

Ag 29

For official use		Ref. No.
		Ack'd

**Ribble Valley Housing and Economic Development – Development Plan Document (HED DPD)**  
**Regulation 19 (Publication) comments response Form**



Before using this form to make any comments please ensure that you have read the Housing and Economic Development – Development Plan Document and the Guidance Notes, which can be found on Ribble Valley Borough Council's website - [www.ribbonvalley.gov.uk](http://www.ribbonvalley.gov.uk) and follow the HED DPD.

If after reading the Guidance Notes you should have any queries in completing the form please telephone 01200 425111.

This form has two parts: -

Part A - Personal Details (you need only complete one copy of Part A)

Part B - Your comment(s) (Please complete a separate Part B for each comment you wish to make.)

All completed comments forms must be received by the Council no later than 5:00pm on Friday 9th June 2017.

Please return paper copies marked 'HED DPD PUBLICATION CONSULTATION' to Council Offices, Church Walk, Clitheroe, BB7 2RA

**Part A**

**Q1** Please can you provide the following information which will assist us in contacting you if we need to discuss any of your comments further.

Name	[Redacted]
Name of Organisation (if you are responding on behalf of an organisation)	SWPC LTD.
Database Reference number (if you have one)	[Redacted]
Address	[Redacted]
Post Code	[Redacted]
Email Address	[Redacted]
Phone number	[Redacted]

Copies of all comments made in Part B of the form will be put in the public domain and are not confidential, apart from any personal information. All personal information within Parts A and B will only be used by the Council in connection with the Local Development Framework and not for any other purpose and will be held in accordance with the Data Protection Act 1998. The Council will summarise the comments and all representations will be made available to the Planning Inspectorate.

**Part B**

Please use a separate form for each individual comment.

**Q2**

Name / Name of Organisation (if you are responding on behalf of an organisation)

STONYHURST COLLEGE

**Q3**

To which part of the HED DPD does this comment relate?

Part of document e.g. Housing allocations, open space policy etc...

PROPOSALS MAP

Paragraph No.

HURST GREEN

**Q4**

As a consequence do you consider the HED DPD is:

- i) Legally compliant
- ii) Sound \*

Yes

No

\* The considerations in relation to the HED DPD being sound are explained in the Guidance Notes

**Q5**

If you consider the HED DPD is unsound, is this because it is not... (please tick the appropriate box)

- Justified
- Effective

- Consistent with national policy
- Positively prepared

**Q6**

Please give details of why you consider that the HED DPD is not legally compliant or sound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the HED DPD, please also use this box to set out your comments. Please continue on a separate sheet if required.

JUSTIFIED:- DESPITE STONYHURST'S PLACE AS ONE OF THE BOROUGH'S LARGEST EMPLOYERS THE DPD AND PROPOSALS MAP SINGULARLY FAIL TO ACKNOWLEDGE THIS - EITHER IN POLICY OR ALLOCATION TERMS. IT SHOULD DO BOTH. THE WRBENT STRATEGY FAILS TO SUPPORT EXISTING SIGNIFICANT EMPLOYERS THAT MAY REQUIRE ADDITIONAL DEVELOPMENT TO SUSTAIN THEIR BUSINESSES.

EFFECTIVE:- WHILST THE DPD MAKES PROVISION FOR EMPLOYMENT LAND TO MEET THE RESIDUAL REQUIREMENT, IT DOESN'T SEEK TO PROTECT OR ENCOURAGE DEVELOPMENT OF EXISTING EMPLOYMENT SITES IN THE COUNTRYSIDE, IN ORDER TO MEET EXISTING AND FUTURE NEEDS FOR GROWTH.

CONSISTENT WITH NATIONAL POLICY:- PARA 21 OF NPPF REQUIRES PLANS TO ENCOURAGE SUSTAINABLE ECONOMIC GROWTH AND SUPPORT EXISTING BUSINESS SECTORS AND SUCH POLICIES SHOULD BE 'FLEXIBLE'. THE DPD HAS LITTLE FLEXIBILITY IN THIS REGARD.

