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F.a.o: Mr A Hough

Place-shaping and Economic Growth
Harrogate Borough Council
P.O Box 787
Harrogate HG1 9RW

17 February 2022

Dear Sirs

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

The Society wrote to you on 9th October 2020 in response to the Council's receipt of this application. We write now in response to the further consultation on the submission of supplementary documents.

We note that that the supplementary documents relate principally to transport and traffic concerns to satisfy the requirements of the North Yorkshire County Council Highway Authority and also following the intervention of the former Highways England (now National Highways) and the concomitant impact upon associated documentation. Other documents being consulted on are the Development Specification and Framework, the updated Design Guide, Parameter plans and a range of supporting documents

You will recall that our original representation was expressed as a set of 'asks' both with explanation and in a summary table. The supplementary documents relate to several of these matters but by no means all. Accordingly, our whole list still stands and should be addressed as such in the report to the Planning Committee. Further consideration has been given to several matters and this letter constitutes the Society's updated and further representation. We are unaware of attention being paid to our 'asks' nor to Community Actions B3 and B4 of the Ripon Neighbourhood Plan (RNP). We shall expect to see each addressed explicitly in the report to Planning Committee.

This is an outline planning application for a mixed-use development with access approved. We note that approval is sought for the Development Specification and Framework, the Design Guide, the set of parameter plans (including demolition plan) and the off-site road junction plans. The Planning Obligations – Heads of Terms are provided for information. Implementation would follow in light of the conditions attached and would be by a series of reserved matters over time. We have had regard to those documents submitted to you for approval, namely the Development Specification and Framework, the Design Guide and the Drawings for Approval. We suggest that an outline planning permission would be stronger if more content was contained within it drawn from supporting documentation. We have suggested certain matters where a condition would be appropriate.

For clarity, those 'asks' where we have no further representation are:
- housing mix and density
- self-build and custom-build housing
- employment land and jobs
- school places
- landscape character
- neighbourhood hub and local centre

- traffic regulation
- parking displacement
- construction management

Our further representations concern:
- heritage and archaeology (see also separate letter)
- sports provision
- biodiversity
- sustainable drainage
- renewables and low carbon energy
- sustainable design
- sustainable transport (including air quality and city centre)
- health care provision (not mentioned in previous representation)
- Design Guide
- reserved matters (including phasing and masterplan)
- heads of terms of planning obligations
- future engagement

Heritage and archaeology

Our research carried out over recent months has revealed important additional evidence of significant heritage assets beyond that contained in our initial representation that merits being given substantial weight in determination of the application. In connection with this 'ask' we would seek identification of protection areas in Laver Banks on the Land Use Parameter Plan or at the very least explicit flexibility in the location and nature of the different uses. This matter is addressed in separate correspondence to you of same date.

We have seen Historic England's letter to you dated 15 February on Public Access. They state … *'We consider that the full extent of the significance of the site has yet to be articulated in any heritage assessment produced to date.*
Consequently, we would urge you to undertake additional research to uncover the significance of the heritage assets on site.'
We believe this to be endorsement of our research and original 'ask' for completion of the assessment of Laver Banks.

Ask: See separate letter and attachment.

Sports provision

We note from the covering letter that the consultation includes an Open Space Assessment dated December 2021, however, we cannot find this, nor is there as yet a published version of the Playing Pitch Strategy (Stage D), without which we are unable to understand how sports provision will be accommodated. We also note the correspondence on Public Access from Sport England and selected sports bodies. We are aware that the original submission refers to a positive balance of playing pitches of 3.9ha, the location of pitches being indicated on the Green Infrastructure Parameter Plan, which is a document for approval at outline stage.

We are aware of discussions between Homes England and the Ripon Football Club and understand that their requirements should be able to be accommodated within areas indicated on the above Parameter Plan. However, there is no reference to a wider range of sports provision such as that sought by the Ripon Sports Consortium. We are therefore not clear how other sporting needs will be accommodated or whether there will be a requirement for off-site provision when the Playing Pitch Strategy is published. We must seek confirmation at the outline planning stage that there will be no impact from sports provision on the military heritage assets now identified within Laver Banks.

