**Philip Dagnall**

**From:** J[redacted]
**Sent:** 09 April 2019 10:31
**To:** pmods22
**Subject:** Representations to Ribble Valley BC Housing and Employment Development DPD (HED DPD) Main Modifications - housing post EiP
**Attachments:** Final letter to LPA 9.4.19 sig.pdf; EA map for Huntroyde site, Chatburn Rd, Clitheroe 5.4.19.pdf



Dear Sirs

Please find attached representations to the HEDDPD Main Modifications housing sites post EiP consultation on behalf of our clients the Huntroyde Estate.

Please confirm receipt of these representations and that they have been made in due time.

We ask to be kept informed of any further consultations and of the EiP inspector's final report.

Regards

[redacted]

**Director**

**Dickman Associates Ltd**

**Chartered Town Planning and Development Consultants**

[redacted]

Dickman Associates Ltd

[redacted]

Main Modifications Consultation
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

9.4.19

Dear Sirs,

**Representations to Ribble Valley BC Housing and Employment Development DPD (HED DPD) Main Modifications - housing post EiP consultation 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 this consultation. We confirm 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.

As you are aware from our earlier representations to the SHLAA 2013 and subsequently to various stages of the HEDDPD public consultation and EiP process, our clients have a number of land holdings within Ribble Valley BC (RVBC) area, which have been previously submitted for consideration, and will not be repeated here and those comments remain. You will therefore be aware that they are the sole owners of two of the Main Modifications (MM) sites, namely:

1. Land NW of Chatburn Road, Clitheroe (MM1)
2. Land at Haugh Head, Simonstone (MM5)

We note that this consultation process now includes the previously excluded Sustainability Appraisal (July 2018) and the 5 MM sites. We acknowledge that the consultation notification document advises that representations should only be made regarding the 5 MM sites which in addition to our clients' sites include:

a. MM2 Land off Hawthorne Place, Clitheroe
b. MM3 Highmoor Farm, Clitheroe
c. MM4 South of Laycocks Farm, Langho

The 5-year Housing Land Supply (5HLS) was discussed at length during the EiP and the Inspector will reach his own conclusions on that matter.

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Apart from the strategic site at Standen RVBC have not made any housing site allocations subsequent to their Core Strategy and the current HEDDPD document is only a partial review which originally identified 2 sites HAL1 at Mellor (which the landowner has now retracted) and HAL2 at Wilpshire which has a plethora of constraints.

We have read the documents for this current consultation and now make representations on behalf of our client and also provide updates in regard to their sites MM1 and MM5.

The SA dates from July 2018 and has not been updated to exclude sites which are no longer available.

In regard to the MM sites in the SA, that form part of this consultation, we disagree with the assessment that the addition of 20 units in Read/Simonstone will have a significant impact on highways and peak hour congestion. From our previous experience of development sites of such size, on a settlement the size of Read/Simonstone, the impact is imperceptible. Site MM5 at Haugh Head is an infill between two recently completed residential schemes. To confirm our comments to the EiP our client considers this as a medium term (6-10 year) site but one which could be brought forward into the latter part of the 0-5 year timeframe as required. Therefore, to date, it has not been actively marketed.

In the SA site MM1 Chatburn Road, Clitheroe is shown as suitable for 40 units not 20 units as now proposed in the Main Modifications document. This is well located medium sized housing development site in RVBC's main settlement and is highly sustainable. Our clients are in ongoing active discussions with housebuilders (Oakmere and Storey Homes) regarding the whole of their site at Chatburn Road and once provisional terms are agreed the developers will get the flood risk report prepared and look at mitigation works that would address the EA comments. It is common practice for development schemes to assess and provide flood risk mitigation.

We can also confirm that Oakmere Homes application (LPA Ref No 3/2017/0653) has now been approved following the S106 having been completed. This land is the field to the north of our clients' land, so MM1 will infill between the current built boundary and the Oakmere Homes site.

Site MM1 is a genuine infill site within the principal settlement of Clitheroe (RVCS Key Statement DS1) which is capable of accommodating 40 units as identified in the SA.

However, the SA is erroneous in suggesting the entire site is Flood Zones 2 and 3. In fact the majority of the site is Flood Zone 1 (see attached plan downloaded from EA website 5.4.19). The SA does concur with our view on mitigation enabling the development of the whole site not just the frontage. and notes that *'Given scale of site an FRA will be required and potential mitigation need for SuDs in drainage strategy.'*

The MM consultation document does not show the full extent of our clients' land at Chatburn Road in the Flood Zone overlay plan (the attached EA plan does). We assume the blue hatching whilst only stating Flood Zone 2 in the key may in fact include a 10m buffer referred to in the text, given the extent shown exceeds the EA map. We assume the omission in the key was an oversight.

Site MM1 is in single ownership, has active market interest from housebuilders as stated above and has direct frontage to Chatburn Road. It is well located for access to the town centre as well as the hospital and Clitheroe's northern employment zones. It is a site that is deliverable in total within the 0-5 year timeframe and should be confirmed as a site allocation for 40 units.