POSITIVELY PREPARED:- THE RELATIONSHIP BETWEEN THE COLLEGE AND HURST GREEN VILLAGE IS NOT ACKNOWLEDGED. THE COLLEGE'S DEVELOPMENT HAS INFRASTRUCTURE IMPLICATIONS THAT ARE NOT ACKNOWLEDGED.

**Q7** Please set out what change(s) you consider necessary to make the HED DPD legally compliant or sound, having regard to the test you have identified at Q5 above where this relates to soundness.

You will need to say why this change will make the HED DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be precise as possible. *Please continue on a separate sheet if required.*

STONYHURST COLLEGE AND ITS ESTATE SHOULD BE SUBSUMED WITHIN THE HURST GREEN SETTLEMENT BOUNDARY AND ITS RELATIONSHIP TO THAT VILLAGE ACKNOWLEDGED.

A SPECIFIC POLICY SHOULD BE DRAFTED FOR THE COLLEGE THAT RECOGNISES THE NEED FOR ITS EXPANSION AND IMPROVEMENT - BOTH IN RESPECT OF EDUCATIONAL DEVELOPMENTS AND ANCILLARY DEVELOPMENT - INCLUDING LIMITED RESIDENTIAL DEVELOPMENT, SEE REGULATION 18 REPS PREVIOUSLY SUBMITTED AND ATTACHED HERE. THE POLICY WILL REQUIRE THE PREPARATION OF A MASTERPLAN TO ENSURE DELIVERY.

**Please note:** your comment should cover succinctly all the information, evidence, and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be another opportunity to make further comments based on the original comment made at the publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination in the forthcoming Examination in Public. Please note also that the Inspector is not obliged to consider any previous comments that have been made in respect of the HED DPD. You are urged, therefore, to re-submit on this form any previously submitted comments that, in your view, remain valid and that you wish the Inspector to consider.

**Q8** If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I do wish to participate at the oral examination

**Q9** If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Please note that the Inspector will determine who participates.) Please continue on a separate sheet if required.

THIS IS A SIGNIFICANT REPRESENTATION FOR A LARGE EMPLOYER IN RIBBLE VALLEY AND WHICH RAISES A NUMBER OF COMPLEX ISSUES. A VISIT TO THE COLLEGE BY THE INSPECTOR IS ESSENTIAL IN ORDER TO APPRECIATE ALL ECONOMIC, SOCIAL AND ENVIRONMENTAL FACTORS.

**Q10** If you wish to be kept informed as the HED DPD progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the box(es) below.

Submission of the HED DPD to the Secretary of State for Independent Examination

The publication of the Inspector's report following the Examination

The formal adoption of the HED DPD

**Q11** If you have any other comments to make on the HED DPD that have not been covered elsewhere, please use the box below. Please continue on a separate sheet if required.

[Empty box for additional comments]

**Q12** Date of completion: 09/06/2017

**Q13** Signature

[Redacted signature box]

Thank you very much for taking the time to complete this comments form, your comments are very much appreciated.

If after reading the Guidance Notes you should have any queries in completing this form please telephone 01200 425111



**Representations to Ribble Valley Local Plan:  
Housing and Economic Development DPD – October 2016  
Regulation 18 Issues and Options Consultation Response  
On Behalf of Stonyhurst College**

1. This written representation is submitted by JWPC Ltd on behalf of Stonyhurst College in response to the Issues and Options Consultation of the Ribble Valley Housing and Economic Development DPD. This document should be considered alongside the wider representations made by JWPC Ltd as a practise which address Borough-wide Strategic Development matters and the ability of the DPD to deliver the Development Strategy.
2. Stonyhurst is a unique asset within the Borough. It is a world renowned educational establishment, major employer, rural estate, housing provider, and custodian of exceptional heritage assets. Save for a fleeting mention of Stonyhurst within the 'Spatial Portrait' section of the Core Strategy, that document does not address the special circumstances surrounding the College and Estate. The Issues and Options consultation document for the Housing and Economic Development DPD fails to address this entirely.
3. Extending to approximately 75 Hectares, the Historic Park and Gardens of Stonyhurst is the core of the historic campus of the College and along with St Mary's Hall and associated land and buildings represents a significant built development within the Ribble Valley. Indeed, the Local Planning Authority has been fully supportive of Stonyhurst's needs to expand and improve educational, sports and residential facilities within the College in recent years and it continues to develop a highly competitive educational environment. The need to offer world-class facilities and infrastructure at the College is the basis upon which this representation is made.

