Representation on behalf of [redacted]

REPRESENTATION

Description:
Representation to Ribble Valley Borough Council Core Strategy 2008 - 2028 Regulation 19 Consultation Draft.

June 2012
# Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 Introduction</td>
<td>2</td>
</tr>
<tr>
<td>2.0 Statement of Objections</td>
<td>3</td>
</tr>
<tr>
<td>3.0 Summary &amp; Conclusions</td>
<td>8</td>
</tr>
</tbody>
</table>
Chapter 1

Introduction

1.1. We are instructed by\[\text{Instructed by:}\] to lodge the following representations to the Council's Core Strategy 2008-2028 Regulation 19 Consultation Draft (CSCD).

1.2. The representations essentially relate to aspects of the proposed preferred option regarding employment land and specifically in respect of the "Barrow Enterprise Site" as set out at paragraph 4.2 - Key Statement DS1: Development Strategy together with paragraph 4.11 and the Key Diagram.

1.3. For reasons set out in these representations it is contended that the CSCD is unsound as the manner in which the strategy under DS1 has been addressed is ambiguous and or unjustified.
Representations Statement

2.1. The Key Statement DS1: Development Strategy states that "...strategic employment opportunities will be promoted through the development of the Barrow Enterprise Site as a main location for employment, and the Salmesbury Enterprise Zone..." This is further emphasised at paragraph 4.11 which states that "...the existing site at Barrow Enterprise Park would continue in its role as the borough's principle strategic location for development..." together with the Key Diagram which specifically identifies the Barrow Enterprise (BEP) and that part of the "Salmesbury Enterprise Zone" which lies within Ribble Valley.

2.2. We wish to stress from the outset that our clients raise no objection whatsoever to the existing Barrow Business Park (BEP) continuing in its role as a main location for employment, in conjunction with those other possible sites, general locations &/or opportunities currently referred to in the CSCD and which have yet to be defined in more detail in subsequent Development Plan Documents / Site Allocations DPD. Whilst the location of the BEP, being relatively remote from the main urban areas, is not one which would ordinarily have been appropriate for such a strategic role, the historical context, extant planning permission and existence of highway infrastructure etc is clearly of relevance and justifies the Council's stance in continuing to retain and promote the undeveloped remaining land in the BEP for employment purposes.

2.3. However, our clients' understandable concerns are that the CSCD DS1 appears to place an unsubstantiated emphasis on the potential role of the BEP to the extent that, as currently worded, it could be interpreted that the site may be appropriate for an extension to accommodate a large element of the additional 9.0 hectares of employment land which Key Statement EC1: Business and Employment Development states is required to meet employment needs to 2028. Whilst some limited extension to the BEP may be appropriate in principle, following proper consideration through the LDF procedure, the manner in which it has been addressed in the CSCD has resulted in an unnecessary and inappropriate lack of clarity which is likely to be unhelpful at the subsequent Site Allocations or Housing & Economic Needs DPD stage.
2.4. In respect of the above it is noted that the CSCD also identifies the following additional options for potentially accommodating the stated 9.0 hectares of required employment land:-

- Paragraph 7.3 *Broad location of new employment development* states that employment development will generally be directed to the main areas of population growth linking to the underlying strategy of aligning jobs with homes in key areas. This is further emphasised at paragraph 7.4 which states that the larger settlements of Clitheroe, Longridge and Whalley "... would be the preferred locations for new employment development". The BEP location clearly does not accord with either of these preferred locations as Barrow is by comparison a small village with a population of 858 and with limited facilities (i.e. as taken from the Council's Settlement Strategy dated December 2008).

- Paragraph 7.4 also states that suitable locations that are well related to the A59 corridor "... will also have the potential to deliver economic growth through the delivery of appropriate sites". Whilst the BEP is well related to the A59, the paragraph goes on to suggest the following additional option to meet the stated employment needs to 2028 and which would also be well related to the A59:-

  - "The potential for appropriate land to be brought forward as part of strategic land releases will also be considered particularly where this will contribute to greater sustainability." In this respect it is noted that paragraph 4.11 states that employment land can also be included within land at Standen to the south of Clitheroe to generate a mixed development opportunity. Furthermore, Key Statement EC1 states that "opportunities to identify land as part of appropriate mixed-use schemes within any strategic land release will be considered favourably." Such an opportunity would seem to more readily accord with the CSCD statement that employment development will generally be directed to the main areas of population growth.

- EC1 additionally states that priority will be given to the use of appropriate Brownfield sites to deliver employment-generating uses including a preference for the reuse of existing employment sites before alternatives are considered.
Following on from DC1, the Key Statement EC1 states that "... the Council considers ... that the BAe Samlesbury site should be regarded as a regionally significant employment site with considerable potential to accommodate a variety of advanced knowledge based industries in the future. This has been recognised by the Government’s proposals to create an Enterprise Zone at this location." It is not however entirely clear whether it is the intention of the CSD to potentially accommodate some of the 9.0 hectares of employment within this particular site, for which it is understood that approximately 8.0 hectares lies with Ribble Valley Borough. Whilst the Local Development Order relating to this site, would authorise development within use Class B in relation to advanced engineering, manufacturing & ancillary uses, it is unclear in the CSD as to whether such development could in fact assist in meeting the stated requirement for the 9.0 additional hectares of employment land.

