

Ag 11.

PO Box 97
Bolton
Lancs
BL1 9PT

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
Trustees of Waddington Hospital**

We act for the Trustees of Waddington Hospital (TWH) and have been instructed to make representations on their behalf to these documents, regarding their land at Pages Farm. 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 shown edged red on the attached plan (Pages Farm, Clitheroe). They also are freehold owners of the land edged blue ('land at Lincoln Way') and that has also been submitted to this consultation process as a joint representation together with the end user/ occupier. The land edged red is 3.69ha and would need to be accessed through the land edged blue. The sites have been split even though under the same freehold ownership as this site at Pages Farm is consider as a medium-term employment development opportunity (2023-28). We attach a location plan and a completed Call for Sites form in respect of this land at Pages Farm, Clitheroe for consideration as an employment allocation in the HEDDPD and a suitable site for development of employment uses.

The site is currently grazing land (open countryside on the proposals map) immediately abutting the employment area at Salthill Industrial Estate. Access would have to be from an extension to Lincoln Way through the clients' adjacent land (edged blue). Lincoln Way which is one of the largest employment zones in RVBC and is 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 hierarchy for housing development, again Clitheroe is identified as 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.

CHARTERED TOWN PLANNER

Director: J Dickman BSc (Hons) Dip TP MRTPI FRGS FRICS

Company No 6374283, a company registered in England and Wales VAT No 152 2106 58

Registered office: 11 Riverside, The Embankment Business Park, Vale Road, Heaton Mersey, Stockport SK4 3GN

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. Allocating land for employment development in Clitheroe, the main and most sustainable and accessible settlement in RVBC, will contribute to stemming this outflow and provide local job opportunities.

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.

By providing employment sites in Clitheroe this will contribute toward stemming the outflow of residents of working age and providing local job opportunities. Allocating this land and the land at Lincoln Way as separate phases of development land for employment uses would consolidate the existing employment area, provide a 'rounding off' of the settlement in a location that is close to but well screened from the A59 and provide a more policy compliant sustainable location than the locations currently proposed in EAL1 and EAL3. We therefore recommend that our clients land in allocated as employment land for development which would most likely come forward in the medium term (2023-28) which given the RVCS is now 3 years after adoption would in overall CS terms be the mid to late term of the plan.

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 read the RVBC adopted Core Strategy nor understood 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 not justified and not sound.

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.

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

CHARTERED TOWN PLANNER

Director: J Dickman BSc (Hons) DipTP MRTPI FRGS FRICS

Company No 6674283, a company registered in England and Wales VAT No 152 2106 58

Registered office: 11 Riverside The Embankment Business Park, Vale Road, Heaton Mersey, Stockport, SK1 3GN

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. This does not give 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. Location plan and Call for Sites form Pages Farm

CHARTERED TOWN PLANNER

Director: J Dickman BSc (Hons) DipTP MRTPI FRGS FRICS
Company No 6874283, a company registered in England and Wales VAT No 152 2106 58
Registered office: 11 Riverside, The Embankment Business Park, Vale Road, Heaton Morley, Stockport, SK4 3GN

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:
 - o Chatburn
 - o Mellor
 - o 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 7th 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

GENERAL INFORMATION	
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?	landowners' agent
Details of site owner: (if different from above)	Name: Trustees of Waddington Hospital 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 Pages Farm, Clitheroe
Site area (in hectares or sq metres)	3.69ha red edge, (blue edge same owner but separate rep)
Current use of site	grazing land
Is the site greenfield or previously developed?	greenfield

<p>Has planning permission ever been sought for development of the site?</p>	<p>(if yes, please provide details e.g. type and amount of development)</p> <p>No</p>
<p>OWNERSHIP MATTERS</p>	
<p>Is the site in single or multiple ownership?</p>	<p>Single/multiple</p>
<p>If multiple, how many owners?</p>	<p>n/a</p>
<p>Have all the owners expressed an intention sell the land for housing, employment or retail use?</p>	<p>yes</p>
<p>Is the land controlled by a developer who intends to develop the land?</p>	<p>Yes/no. If yes, please provide details</p>
<p>Are there any ransom strips, tenancies or operational requirements of landowners which would restrict development?</p>	<p>If yes, please provide details</p> <p>No</p>
<p>VIABILITY MATTERS</p>	
<p>Has the economic viability of the site been assessed? If so, what was the outcome?</p>	<p>Please provide any supporting information</p> <p>No</p>

Please explain why you consider the site to be economically viable (or not).	The site is economically viable for employment uses B1/2/8 in the medium term as an extension of the existing employment area at Lincoln Way, providing new further employment opportunities for Clitheroe.
Are there any abnormal costs/significant constraints that need to be overcome in developing this site?	Please provide details: The northern boundary is the river which is Flood Zone 3 A small section of the northern part in flood zone 2 but could be dealt with through design and mitigation
How many developers would be involved in developing the site should planning permission be granted?	not yet known
What would be a realistic timescale for developing the site	Start date: 2023 End date: 2028
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)	not yet known
CAPACITY AND CONSTRAINT MATTERS	
What is your estimate of the potential capacity of the site? (no. of dwellings/ overall m ² if employment land / m ² retail floorspace)	up to 300,000sq ft
Are there any physical constraints which would restrict development of the site?	mitigation of northern portion from flood risk
Has any work been undertaken to assess how these constraints might be overcome?	no
Is there direct access to the site from the adjoining road network?	yes through other land under same ownership see blue land on attached location plan
Are there any major issues regarding access to the site, and if so briefly what are they?	negotiations have commenced with RVBC regarding link to Lincoln Way

Are there any trees on site protected by Tree Preservation Orders?	none aware of
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)?	Yes EA map shows the river adjacent to the northern boundary is in EA Zone 3. A small part of the north of the site in Zone 2 but could be addressed through design and mitigation.
Please explain why you think the site is a suitable location for development.	Extension of Clitheroe's main employment area rounding off and abuts the settlement boundary of the main settlement. Sustainable location. Policy compliant to RVCS DS1
If there are any other issues that you wish to raise in relation to this site, please do so here.	This would be the third phase of the employment development in the medium to long term following development of the area edged blue which will need to be developed first to enable suitable access.

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.

Name (print)	
Signature	
Organisation	
Date	

