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Place-shaping and Economic Growth
Harrogate Borough Council
P.O Box 787
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9 October 2020

Dear Sirs

Planning Application ref. no: 20/02973/EIAMAJ
21 And 38 Engineers Claro Barracks, Chatham Road, Ripon, North Yorkshire HG4 2RD

Introduction and Background

Ripon Civic Society makes the following representations regarding the above application. As you will appreciate, this is a complex application and the consultation period is extremely limiting in the opportunity to consider its content. Additional representations may be submitted as and when further information is revealed.

At the outset we must direct you to the made Ripon Neighbourhood Plan (RNP). This was voted on by Ripon residents of whom 86.75% were in favour. As you know, RNP, in addition to policies relevant to this application, contains Community Actions B3 and B4 regarding Clotherholme. We maintain that these are likely to be the most comprehensive and specific response of Ripon residents to the proposed redevelopment and must be given substantial weight in your appraisal of the application and your eventual recommendation.

This is an outline application, with means of access (from Clotherholme Road and Kirkby Road), for a mixed-use development comprising: up to 1300 dwellings (Use Class C3), up to 60 extra care accommodation units (Use Class C2), retail, food and drink (Use Classes E, F2 and sui generis), community facilities (Use Classes E, F1, F2 and sui generis), 2ha of employment land (Use Class E), Primary School (Use Class F1), sports pitches with ancillary facilities (Use Class F2), public open space, landscaping, demolition of existing buildings and structures, and associated works.

We are fully aware that the decision on the application will have regard to the development plan, being the Harrogate District Local Plan (HDLP) and RNP, the National Planning Policy Framework and other material considerations. HDLP contains allocations specific to this application and relevant district wide policies. Whilst we have supported the principle of redevelopment of Ripon Barracks and were prepared to countenance the original allocations of 799 dwellings and 11 hectares of employment land, we never supported the increase to 1300 dwellings and reduction to 2 hectares employment presented in the Statement of Common Ground (SoCG) submitted to the Public Examination. We shall continue to maintain that there was no meaningful public engagement on the SoCG and that any outline consent for the site should allow for a more flexible balance of housing and employment land that can be responsive to future changes in household and employment patterns and infrastructure requirements.

Society members have attended the two exhibitions held by Homes England in 2019. The Society was invited to attend stakeholder events in 2019 and 2020 and did so. The Society has supported the considerable efforts by the leaders of the Ripon Steering Group to facilitate wider engagement between local interested parties and Homes England. Individual members of the Society have attended specific topic events with regard to urban and landscape design (although not on heritage where we could have been expected to have particular interest1 and capability).

Our representation will address the RNP, relevant polices of HDLP and other matters that have arisen from the application content and omissions. Views expressed by our members will be embedded within the overall response. We will aim to be clear how we should like the proposals amended. This is with the intention that the application should be good enough to approve. As submitted we do not consider that it is.

Ripon Neighbourhood Plan

Community Action B3 Clotherholme is written in the voice of Ripon City Council. The Society concurs with *the comprehensive redevelopment proposals for that area of the military estate shown on the Policies Map as a Regeneration Area for what will become the Clotherholme urban village, proposals for this area to include a substantial quantity of housing and range of accommodation, employment and business premises, recreation and community provision and necessary infrastructure. Owing to the scale of development being a substantial urban extension to Ripon, and the opportunity afforded by the particular ownership … would like to see a masterplan for the area be prepared.*

A masterplan indeed has been prepared and this undoubtedly does *include a substantial quantity of housing*. We will comment on whether the *range of accommodation* is appropriate under HDLP later. The masterplan includes an allocation of employment land and we note that the application attempts to address this topic as job creation. There are associated proposals for a village hub. The application appears to be silent on how this will be provided. *Recreation and community provision* are included. Our concern is not only the provision itself but how it is to be delivered over time. You will be aware that the transport element of necessary infrastructure is not convincing. In its present inadequate content and lack of commitment this is a fundamental flaw of the proposals and prevents the Society from supporting the application.

In particular RNP B3 Clotherholme Regeneration Area asks for regard to be paid to (in order but not priority):

- Urban Design. This is addressed.
- Green infrastructure. This is addressed.
- Retention of existing military premises (to be specified) for employment, community, education and recreational purposes in the Claro Barracks built up and technical areas. This is ignored.
- Retention of existing sports field for creation of a sporting village. This is ignored.
- Incorporation of the military roads between Kirkby Road, Clotherholme Road and Galphay Lane into the public highway network. This is ignored.
- Mix, tenure and size of new dwellings. This is addressed.
- Archaeological investigation of the military occupation of the area. This is addressed
- The precautionary identification of a site (of not less than 1.6 hectares) for a primary school. This is addressed.
- The allocation of a site for local shopping and associated community facilities. This is addressed.
- The physical measures required to enable phased release of land and premises from military use. This is ignored.
- Management of the maintenance, conservation and enhancement of the remains open land and woodland within the military estate beyond the Regeneration Area taking account of the Nidderdale Area of Outstanding Natural Beauty (AONB). This is addressed.
- Proposals will be required to demonstrate how they abide by the development principles set out in the masterplan in order to be supported.

Community Action B4 Clotherholme Development Strategy asks for *regard to be paid in the event of a phased release of the military estate … to consider*

- Financial contribution toward the provision of new off-site highway infrastructure and traffic management measures required to alleviate the effects of additional traffic upon the city centre as generated by the development. This is addressed.
- The release of the military sports fields along Clotherholme Road. This is ignored.
- Upon the release of the former Deverell Barracks:

    - the opening to public use of the highway between Clotherholme Road and Kirkby Road (known as Chatham Road) and the financing of any costs required to bring this highway to adoptable standards;
    - the conservation of an exemplar timber barrack block as a local heritage asset regarding the history of the Ripon camp.