We welcome and strongly support the allocation of our clients' 2 sites – MM1 and MM5.

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

Yours faithfully

[redacted]

Enc. EA flood map for MM1

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Environment Agency

# Flood map for planning

| Your reference | Location (easting/northing) | Created |
|---|---|---|
| **Chatburn Rd 3** | **374965/442827** | **5 Apr 2019 11:19** |

**Your selected location is in flood zone 3, an area with a high probability of flooding.**

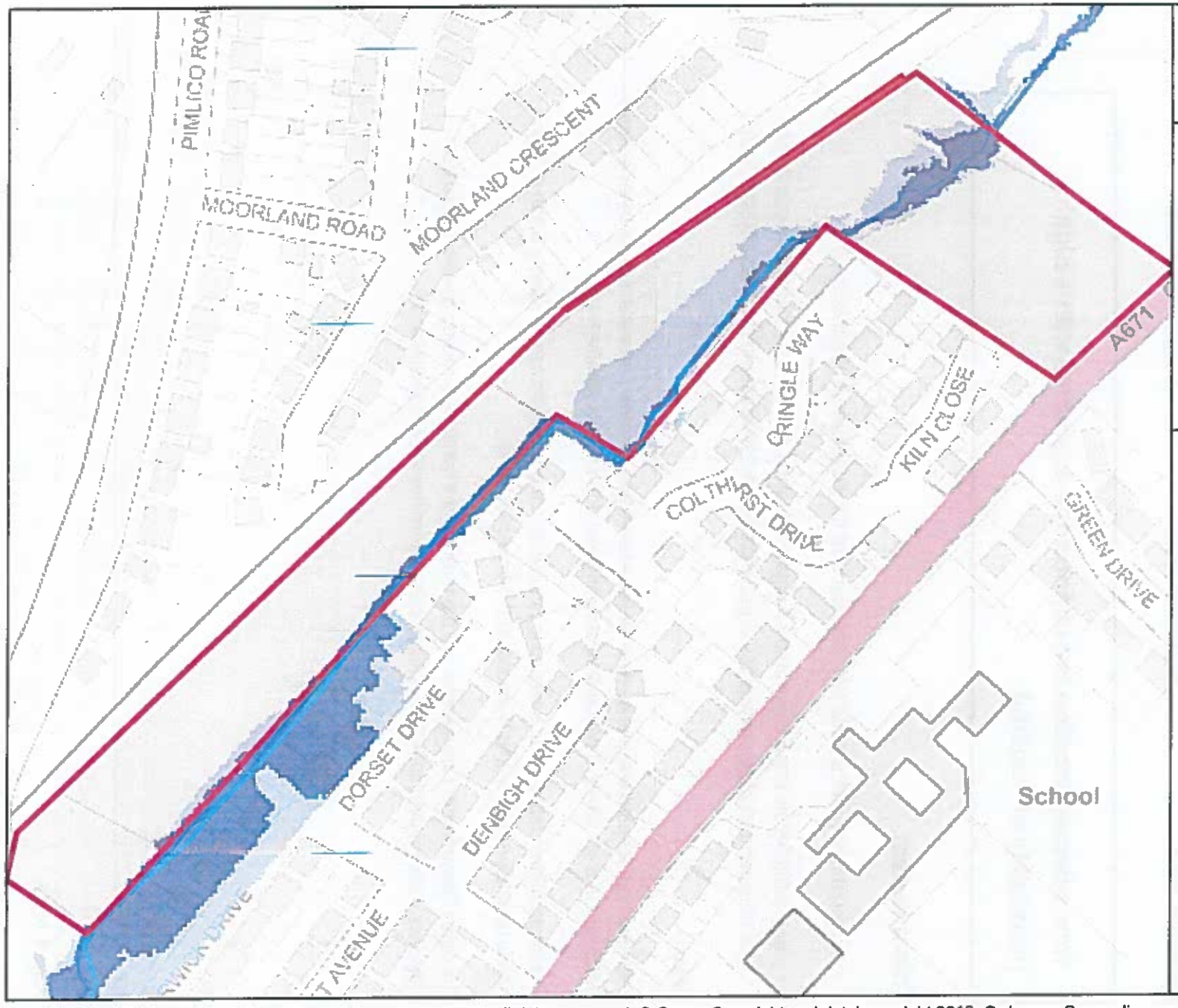
## This means:

- you must complete a flood risk assessment for development in this area
- you should follow the Environment Agency's standing advice for carrying out a flood risk assessment (see www.gov.uk/guidance/flood-risk-assessment-standing-advice)

**Notes**

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.




Environment Agency

**Flood map for planning**

Your reference
**Chatburn Rd 3**

Location (easting/northing)
**374965/442827**

Scale
**1:2500**

Created
**5 Apr 2019 11:19**

- Selected area
- Flood zone 3
- Flood zone 3: areas benefitting from flood defences
- Flood zone 2
- Flood zone 1
- Flood defence
- Main river
- Flood storage area

0 20 40 60m