2.5. It is accordingly apparent that the CSD incorporates a wide range of options and possibilities to accommodate the stated requirement for the additional 9.0 hectares. It is therefore considered to be inappropriate to effectively imply in DS1 and in the Key Diagram that a BEP extension could potentially be a main recipient for such additional employment land.

2.6. If it is the Council’s intention through DS1 & the Key Diagram that an extension of the BEP, as the borough’s "principle strategic location for development," could appropriately accommodate a large element of the 9.0 hectares, then it is contended that such an approach would be unsound, particularly as there does not appear to be any substantial and recent evidence base or stated reasoning behind such a stance. Key Statement EC1 simply states that the Council will aim to allocate an additional 9 hectares of land for employment purposes in appropriate and sustainable locations during the lifetime of the plan. It appropriately makes no reference whatsoever to the BEP site as it correctly implies that decisions on where to provide the 9.0 hectares will be matters for the subsequent site allocations stages.

2.7. It is acknowledged that the Council’s 2008 Employment Land and Retail Study (ELRS) identified, at Table 83, the “Admiral Taverns” site as a possible 4.2 hectare northerly extension to the business park. It is however in this context surprising that the ELRS did not refer to the potential for a south easterly extension of approximately 1.1
hectares of land, between the BEP and the A59, as a most logical extension to the BEP.

2.8. Furthermore and in any event, the ELRS was produced prior to the current CSCD which now proposes the preferred option of strategic housing growth at Sabden, south of Clitheroe and which, as stated above, is also identified in the CSCD as having potential to accommodate employment as a mixed use strategic site. This would indeed seem to provide a most appropriate and sustainable opportunity to accommodate much of the required employment land, being as it is better & more closely related to the main urban area of Clitheroe whilst also being located within the A59 corridor. It is accordingly considered that this stated potential opportunity should also be highlighted in Key Statements DS1 and EC1 together with the Key Diagram.

2.9. It is acknowledged that the CSCD and Key Statement EC1 does not propose any specific employment site allocations (other than Samlesbury) and that such issues are clearly matters which will be addressed in more detail at the subsequent site allocation DPD stages. However, it is important that the CSCD does not unnecessarily influence or prejudice a proper consideration of all the potential employment sites at the subsequent site allocations stages or indeed, in the interim, during the consideration of planning applications relating to employment land.

2.10. Whilst the weight to be given to the CSCD in the determination of applications will increase as it progresses through to its eventual adoption, the document is nevertheless a material consideration (albeit with limited weight) and will no doubt be addressed in the preparation for and determination of various planning applications and appeals. In this respect, we are aware for example that there is a planning application (3/2012/0346) currently before the Council seeking approval for B1, B2 & B8 industrial use on approximately 6.0 hectares of land to the north of the BEP and for which we are instructed to lodge objections. The manner in which the CSCD has effectively singled out the BEP under Key Statement DS1 and on the Key Diagram, could be, and indeed is effectively being, used by the applicants in an attempt to try and justify their proposed 6.0 hectare extension of the BEP.

2.11. In light of the various potential opportunities for accommodating future employment needs to 2018 as set out in the CSCD it is requested that DS1 and the Key Diagram, together with associated supporting text, be amended in a manner which better
clarified that a BEP extension is only one of a number of potential sites and that decisions on where and to what extent any particular site could accommodate future employment needs will be a matter for consideration at subsequent site allocation DPD stages. In so doing, the CSCD could continue to promote the existing BEP as a strategic location for employment, but without unnecessarily implying that it is in effect the main contender for accommodating additional future employment land.

2.12. In conclusion, it is contended that the CSCD is unsound particularly in the manner in which it has effectively highlighted the BEP as set out under DS1 and the Key Diagram. The proposed strategy is unclear and ambiguous as it appears to place an unnecessary and unjustified emphasis on the BEP whilst the rest of the CSCD suggests a variety of other possible alternatives which could also meet the required 9.0 hectares of employment land. In this respect the strategy is either ambiguous or is not substantiated when considered against the other reasonable alternatives as set out in the CSCD and when based on proportionate evidence available.
Chapter 3

Summary & Conclusions

6.1. No objection is raised to the BEP being included within Key Statement DS1 as an existing main location for employment, however if this is what DS1 is implying, then it should be more explicitly stated.

6.2. If however DS1 is implying that the BEP is to be the main recipient of the Borough’s future requirements for 9.0 hectares, then we would wish to lodge objections to this on the basis that the CSCD would be unsound for the reasons set out in these representations.

6.3. In the above eventuality, we would request that either (i) the additional options for meeting such requirement are also referred to in DS1 and the Key Diagram, in particular to the potential for employment to be incorporated at the proposed Standen strategic site south of Clitheroe or (ii) that the reference to the BEP in this particular context be excluded.

6.4. We are however in support of the essentially non-site specific manner in which Key Statement EC1 has stated that the allocation of an additional 9 hectares of land for employment will be located at appropriate and sustainable locations. In this respect, consideration and decisions on the locations for such allocations will be correctly left for the subsequent DPD stages following adoption of the Core Strategy.

6.5. Further clarification is also requested as to the role of the Samlesbury Enterprise Zone in potentially contributing towards the required additional 9 hectares of employment land.