show this site as Zone 1 ie no flood risk
Please explain why you think the site is a suitable location for development.	It immediately abuts Clitheroe's main existing employment area. Highly accessible and sustainable location. The site is shown as open countryside in the adopted Core Strategy. It would be a infill and rounding off of the main settlement in line with RVCS DS1 and provide new B1/2/8 employment uses.
If there are any other issues that you wish to raise in relation to this site, please do so here.	

**Declaration**

I understand that information provided on this form in response to this call for sites for sites, with the exception of name and address, could be made publicly available by Ribble Valley Borough Council in relation to production of the Housing and Economic Development DPD and evidence base for the LDF. Information will be made available to the Inspector for the purposes of the Examination in Public should he or she require it.

The information I have provided is accurate and true to the best of my knowledge.

<b>Name (print)</b>	
<b>Signature</b>	
<b>Organisation</b>	
<b>Date</b>	