  These are ignored.
- Upon release of land and buildings south of Clotherholme Road and the Laver Banks training grounds:
  - a management plan for the maintenance, conservation and enhancement of woodland, open land and riparian environment south of Clotherholme Road and within the Laver Banks training grounds and the financing of any costs for measures arising from the management plan. This is addressed.
- Upon release of the Claro barracks built up and technical areas:
  - the opening to public use of the existing military highway, including the River Laver bridge, to Galphay Lane and the financing of any costs required to bring this highway to adoptable standards and improvement as may be required to the junction of Galphay Lane and Studley Road (B6265). This is ignored.

We make no apology for repeating this important text. We can acknowledge that regard has been paid to parts of these Community Actions but are extremely disappointed that so much has been ignored. This does not reflect the encouragement of the RNP Examiner's report which stated that the Plan *"aims to provide a positive steer to development aimed at providing for sustainable growth"*. Our response to the regard paid to RNP B3 and B4 is included in representation on topics.

Other RNP policies of direct relevance are:
A2 Landscape Character
A3 Skyline policy
C1 City centre quarters
C4 Spa Quarter Improvements
C5 Market Place, Westgate and west of Market Place Improvements
E1 Density and Size of New Market Homes
E2 Support for self-build and custom house-building
F3 Protection and replacement of recreation open space
G2 Walking
G3 Cycling
G4 Mobility
H2 Public Art
H3 External lighting

In addition, other RNP Community Actions are relevant:
C4 Spa Quarter Improvements
G1 New Highways

<u>Harrogate District Local Plan</u>

HDLP makes specific allocations for the proposed redevelopment at:
Policy DM1 Housing
R24 Deverell Barracks, Ripon
R27 Laver Banks, Clotherholme Road, Ripon
Policy DM3 Mixed Use
R25 Claro Barracks, Ripon

It appears to the Society that the following HDLP policies are likely to be of particular relevance:
EC1 Protection and Enhancement of Existing Employment Areas
HS1 Housing Mix and Density
HS3 Self and custom-build housing
HP2 Heritage assets
HP3 Local Distinctiveness
HP6 Protection of Existing Sport, Open Space and Recreation Facilities
HP7 New Sports, Open Space and Recreation Development

HP9 Provision of New Community Facilities
NE1 Air Quality
NE4 Landscape character
NE5 Green and Blue infrastructure
NE9 Unstable and Contaminated Land
TI1 Sustainable Transport
TI4 Delivery of New Infrastructure
TI6 Provision of Educational Facilities
CC1 Flood Risk and Sustainable Drainage
CC3 Renewables and Low Carbon Energy
CC4 Sustainable Design

Our representations

The Society's representations are shown by topic as follow and will refer to RNP and HDLP as appropriate. The changes sought are set out at the end of each topic as "asks".

Housing mix and density
The proposed housing mix should be more flexible to allow for more 3 bed family dwellings to meet local needs in Ripon and to achieve a sustainable community. The proposed mix is 72% I-bed and 2-bed and only 21% 3-bed. HLP HS1 refers to a range of house types and evidence in the HEDNA 2018 states that the focus of delivery in Ripon should be 2- and 3- bedroom properties. This is contradictory.
Consideration needs to be given to building more homes suitable for home working in the post Covid-19 economy, and which would require larger more flexible dwellings with space for home offices. The HEDNA appears now to be out of date. To achieve a flexible and sustainable dwelling mix, the total number of dwellings which can be accommodated on the site may need to be less than 1300. The parameter plan for building heights reveals the substantial extent of building up to 3.5 storeys which we contend is driven by the pressure for dwelling number more than urban design.
Given the ambitious number of dwellings sought, there is a risk of obtrusive impact on Ripon's countryside edge. RNP E1 allows for reduction in density to ensure that sufficient space is provided within the development (including both public areas and residential curtilages) in order to accommodate a mature perimeter tree canopy. Accordingly the rigid pursuit of dwelling number must not result in a hard edge to the countryside.

Ask: There needs to be an explicit monitoring arrangement for Clotherholme that regularly assesses the suitability and impact of housing provision and, if justified, reduces the dwelling yield from the development. The outline consent should also be flexible, up to 1300 dwellings, and the mix should be reassessed at each reserved matters stage, based on the latest HEDNA. This process should have community engagement.

Self and custom build housing
RNP E2 and HDLP HS3 requires strategic sites of 500 dwellings or more to supply at least 5% of dwelling plots for sale to self-builders. There is no indication of such provision in the application or accompanying documents. To satisfy this policy, 5% of the plots i.e. 65 should be identified for self and custom build housing. These plots should be of adequate size for self and custom builders.
The application appears to be silent on where, when and how these plots will be made available.

Ask: A specific delivery plan for self-build and custom build housing is needed and should be covered by a condition.

Employment land and jobs
The employment land element in HDLP Policies EC1 and R25 of 2 ha and the split of uses is derived from background studies prepared for the Harrogate Local Plan at least two years ago. Previous reporting also took a demand-led approach to provision of premises and land rather than a supply-led one which has proven successful in flagship regeneration projects by pro-active and entrepreneurial developers. It is considered that employment patterns are likely to be changing, particularly post Covid-19, with more demand for home working and for more employment provision close to home to

reduce travel. If the aim of the development is to achieve a sustainable community, consideration should be given to increasing the amount and nature of employment provision on the site with increased opportunities for home working. This may result in a different balance of uses with fewer dwellings and more jobs within the development. It should also keep in question the necessity for wholesale demolition of existing buildings across the site. We contend that a new employment report for Clotherholme, including its place in Ripon and its hinterland, is needed.
Accordingly the 2 ha needs to be kept under review as the absolute minimum.

Ask: There needs to be an explicit monitoring arrangement for job creation and economic activity at Clotherholme that regularly assesses the suitability and impact of employment provision. The amount of employment land/number of jobs should be flexible with 2 ha as a minimum. An up to date employment land study should be required by condition and the overall site mix may need to be altered as a result. If justified, the dwelling yield from the development should be reduced in favour of provision of employment and business premises. This process should have community engagement.