Ask: publish the revised open space assessment. The agreed level of sports provision should provide for the wider needs of the Ripon area in accordance with the forthcoming Open Space Assessment. The location of facilities at Laver Banks should not impact on the military assets which should be protected. There should be sufficient flexibility in the outline consent to allow for off-site provision if necessary.

Sustainable transport

(This includes matters raised regarding air quality and city centre.)
We have done our best to follow the approach to transport and traffic contained in the plethora of documents now submitted. We have some appreciation of the proposals being prepared in the Ripon Renewal project promoted by the Council. Generally, we have to accept the highway strategy now adopted but have some concerns about the details. It would also be helpful to understanding of the wider implications for Ripon if the Access and Movement Parameter Plan included the off-site junction and traffic management proposals.

We do not have comments with regard to on-site provision. These appear to be following current practice for developments of this size and location and the Design Guide allocates sufficient space for the road hierarchy to be provided.

We acknowledge the concept of a 'West Ripon Active Travel Zone' and it is with off-site traffic measures that we comment.

RNP did not have competence to address highway matters but we are pleased to note that several of the one-way interventions now proposed are as would have come forward (for example, Blossomgate). The exception is Park Street where RNP alludes to reducing the impact of traffic through seeking better integration of Spa Gardens and Spa Park. We note that a pelican crossing is proposed across Park Street outside the Spa Baths. This lacks ambition and we would ask that a longer shared space is created that will integrate both open spaces, the Spa Baths and doctors' surgeries in a new public realm for the city centre Spa Quarter.

Clotherholme Road is the principal (but not only) route between the development and the city centre. This route is being expected to do too much. Walking, cycling, local vehicle traffic, school safety, public transport and shop deliveries at times will result in user conflicts. We support the active travel approach but are unconvinced that the proposal for this corridor is sufficiently ambitious, including off-line options. We suggest that further investigation of cycle routes is needed, especially into the city centre.

We understand from the highway authority that the proposals do not place any constraint upon prospective traffic measures to the east of the city centre. We note that the Ripon Renewal project may contain a proposal for Firby Lane and its junction with Somerset Row. It is a pity if this cannot be identified here as we would not wish for this to be prevented by the applications's off-site proposals.

Our earlier concerns about the Air Quality Management Area is addressed by the reduction in standing traffic and removal of the right turn into Lower Skellgate as well as the gradual introduction of electric vehicles. This satisfies our earlier 'ask'.

We also have some concerns about the proposed pedestrian and cycle route through Laver Banks, as indicated on the revised Access and Movement Parameter Plan, We understand that, whilst there will be access for cycles through to Galphay Lane, this will not be signed due to safety concerns. We consider that the application should address any safety concerns and there should be consideration of links to the wider cycle network.

Ask: Access and movement parameter plan to show off-site proposals. Revisit the detailed designs at Park Street and Clotherholme Road to address the above concerns. Address the off-site safety issues for cyclists on Galphay Road and linkages to the wider cycling network by condition or the S106.

<u>Biodiversity</u>
The Sustainability Statement of January 2022 states that the masterplan aims to deliver a net gain in biodiversity. Mandatory biodiversity net gain of a minimum of 10% is set out in the Environment Act 2021. From our meetings with Homes England, we understand that if the development does not meet the minimum standard there may need to be off-site compensation. We note from Public Access that the current estimation of biodiversity net-gain is 4.9%. This should be recognised and they position clarified before the decision.

Ask: Ensure there is a biodiversity net gain of at least 10%. If this cannot be achieved on-site, there should be off-site compensation required by condition.

Sustainable Drainage
We outlined the need in Ripon for alternative arrangements to SuDS for surface water drainage in our original consultation response. We note the reference in the Development Specification and Framework to alternatives to SuDS where ground conditions are unsuitable and ask that this is included as a condition of consent.