4. We submit that given the importance of the College to the Borough's economic development, the omission of any reference to the College or specific designation within the Draft DPD is a considerable oversight that should be addressed. Economic benefits are not only accrued from the considerable levels of staffing at the College<sup>1</sup>, but also the contribution the College makes to the local supply and services networks locally within Hurst Green, to the Ribble Valley, Lancashire and beyond.
5. In addition, the College's position as a landlord and custodian of a large numbers of designated and non-designation heritage assets should be fully addressed, not solely through an illustration on the Proposals Map which shows the extent of the Historic Park and Garden designation. There are currently buildings totalling around 500,000ft<sup>2</sup> in area (GIA) on site with intentions to extend this. There is no doubt that were the site of the College a more typical 'employment' site (i.e. Class B1, B2 or B8 uses), that it would benefit from a specific land use designation within the Proposals Map and tied back to a relevant employment policy.
6. Finally, the special role the College plays as a landlord to staff in particular requires closer assessment. The College currently owns 68 dwellings on its Estate, five of which are currently being refurbished and five are derelict. Indeed, whilst considerable work has been undertaken to modernise and sensitively refurbish this stock, there remains considerable work to be done. The College is in the process of investing some £2.5m on existing assets and is entering a Joint Venture to deliver some 30 houses in Hurst Green half of which will be retained by the school for staff and key worker staff. As a Borough Ribble Valley has average house prices far ahead of the average for Lancashire and is close to the national average (as at 2012)<sup>2</sup>. Within Hurst Green these already high prices are bolstered by the presence of Stonyhurst itself, effecting both rental and purchase prices of houses. The village falls within the 'Rural Area' as defined in the SHMA where house prices are greater than 135% of the median average for the Borough<sup>3</sup>. Teaching staff find it extremely difficult to relocate to homes local to Stonyhurst and therefore the estate housing is an essential element of the functioning of the College.
7. A further issue relates to the size and suitability of the housing stock. At present, there are too many larger houses and not enough smaller units. Sub-division is not always possible given the listed nature of several in particular. Without a fit for purpose housing stock the College will struggle to attract and retain the best teaching staff. Improving the existing housing stock is the first step in improving retention rates but more accommodation is required.