School places
HDLP T16 requires larger urban extensions such as Clotherholme to provide new schools to meet the needs of the proposed development, which will be met through the development of new facilities on these sites. In other cases, there is a need for developer contributions to be made in order to facilitate additional classrooms at existing schools. This is often a contribution to primary school provision, but there may also be cases where a contribution to secondary school provision is also required.
The provision of a new primary school to serve the development is welcome. However, this school needs to be provided at the start of the development because the existing primary schools are at capacity and cannot accommodate the early phases of development at Clotherholme. A substantial number of secondary school places will be required for the development and both secondary schools are at capacity. There needs to be an indication of how and where these places will be provided.
We are concerned that housebuilding will be too far in advance of school provision and contend that construction of the primary school and occupation of the first housing development should be simultaneous. Accordingly, the phasing of the development needs to be revisited, and if necessary, the siting of the primary school.

Ask: Provide information on where school places required by family occupation of the development will be provided and advance the opening of the primary school to coincide with occupation of the first housing development. The timing of the primary school and the details of secondary school provision should be covered by condition and or in the S106.

Sports provision
We recall the previous Neil Allan & Associates report and research for playing field options in Ripon. Withdrawal of 2013 Sites & Policies DPD has left the matter unaddressed and ignores the reference to the opportunity for utilising provision at the barracks. This is why RNP F3 protects and identifies the playing fields / "training areas" in contrast to the approach of HDLP in not identifying them.
HDLP Policy HP3 protects existing playing fields and Policy HP7 requires additional provision for allocations in the plan. The existing playing fields are also protected in the Ripon Neighbourhood Plan. In the absence of an up to date sports strategy the applicant cannot demonstrate that there is a current surplus of sports provision in the Ripon area and local evidence is to the contrary.
The Open Space Assessment accompanying the application states that 4.8 ha of the site are currently marked out as pitches. A total of 7.44 ha of replacement playing fields are proposed of which 3.54 ha are the requirement for the new development. Based on the figures there is therefore a pitch provision deficit in the planning application of at least 1 ha.
It is also considered that the replacement pitches on Laver Banks are in an unsatisfactory location. They are not well related to each other or the proposed development and the wider Ripon catchment and are likely to impact on the biodiversity of Laver Banks. Floodlighting is also not acceptable on any of the proposed pitches on Laver Banks under RNP H3 and HDLP Policy HP7, since they are in an edge of countryside location close to the AONB and the World Heritage Site. The existing playing fields on the site should therefore be retained with adequate additional provision for the new development.

Ask: Revise the masterplan and land use parameter plan to provide a deliverable and sustainable approach to playing field provision for the site and Ripon area so as to create a sports village.

Landscape character
We recognise that over half of the proposed development is presented as one or other form of green space and in principle this is to be welcomed. RNP A2 requires development proposals to demonstrate impact on landscape character (as does HDLP). RNP A3 and H3 are also relevant.
The Design Guide Mandatory Guidelines includes Green Infrastructure and Biodiversity as well as Site Boundaries and Development Edges and we comment on these below (Design Guide).
There is a potential building impact upon landscape character. The application addresses views of the proposed development from within and, as far as we can ascertain, not from beyond the site. We expect that the National Trust and Nidderdale AONB will make representations on the application. However, whilst the impact of the prescribed building height as viewed from Plumpton Lane is uncertain, we are unable to find whether there has been any assessment of visual impact from Galphay Lane which we expect to be more apparent.
We are yet to be convinced that the siting of playing fields is resolved and at Galphay Lane there should be no flood lighting.

Ask: Assess and if necessary mitigate any disproportionate visual impact of the development from the wider area.

Biodiversity
The assessment of bio-diversity net-gain is noted. This is understood to fall short of the national expectation from development. We do not have the capability to analyse how the shortfall may be addressed but it might appear that altering the type of green infrastructure would offer opportunities. Whether or not these could be sufficient is for others to advise. We submit a proviso in that Laver Banks is the location for the general vehicle highway sought to provide a continuous link between Kirkby Road and Galphay Lane. Whilst this would have a negative impact on biodiversity we believe that other opportunities exist within this extensive development and other military land to address what might be seen as a contradiction on the part of the Society's representations.

Ask: Information on how biodiversity net gain may be increased should be presented before any grant of planning permission

Sustainable Drainage
HDLP policies map shows that a part of the development is in Zone C, the most gypsum subsidence prone area. Most of the proposed development is on the Cadeby Formation, a dolomitic limestone and the major aquifer of the region. This is significant as rain and other un-contained water percolates through the porous limestone and travels down dip eastwards where under the City there are two gypsum beds to dissolve, and with strata above that can and does regularly collapse. It is crucial therefore that there is no un-contained surface water, and any storm water and sewerage are piped. This because the effects of ground instability vary considerably in their nature, scale and extent.
The application proposes SuDS. HDLP CC1 encourages SuDS unless it is proven that SuDS are not appropriate. Indeed, whilst most of the site is not underlain by gypsum, there are implications for other parts of Ripon where gypsum is present owing to the Cadeby Formation.
There is potential for groundwater flooding on and from the site and the main concern is the vital need for the SuDS system to be properly maintained to ensure non-infiltration and that any ground water flooding is removed by pipework.

Ask: The unwise encouragement for invasive SuDS requires alternative arrangements for surface water drainage to be provided and committed (by piping) before any grant of planning permission.

Renewables and Low Carbon Energy
Consideration should be given to incorporating small-scale renewable and low carbon energy generation into the development in accordance with HBC CC3.
However, the most immediate concern is the proposal for total demolition of military buildings across the estate and notably at Claro barracks. The intention to discard the energy embedded in the

construction of these substantial structures, let alone the conversion potential, is one of the most flawed elements in the redevelopment proposals and shows little if any regard for HDLP CC3.

Ask: Review the content of the development proposals to demonstrate commitment to reduce climate change impacts. This should be required by condition.

Sustainable Design
The application states that the development will meet the Future Homes Standard for 2025 onwards through the Building Regulations. This is a consultation document and is not yet a Government standard. Policy CC4 encourages development to aim for zero carbon or the highest technically feasible and viable standards and it is considered that this exemplar development should be aiming for zero carbon or at least standards above those set in the prevailing Building Regulations.
We contend that the application falls short in its commitment to sustainable design and even now should be actively promoting the use of passiv-haus. We must infer that there will be claim that this is not viable. The proposed development surely offers scale economies to fulfil a commitment at the outset.

Ask: Commit to the achievement of zero-carbon standards. This should be required by condition.

Air quality
HDLP NE1 requires mitigation measures to ensure there are no significant adverse effects where development may affect the air quality management area at High and Low Skellgate, Ripon. Air quality is assessed in the Environmental Statement, which concludes that the proposed Low Skellgate highway intervention together with the implementation of HBC's Air Quality Management Plan will result in acceptable air quality by 2025 and this will improve to 2030 and 2035.
It is considered that it is premature to come to the above conclusion, since the Low Skellgate junction improvements are still to be resolved in discussions with NYCC.

Ask: Resolve the Low Skellgate highway intervention and demonstrate satisfactory mitigation measures before any grant of planning permission.

Heritage and archaeology
The application makes little of the historical importance of the military presence in Ripon and the area. The retention of the road names is a token gesture to the military.
The military heritage of this site is not reflected in listed buildings. This does not mean that it is not important or non-existent. HDLP HP2 notes that "Heritage Assets" are defined as both designated and non-designated and specifically as regards non-designated heritage assets:
"The effect of development proposals on the significance of non-designated heritage assets will be taken into account when determining planning applications. In assessing applications, a balanced judgement shall have regard to the scale of the significance of the asset should take account of the thematic or historic values unique to the Harrogate district..."
RNP B3 sought archaeological investigation of the military occupation of the area and indeed (RNP B4) the conservation of an exemplar timber barrack block as a local heritage asset regarding the history of the Ripon Camp.
During pre-application consultations we consistently and frequently asked to have sight of this work, unfortunately, despite being assured that we would see it before the application was submitted that has not been the case. We therefore offer the following initial comments and reserve the right to comment again.
In line with the advice in the NPPF we expect the applicant to be able to demonstrate a detailed assessment of the significance of heritage assets (designated and non-designated) within the site and the effects any development will have upon them. This work is spread through Chapter 8 of the ES Volume 1 and several of the Appendices.
The map evidence provided in the Appendices is not adequate; detailed maps of the WW1 Camp exist and have been used by several local historians. The lack of this evidence does not give the Society confidence that the 'desk-based assessment' is robust or detailed enough nor that the present assessment is accurate enough to provide a proper understanding of the site's history and development nor that its significance has been properly understood.

A separate assessment is required of Laver Banks has been omitted and using the template developed by Historic England should be carried out. In particular a proper detailed map of the heritage assets on this part of the site needs to be produced - the present map 'Designated and Non-Designated Heritage Assets Plot' is really too small, unclear and unhelpful. Homes England need to be pressed to examine the area in detail with proper research and accept responsibility for 'protecting and enhancing' the heritage assets around Laver Banks.

Although some of the recommendations outlined by Historic England in the 2015 reports of Claro and Deverell Barracks have been carried out, a number have not. We would therefore expect to see further research to help determine the age of Gooseberry Grange and Double Gates Farm as we agree that there is the potential for buried archaeological remains at these sites. The ES Volume 1 indicates that an archaeological watching brief will be undertaken for the unidentified parcels of land in Laver Banks and we would expect a similar brief to be undertaken at the sites of Gooseberry Grange and Double Gates Farm.
Historic England also recommend that further research should be undertaken at the National Archives. Appendix 8-1 and the ES Volume 1 (Chapter 8) identifies a number of non-designated heritage assets but despite a number of structures being identified some are not then considered heritage assets. For example the remains of the concrete weir and bridging location in the River Laver, described as a "...remnant of the First World War Camp...being the only surviving element of the camp…". This needs to be recorded as a non-designated heritage asset.
MNY 15288 - the remains of the 'mock-up' of WW1 front line trench defences constructed at Clotherholme Farm, identified by the Yorkshire Henges and their Environs Air Photo Mapping Project (2013) which were recommended for ground or detailed LiDAR analysis with a view to formal protection – is not given due weight in the reports.
We note that Historic England's letter of 28th October 2019 states, "...we consider that the Claro Barracks and Deverell Barracks and Laver Banks have a level of heritage interest that is moderate in EIA terms...". Throughout the ES Volume 1 those heritage assets are described as "low value", this should be corrected to meet HE's assessment.
Historic England also note that "...there should be an active process of identifying opportunities to 'better reveal' the heritage significance of historic and characterful places...". We whole heartedly agree with this. The concrete weir / crossing point is proposed to be retained; we would urge that this is acknowledged to be a non-designated heritage asset and as such should be protected and enhanced. It needs to be assessed for repairs and integrated into a site-wide interpretation policy so that it and other structures can be understood by future generations. The application fails to take this advice into account, we would wish to see a comprehensive repair and interpretation strategy as part of the development.

The site is accessed through two Conservation Areas: Bishopton and the City of Ripon. The ES Report states that "...construction traffic is not anticipated to move through this area...", thereby assessing that there will be 'no impact' upon the Bishopton CA. Table 8-12 shows that the development will have 'no impact' on the City of Ripon CA, although there is no mention of this CA in the text. At present the submitted documents do not contain any proposals for construction traffic therefore it is not possible for the ES to claim that there will be 'no harm' to either CA. Both contain listed buildings close to the roads which would suffer harm from prolonged periods of construction traffic. We ask elsewhere for a construction management plan, including traffic, to be submitted as part of the application.
The Bishopton CA is also assessed as suffering a 'minor adverse' significance of effect due to the "...individual behaviours [which] may involve increased traffic through the conservation area at peak times...". This would also be the case within the Ripon City CA particularly along the Kirkby, College and Clotherholme Roads. No mitigation has been suggested for these areas.
The ES states that all buildings in Deverell Barracks will be demolished. This is contrary to the Community Action B4 of the Ripon City Neighbourhood Plan (and is further addressed in Renewables and Low Carbon Energy and Neighbourhood Hub and Local Centre). The Statement of Community Involvement has agreed that the applicant will consider options for relocation if a suitable partner, purpose and funding can be found. This needs to be acted upon.
The justification for HDLP HP2 notes with regard to non-designated heritage assets; "...The consideration of the level of significance of the asset should take account of the thematic or historic values unique to the Harrogate district...". No such consideration of the Barracks has been undertaken as part of this application. The ES Volume 1 acknowledges that Deverell Barracks are "...an important asset to the local area, unique in Ripon..")