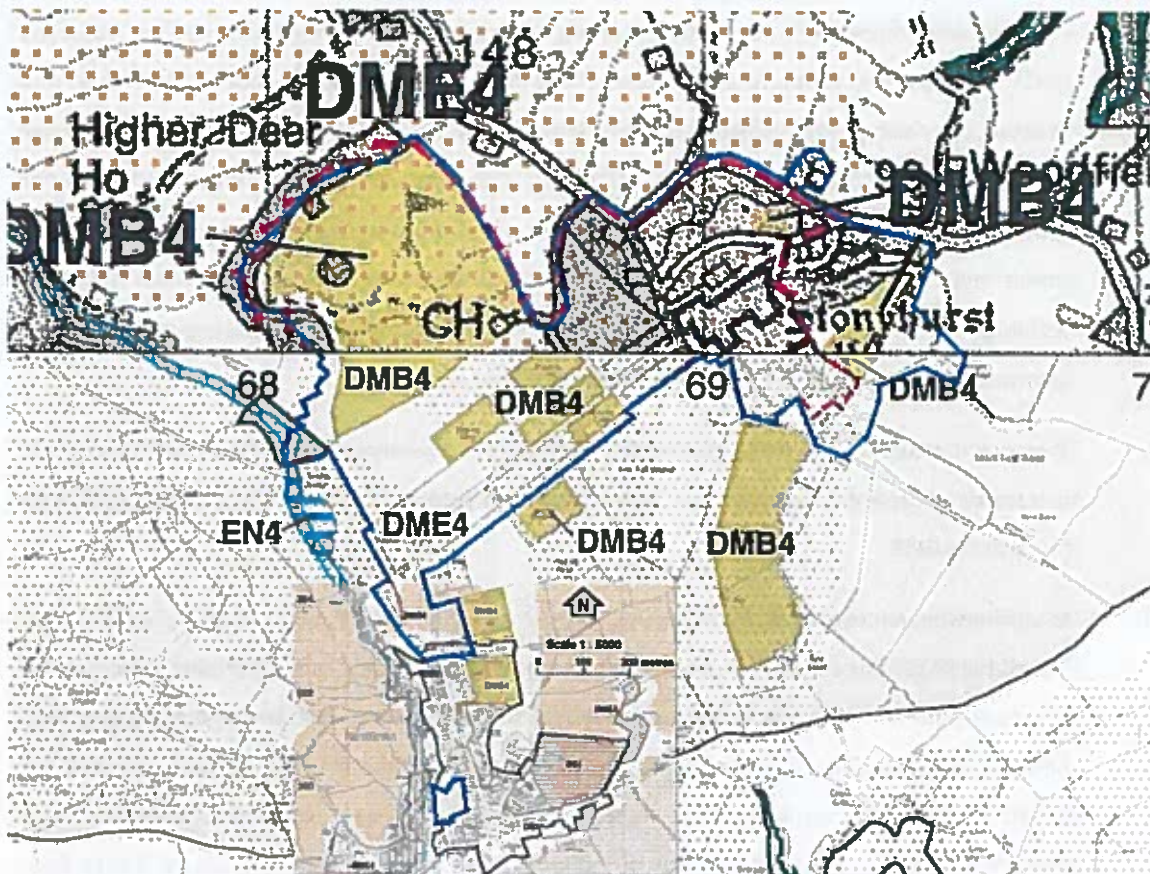
---

<sup>1</sup> Circa 300 Full Time Equivalent staff

<sup>2</sup> Paragraph 4.4 of RVBC Strategic Housing Market Assessment (June 2013)

<sup>3</sup> Figure 44 of RVBC Strategic Housing Market Assessment (June 2013)

8. A further consequence of the poor staff housing stock is the lack of willingness of staff to 'put down roots'. It is common for many staff to leave their rented accommodation out of term time. It is however, the vision of the College to provide better, family housing across the Estate to encourage staff to continue to live their throughout the year, thus contributing to the local community and economy in a more sustainable manner. Moreover, it is important to acknowledge that some staff cannot move to the area due to lack of demand and thus commute long distances. Matching additional accommodation to employment would represent a sustainable development approach advocated within both NPPF and Policy DS2 of the RV Core Strategy.
9. The current situation is so acute that the College rents four dwellings from other landlords in order to accommodate staff. This is an unsustainable and uncertain position which could be addressed through this DPD.
10. It is acknowledged that Hurst Green itself is a Tier 2 settlement as set out and defined within Policy DS1 of the RVCS and as such housing that meets 'proven local needs' and other development that delivers regeneration benefits is supported. Whilst the College does own land and buildings within the settlement boundary of Hurst Green, any development within the College campus would not benefit from such a positive policy. Indeed, Policy DMG2 places significant constraints upon development in the Open Countryside within which the majority of the Stonyhurst Estate falls. Notwithstanding the support and previous planning approvals at Stonyhurst, this does not give sufficient confidence or certainty to the College that it will be able to deliver the facilities and accommodation which are essential to its continued viability.
11. Stonyhurst College therefore objects to the drafting of the settlement boundary for Hurst Green and offers an alternative that seeks to enlarge it to include the Stonyhurst College grounds. This would largely replicate the DME4 designation (red broken line) but would be slightly enlarged to include St Mary's Hall area of the site. See image below.



*Fig 1: Proposed extension of Hurst Green Settlement Boundary (blue line)*

12. In making such an amendment to the settlement boundary of Hurst Green to include the Historic Park and Garden designation of Stonyhurst, the Council can be assured that it would not lead to inappropriate expansion of the settlement or any inappropriate development that could not be defended given that the heritage designation provides a considerable additional layer of protection. Furthermore, Policy DS1 limits such development to 'small-scale developments' where such settlements are 'appropriate for consolidation and expansion or rounding-off of the built up area'. Together, these additional layers of protection and policy constraint will provide sufficient comfort that such an extension to the settlement boundary would not lead to development contrary to the development strategy.
  
13. Expansion of the settlement boundary and by dint, Tier 2 Village status alone would not however, facilitate the level of new development that College anticipates. To this end, it is submitted that a specific policy should be provided within the Housing and Economic Development DPD in relation to Stonyhurst.



14. This needs only be displayed as an asterisk or other marker on the Proposals Map as the Stonyhurst Estate extends into Open Countryside and includes the hamlets of Woodfields and Stockbridge. A boundary for the Estate may be too restrictive in this regard.
15. Given the complexity of issues faced by Stonyhurst and the diverse needs of pupils, staff, the heritage asset and wider functioning of the College, it is proposed that a Masterplan is produced and agreed with the Council insofar that carries weight in the Development Management process. Such a Masterplan would be funded and prepared by Stonyhurst College with the Council's input.
16. The 'Stonyhurst Policy' should seek to ensure that any development on the Stonyhurst Estate is in accordance with that Masterplan. Such a policy would allow Stonyhurst to undertake, with the relevant expertise and liaise with the Council, a thorough assessment of the whole estate and to identify areas for potential development: whether it be residential development for staff; open market housing to be disposed of to 'enable' College development or conservation work; or any other College development for the educational purposes. This would address significant infrastructure issues at and around the College such as access and traffic management, landscape and drainage. Such a Masterplan would allow each issue to be considered against the other in a holistic manner whilst assessing each proposal against heritage and other matters of acknowledged importance.
17. Whilst the Issues and Options paper does make reference<sup>4</sup> to other development beyond Tier 1 settlements, it states that no policies or allocations will be made in the DPD. Stonyhurst must be considered as an exception to this (otherwise perfectly sensible) proposal. The Issues and Options document simply does not address the matters at play at Stonyhurst and progression of the Draft DPD to adoption would significantly and irrevocable harm the ability of the College to continue to: 1. Improve its existing stock of building and 2. Continue to grow and evolve to remain competitive on the International educational stage. Rather than seek to 'row back' from the Core Strategy position or propose policies to the HED DPD that may not be consistent with the Core Strategy, by proposing a bespoke policy for Stonyhurst, it is submitted that the Council can ensure that it would be both a sound policy and would be framed in such a way as it would not set any unwelcome precedent.
18. Stonyhurst College has a significant contribution to make to the sustainable development of the Ribble Valley. In terms of the economy of the area, through employment and procurement

---

<sup>4</sup> Paragraph 10.5.25 of the Issues and Options Consultation (RVBC Housing and Economic Development DPD)

of supplied and services; it offers a social function, through its exceptional educational offer and on-site facilities; and also an environmental function, as custodians of heritage assets that are exceptional in both quality and scale. Stonyhurst cannot simply be considered as a site in the Open Countryside on the Proposals Map. It should be included within the Hurst Green settlement boundary with a bespoke Policy and Masterplan to guide future development.

19. Stonyhurst welcome the opportunity to discuss the proposal of a 'Stonyhurst Policy' within the HED DPD with Council officers. Given the unique contribution the College makes to the Borough, the publication and approval of a Masterplan will provide the necessary security for the College and in doing so, help drive a considered development strategy for the benefit of the College, its staff and pupils as well as the wider community for many years to come.

*JWPC Ltd*

*October 2016*