<u>Ask</u>: Refresh the documentation to include understanding of the WW1 elements of the site and wider area and identify their significance for the proposed development. Complete the assessment of Laver Banks. Enter into agreements to carry out the archaeological investigations identified by Historic England. This needs to be the responsibility of Homes England now and not left to any developer responsible for a reserved matters application. Commit to the relocation of a barrack block from Deverell in principle and expedite identification of a suitable partner and location, not merely contingent upon the involvement of others.

Neighbourhood Hub and Local Centre

This is the core location for community provision sought by RNP.

Use classes D1 and D2 are broadly based and offer flexibility. What is not specified is the actual content of the intended community provision. There are two concerns: health and community assembly.

As regards health it must be expected that commitment is being sought to general practice and dentistry services. It is recognised that there are guidelines to identify normative deficits in provision. However, given the distance between Clotherholme and the city centre where existing medical practices are located and the Clocktower vicinity where a majority of dental practices reside, it is hardly surprising that commitment is sought for provision at Clotherholme.

There is a further dimension to health provision which relates to Ripon Hospital. Following the proposed reopening in 2021 of the new swimming bath at the refurbished leisure centre the Spa Baths will close. RNP Spa Quarter Community Action C4 addresses this. It may be that this is an opportunity for off-site engagement by the Clotherholme development parties to bring about strengthened health service provision in the city. This could offer further opportunity as regards parking enhancement (see city centre below) and cultural facilities (following).

Accommodation at Ripon Barracks has been used in the past for community events including music, theatre and other activities. In the early stages of consultation the prospect of the community receiving premises as a community asset to resurrect these activities was raised. Since then this has been ignored especially in the context of total and comprehensive demolition. The opportunity is not lost and should be retained through the details of the grant of planning permission. It is also a matter deserving inclusion in the Planning Obligation Heads of Terms. Whilst not advocating as a preferable alternative to use of existing buildings at Clotherholme, the Society suggests that facilitating the preservation and use of the soon to be vacated Spa Baths Pump Room for cultural purposes should be investigated.

<u>Ask</u>: Identify existing premises at Clotherholme for community use and transfer as a community asset to be addressed by condition or S106 Agreement. Investigate the potential for complementary investment in health service provision at Ripon Hospital and Spa Baths including cultural use of the Spa Bath Pump Room.

Sustainable transport

To satisfy HDLP TI1: Sustainable Transport, a *sustainable and improved transport system which is safe, reliable, and convenient and which seeks reductions in traffic congestion should be sought in Ripon.* The traffic and transport proposals do not satisfy the requirements of this policy and further work is required. The applicant's approach is understood to be not to leave Ripon in a worse state than it is, but not to address existing transport conditions. Given the resolve to ignore the realities of traffic between and through Ripon and its hinterland, the policy wording "improvement" strikes as extremely hollow.

It is noted that an acceptable design for the Skellgate junction has not been found and that Homes England are continuing to work with NYCC on this, it cannot therefore be concluded, as stated in the Transport Assessment, that this junction can be forecast to operate within capacity with mitigation in 2035. The application should not be approved until there is a solution for the Skellgate junction that does not increase traffic congestion, and which mitigates air pollution to an acceptable level.

We cannot urge strongly enough that there should be an additional vehicular access to the site from Galphay Lane using the existing military road, as advocated in RNP. This would reduce traffic on Clotherholme Road, Kirkby Road and in the city centre. It would provide an alternative access to the development for business users and those visiting sports provision. It would also provide a sensible route between Kirkby Road and B6265 which would have benefits for traffic between the Ripon hinterland and A1(M) and beyond. This should be co-ordinated with a review of traffic measures along

the length of B6265 between Galphay Lane and A61. This would have regard to the Low Skellgate junction incomplete proposal (see Air Quality).
We recognise the approach to sustainable transport within the proposed development (and the pressure to adopt what are metropolitan solutions) but contend that the applicant has demonstrably failed to understand the vehicle movement requirements of a market town and rural area. The out and out rejection of this option by the applicant and the highway authority is one of the least attractive aspects of this application.
A development of 1300 dwellings on the edge of Ripon will have a direct and significant impact on city centre parking provision. The applicant should carry out a parking assessment and if appropriate it would be reasonable to require a contribution to improve provision. This is considered further in the "City Centre" topic below.

Ask: The applicant is requested to recognise the nature of vehicle movements in Ripon and its hinterland being a market town in an extensive rural area. The approach to roads within Clotherholme, between Clotherholme and the city centre and across to A61, particularly in relation to the Skellgate junction, the benefits of access to Galphay Lane using the existing military road and an assessment of the impact of the site on city centre parking, needs to be reviewed before any grant of planning permission. Revise the masterplan to provide a deliverable and sustainable transport solution, secured by appropriate conditions and provisions in the S106 Agreement.

Traffic regulation
The Framework Travel Plan (FTP) identifies substantial lengths of highway where on-site parking will be removed. This is an important matter. Residents, community facilities and businesses will be affected by this outcome of the development proposals. Traffic regulation is a matter for NYCC as highway authority and developer responsibilities and financial contributions are arranged through agreements under other legislation. This is unacceptable and for transparency a full schedule of traffic management measures needs to be provided as part of this application to avoid any suspicion of opacity.

Ask: provide clear documentation as part of the application, advertise its existence and consider representations received before any grant of planning permission.

Parking displacement
Provision of and responsibility for off-street parking in replacement for that to be displaced by the introduction of traffic regulation orders needs be required before any grant of planning permission. This is a land-use implication of the application and should therefore be addressed.

Ask: Respond to how this impact of the proposed development may be addressed.

Masterplan
The masterplan has merit in its approach to building cells, green and blue corridors and location of the neighbourhood hub and local centre. The hierarchy of routes is also understood. We can recognise the approach from other masterplans in preparation and in use at urban extensions and garden villages as well as major urban regeneration projects (such as York Central).
The problem is that a masterplan is only as good as its strategic context and at Clotherholme there are too many flaws at this moment to be able to contend that the masterplan deserves our support. These flaws are the scale of the housing target, the inflexibility of the phasing, the lack of co-ordination of sport provision (and its content), a lack of flexibility with existing buildings and the failure of the highway network to provide the continuous highway between Kirkby Road and Galphay Lane. If these had been respected at the outset we are confident that a convincing masterplan could have been prepared. On the evidence of what has prepared to date it should not be too late to do so.

On a specific level, we are not satisfied that the understanding of the military estate has been used convincingly in the masterplan. We are aware that Historic England went to lengths to guide the applicant in how to approach this. In the Historic England 2015 Rapid Survey Assessment recommendations include:

"….that to inform master planning a characterisation study should be considered to develop a deeper understanding of the built heritage of Deverell and Claro Barracks. This might address functional zones within the barracks and the functional relationships between structures. Consideration should also be given to the barracks' layout, the spacing of buildings, the use of building materials and planting schemes….".
The letter from HE on October 28th 2019 says:
"We wish to highlight that the assessment of the significance of the heritage assets, particularly those on the site that will be directly affected, should be identified and used to inform the form, layout, character and appearance of the new development. This is in order to ensure that the historic interest of the site remains legible in the new development, so that it can be interpreted and understood by future generations. This active process is encouraged in paragraph 200 of the NPPF and paras 127 c) and d) and in 131 in Chapter 12..."

The ES Volume 1 in assessing the significance of the Barracks says:
Deverell - *"...Despite not being of national significance, the barracks retains the character of a 1940s Militia camp and is an important asset to the local area, unique in Ripon. The heritage value is expressed in its surviving buildings and layout around one of its original two parade squares...The arrangement of the buildings reflects functional zoning, and their group value and historic integrity has clear architectural and historic value...Deverell therefore forms part of the 20th and early-21st century history of Ripon as a settlement, and forms part of the communal identity, not only of the military personnel that were and are based there, but also of the local inhabitants of the town..."*

It is argued that even though all these buildings are to be demolished; *"...Part of their value will be retained through retention of elements of the barracks' road network and the retention of the outline of the parade square as a building plot. These place-making features will allow something of the historic significance of the site to be easily readable in the new development…"*

We consider the response as prepared and presented within the ES to be complacent. Ascribing road layout as a sufficient reflection of the barracks' layout is simplistic (especially when the indicative housing layout from the design guide is considered. There is no apparent attempt at using parade ground dimensions to determine layout, building type, scale of proposed development or neighbourhood open space and public realm.

This is at the very least disappointing.

Ask: Prepare an alternative masterplan based on the approach set out in the Ripon Neighbourhood Plan and incorporating more convincingly the guidance from Historic England.

Design Guide
We recognise that the Design Guide is one of the most important parts of the application and carries more detail of the approach proposed to be taken by the development in previous topics of this representation, notably housing mix and density, landscape character, heritage and archaeology, sustainable transport and masterplan. Accordingly, we do welcome the design guide but with certain reservations.
The principal concern is with the status of the Design Guide as a tool for delivery of the reserved matters. It is a 'guide' yet contains 'mandatory' guidelines. We are concerned that the guidelines, having taken into account our reservations, should indeed be mandatory upon developers responsible for delivery of the reserved matters approvals. You will appreciate that as a civic society we share the national concerns of our movement regarding the reliance that can be placed upon the commitment of developers. We recognise as well that as time passes what might once have been considered a strength of the design guide will come under pressure for greater flexibility.
We have declared at the outset that some of our members have had direct involvement on urban and landscape design with Homes England, facilitated by the Ripon Steering Group. Unfortunately this did not extend to having sight of the emerging design guide. Our comments follow the structure of the document.
2.1
SU1 Reference to discussion with the local community needs a structure. (See Future engagement below.)

SU3 We understand that there is a significant cost penalty in retro-fitting dwellings with new technologies to reduce energy requirements and urge that best specification at the time of construction is required as an absolute. This meets our comments on zero-carbon.
2.2
2.2.2 We accept the analysis of the existing character subject to our comments in Heritage & Archaeology (above).
RF8. We note retention of the river crossing over the River Laver.
2.3
We accept the general movement hierarchy but you will understand that our stance on opening of the military route between Kirkby Lane and Galphay Lane as a through route for general vehicle use should be expressed as a typology. We see no reason why the level of detail and consideration given to road safety and other modes along this corridor should not be achieved given the space available.
We are concerned that zone width for mature tree cover may be too narrow to allow tree growth to maturity. Highway authorities are sometimes resistant to highway tree planting. Given the liaison with the Highway Authority during the preparation of the application we expect that our general concern will be unfounded at Clotherholme.
2.5
BE2/3 We suggest that the proposed planting belt should be significantly deeper than the 10m shown.
BE4 There should be reference to the riparian interface.
BE9/10 We strongly support all dwellings fronting onto the countryside. In the event that this is lost in a reserved matters application it will be important for any rear garden to have sufficient depth to allow tree planting and accommodate a canopy for tree growth to maturity.
2.6
The approach to building height is understood but an analysis of views into the site should be provided to assess visual impact.
2.7
The colour coding of the key and plan is confusing. This needs to be corrected
BT2 There does not appear to be any retention of an open space / public realm to resonate the former location of the parade grounds. The illustration of the parade ground block (Figure 121) does not comply with BT2.2 to present a sufficient strong block perimeter. A different building type could be considered.
BT6 Is a ‘rural courtyard block’ a relevant typology? The regimented grid across the site tends to lose the incremental and informal character of such ‘courtyard’. If there is a wish for a ‘rural’ typology would this not be better as a ‘farmstead’ and located elsewhere?
2.9
We welcome the attention to military heritage but suggest it should be separated from public realm.
2.10
We comment on SuDS elsewhere. This is a comprehensive approach to ground level measures. Our concerns relate to avoidance of below ground intervention.
2.11
Ripon has an eclectic range of architectural style and we are pleased to support AC1.2. The response to military character is interesting and we will look forward with interest to see how this emerges in due course. The use of ‘contemporary’ is perhaps best avoided (because when built it will be contemporary regardless of its characteristics) but there needs to be a place for ‘innovative’ architecture. The requirement for self-build and custom-build dwellings is relevant to this, especially owing to the enthusiasm of self-builders. We do not read how such singular dwellings will be located within the development.
There is much in this section that we are comfortable with. The devil will be in the detail of ensuring that reserved matters applications and the submission of later variations deliver the expectations. Some illustrations are rather poor given the visual quality of much of the document (e.g. see Figure 172).
2.12
This is a sound and sensible approach.
We recognise the place for modern-methods of construction. Given the high proportion of brick building in Ripon we would not wish the advantages of these to be lost to the familiar.
It is a pity that Ripon has failed to provide precedent images.

<u>Ask</u>: The Design Guide needs to be agreed through an appropriately worded and enforceable condition. A community engagement process on design should be committed to by Homes England.

Phasing
There are key elements of the proposed development that are required to be integrated including the school, MUGA, sports fields, neighbourhood hub, demolition programme and construction traffic. There is no information on what alternative phasing have been considered or how slippage will be accommodated. The phasing for delivery of the new primary school is a concern for provision of school places and should be reconsidered along with the expected timetable for occupation of the first dwellings. The phasing of the demolition programmed should be reviewed to justify premature loss of existing buildings and potential for conversion and reuse as housing and job markets evolve.

Ask: Review the robustness and resilience of the phasing programme.

Construction management
There is highly likely to be continuous construction of the development for well beyond a decade. In addition to on-site working there will be substantial construction traffic. This will make an inconvenient and arguably unacceptable impact upon the amenity of residents in west Ripon. There does not appear to be any information on the scale, type and management of construction and traffic in the application documents. It may be that the existing network of military roads should be used to avoid traffic on existing public highways. Information needs to be provided and explicitly consulted upon in the neighbourhood to gain public support. Such construction management arrangements need to be subject of appropriate specification within the grant of any planning permission.

Ask: Obtain information on construction arrangements including traffic, consult and consider representations received before any grant of planning permission.

City centre
RNP supports the provision of off-site movement improvements in policies C1 (Spa Quarter), C4 Spa Quarter and C5 Market Place, Westgate and west of Market Place Improvements. Disappointingly the measures proposed in the FTP neither go far enough to meet the expectation of RNP nor the design and place-making expectations of this project. Given the opportunities for engagement facilitated by the Ripon Steering Group this is a lost opportunity.
An example of measures to improve walking is the proposal for pedestrian facilities on Park Street where RNP seeks the integration of Spa Gardens and Spa Park, reuse of the Spa Baths Pump Room and sustainable transport measures. It is to be urged that a comprehensive and co-ordinated approach can be taken to the Park Street public realm.
Cycling measures between Clotherholme and the city centre are underwhelming. There is more to be achieved along this route. Kirkby Road appears to be ignored between College Road and Blossomgate. It is all too apparent that traffic measures focus on junctions and not the narrow footways and carriageways of Ripon's historic city centre streets. (The proposed intervention on Westgate is a welcome exception in line with RNP.)
The FTP pays some regard to the connections between Clotherholme and the city centre. Of particular import is the diagram showing walking distance between the development and the city centre. This reveals that on best standards the distance is beyond normal and reasonable distance for walkers. This may be adequate from edge to edge but not as soon as any distance into and across the development or beyond the Market Place is taken into account.
Accordingly, there will be a demand for parking from Clotherholme car users unwilling or unable to walk to the city centre. RNP C1 addresses parking improvements. However, there remains an opportunity to rationalise and extend parking at Firby Lane in the Spa Quarter by a partnership between the health services (see Neighbourhood Hub and Local Centre above), HBC and NYCC (as owner of a substantial property long derelict).

Ask: There should be a movement strategy for Ripon city centre integrating the city as a whole including Clotherholme against which the off-site impacts of the proposed development can be thoroughly examined. This should include a parking strategy to assess future trends and requirements. Ideally this should be before the grant of planning permission but otherwise required as a condition or included within the Planning Obligations Heads of Terms.
The measures proposed for Westgate and Park Street should be reconsidered in a public realm project coordinated with the RNP Spa Quarter Community Action including parking.

Planning Obligation
The Heads of Terms set out in the application are those that are to be expected from a normal development as regards open space management, school places and highway works. They bear little specific reference to the needs of the new community to be created or to the wider impacts upon Ripon.
There is no reference to affordable housing.
RNP Community Action J1 seeks contributions towards a list of complementary projects. Those that appear to be relevant to this application would be:

Car Park Improvement and Capacity Study
Market Place, Westgate and West of Market Place Environmental Improvement Action Plan
Spa Gardens and Spa Park Environmental Improvement Action Plan
Ripon Sports Development Strategy
Ripon Integrated Transport Strategy
Park and Ride Feasibility and Viability Study
Public Paths Protection and Improvement Action Plan
Cycling Strategy and Action Plan
Bus Connectivity Improvement Plan
Riverbank Habitat Improvement and Management Plan
Local List of Undesignated Heritage Assets
Public Art Strategy and Delivery Plan.

Accordingly, consideration of the Heads of Terms should have regard to this listing as a means of assessing the true impact of the proposed development upon Ripon. Additionally, the following should be added to the Heads of Terms:

not only contributions to school places but where they would be made;
not only contribution to bus services but the responsibility for their procurement;
not only contribution to walking/cycling routes between Clotherholme and the city centre but also connections to Galphay Lane and beyond;
archaeological investigations as sought by Historic England;
provision of building(s) as community assets, their transfer and endowment;
heritage measures for the preservation and conservation of military artefacts and structures

Ask: Consideration to be given to the additional measures within the Heads of Terms for Planning Obligations

Reserved matters
The application needs to show clearly where these will be, their likely content and timing. It is important to know which organisation will be responsibility for submission. A consultation and engagement process is essential for these applications to have credibility both now and at the time of preparation and submission.

Ask: An additional parameter plan should be included in the application documents that shows the areas to be subject of individual reserved matters applications. A document should form part of this application setting out the location, content, timing, responsibility for preparation and submission, consultation and engagement for the reserved matters applications.

Future engagement
The creation of a sustainable community at Clotherholme should be facilitated by Homes England from the outset. A key element of this will be community involvement. A long-term community management strategy could take the form of the establishment of a Community Trust with responsibilities including for example, community engagement, holding and management of assets transferred (including property), maintenance of open spaces, playing fields and community facilities and activities.
Such arrangements could also advise and liaise on reserved matters applications.

Ask: That commitment to enter into measures and capability for community involvement is contained within the Planning Obligations Head of Terms or such other place at the time of grant of planning permission.

Summary of Asks	
Housing mix and density	There needs to be an explicit monitoring arrangement for Clotherholme that regularly assesses the suitability and impact of housing provision and, if justified, reduces the dwelling yield from the development. The outline consent should also be flexible, up to 1300 dwellings, and the mix should be reassessed at each reserved matters stage, based on the latest HEDNA. This process should have community engagement.
Self-build and custom-build housing	A specific delivery plan for self-build and custom build housing is needed and should be covered by a condition.
Employment land and jobs	There needs to be an explicit monitoring arrangement for job creation and economic activity at Clotherholme that regularly assesses the suitability and impact of employment provision. The amount of employment land/number of jobs should be flexible with 2 ha as a minimum. An up to date employment land study should be required by condition and the overall site mix may need to be altered as a result. If justified, the dwelling yield from the development should be reduced in favour of provision of employment and business premises. This process should have community engagement.
School places	Provide information on where school places required by family occupation of the development will be provided and advance the opening of the primary school to coincide with occupation of the first housing development. The timing of the primary school and the details of secondary school provision should be covered by condition and or in the S106.
Sports provision	Revise the masterplan and land use parameter plan to provide a deliverable and sustainable approach to playing field provision for the site and Ripon area so as to create a sports village.
Landscape character	Assess and if necessary mitigate any disproportionate visual impact of the development from the wider area.
Biodiversity	Information on how biodiversity net gain may be increased should be presented before any grant of planning permission.
Sustainable drainage	The unwise encouragement for invasive SuDS requires alternative arrangements for surface water drainage to be provided and committed (by piping) before any grant of planning permission.
Renewables and low carbon energy	Review the content of the development proposals to demonstrate commitment to reduce climate change impacts. This should be required by condition.
Sustainable design	Commit to the achievement of zero-carbon standards/ This should be required by condition.
Air quality	Resolve the Low Skellgate highway intervention and demonstrate satisfactory mitigation measures before any grant of planning permission.

Heritage & Archaeology	Refresh the documentation to include understanding of the WW1 elements of the site and wider area and identify their significance for the proposed development. Complete the assessment of Laver Banks. Enter into agreements to carry out the archaeological investigations identified by Historic England. This needs to be the responsibility of Homes England now and not left to any developer responsible for a reserved matters application. Commit to the relocation of a barrack block from Deverell in principle and expedite identification of a suitable partner and location, not merely contingent upon the involvement of others.
Neighbourhood hub and local centre	Identify existing premises at Clotherholme for community use and transfer as a community asset to be addressed by condition or S106 Agreement. Investigate the potential for complementary investment in health service provision at Ripon Hospital and Spa Baths including cultural use of the Spa Bath Pump Room.
Design guide	The Design Guide needs to be agreed through an appropriately worded and enforceable condition. A community engagement process on design should be committed to by Homes England.
Sustainable transport	The applicant is requested to recognise the nature of vehicle movements in Ripon and its hinterland being a market town in an extensive rural area. The approach to roads within Clotherholme, between Clotherholme and the city centre and across to A61, particularly in relation to the Skellgate junction, the benefits of access to Galphay Lane using the existing military road and an assessment of the impact of the site on city centre parking, needs to be reviewed before any grant of planning permission. Revise the masterplan to provide a deliverable and sustainable transport solution, secured by appropriate conditions and provisions in the S106 Agreement.
Traffic regulation	Provide clear documentation as part of the application, advertise its existence and consider representations received before any grant of planning permission which should be secured by appropriate conditions and provisions in the S106 Agreement.
Parking displacement	Respond to how this impact of the proposed development may be addressed. This should be secured by appropriate conditions.
Masterplan	Prepare an alternative masterplan based on the approach set out in the Ripon Neighbourhood Plan and incorporating more convincingly the guidance from Historic England.
Phasing	Review the robustness and resilience of the phasing programme.
Construction management	Obtain information on construction arrangements including traffic, consult and consider representations received before any grant of planning permission and secured by condition.

City centre	There should be a movement strategy for Ripon city centre integrating the city as a whole including Clotherholme against which the off-site impacts of the proposed development can be thoroughly examined. This should include a parking strategy to assess future trends and requirements. Ideally this should be before the grant of planning permission but otherwise required as a condition or included within the Planning Obligations Heads of Terms. The measures proposed for Westgate and Park Street should be reconsidered in a public realm project coordinated with the RNP Spa Quarter Community Action including parking.
Heads of Terms of Planning Obligations	Consideration to be given to the additional measures within the Heads of Terms for Planning Obligations
Reserved matters	An additional parameter plan should be included in the application documents that shows the areas to be subject of individual reserved matters applications. A document should form part of this application setting out the location, content, timing, responsibility for preparation and submission, consultation and engagement for the reserved matters applications.
Future Engagement	That commitment to enter into measures and capability for community involvement is contained within the Planning Obligations Head of Terms or such other place at the time of grant of planning permission.

Conclusion
We repeat that this is a complex application and the consultation period is extremely limiting in the opportunity to consider its content.
Clotherholme deserves to be exemplary for being a successful merging of a contemporary urban extension with a historic city and market town in an attractive part of rural England. This legacy is worth seeking. The Society trusts that these representations are helpful to achieving it. If so then the Society looks forward to being able to give the application its support in due course.

Yours faithfully,

Christopher Hughes

Chairman
Ripon Civic Society