Ask: Ensure that there is a condition at outline stage which states the above.

Renewables and Low Carbon Energy
We do not consider that the wording in the Development Specification and Framework is sufficiently strong in that the reduction in carbon dioxide emissions is left to the reserved matters applications. There needs to be a strong commitment at the outline stage.

Ask: Ensure that there is a condition at outline stage requiring a strong commitment to the reduction in carbon dioxide emissions in the reserved matters applications.

Sustainable Design
We maintain our request in our original consultation response for a condition committing the development to the achievement of zero-carbon standards. There is still no commitment in the latest documents to anything beyond the relevant Building Control requirements. Given the timeframe for the development the Design Guide should contain guidelines on what will be expected from housebuilding especially in those elements that can be unsightly such as PV panels.

Ask: Ensure that there is a condition at outline stage committing the development to the achievement of zero-carbon standards and incorporate design implications within the Design Guide.

Health care provision
There is concern in Ripon about current provision of primary care facilities. The application appears to overlook health care provision. Whether or not this arises from differences of interpretation in data is not clear. However, using a comparison of school place provision and inclusion within s106 heads of terms, we would expect that a similar approach could be agreed for health care, especially as we understand that this has a high profile within the Ripon Renewal project.

Ask: The S106 heads of terms should include a requirement for health care provision based on a calculation of per capita need arising from the development.

Design Guide
We have not commented on the Design Guide previously but wish to do so now. The Design Guide is for approval. It is an extensive document supported by the Design and Access Statement and the Ripon Barracks Character Study. It contains 'mandatory guidelines' applied to character areas. It is supported by the illustrative masterplan. We are encouraged to accept the guide at the level of its general approach yet it is in the detail that we wish to make some points before approval is given.

As mentioned in our military heritage letter, we ask for amendments to the wording and content of the Laver Banks character area to include heritage interest as being equivalent to ecological interest. The caption to fig.15 - *bridge structures to be replaced* i.e. the Heavy Girder Bridge - should be deleted. We would welcome discussion to develop a sketch design for Laver Banks that incorporates military heritage assets. Fig 49 on p33 of the guide should be revised to show the assets. However p144 states *The Bailey Bridge provides a crossing point over the river, linking the settlement to recreation areas south of the Laver and connecting to recreational routes beyond the site*. This is a welcome inclusion of military heritage within a character area.

A further military related matter is the Parade Ground Block typology BT2. The Deverell proposal is more successful for its regularity. The extent of the Claro example appears inconsistent

between figures. However, the precedent image of the parade ground at Trinity, London p133 is not what is proposed for either Ripon barracks parade grounds. Here it is the parade ground boundary alone which is to be indicated by dwellings; there is no interior open space. Perhaps it should be possible to require an internal public open space that identifies the centre of the former parade ground as a key point / place-making principle. This would appear possible at Deverell p115. It needs to be at Claro, where the typology currently appears to be somewhat weak.

The precedent images are interesting and deserve inclusion in the Design Guide for two reasons: firstly they reveal the general lack of design quality in recent Ripon residential development; secondly they are a valuable warning against the poverty of housing design that seeks slavishly to demonstrate 'local distinctiveness' in this area.

We welcome the attention to public realm and military heritage but are disappointed in the extent of ambition with public art and the opportunity to recognise the legibility offered by military assets, not only the bridges (especially the Demolition bridge prominent from the site entrance along Clotherholme Road) but also buildings such as the Gymnasium which are to be demolished. (The Design Guide Addendum is instructive at pp182/3 in prospectively questioning the inevitability of the demolition strategy at this time. The buildings named in Claro should be removed from the demolition plan at this time.)

We are careful not to prescribe a preferred architectural character and consider that the mandatory guideline 2.11 is well thought through and should indeed promote (AC1) *a contemporary and distinctive architecture* and (AC2) *respond to the site's military and other character areas.* However, our concern for the resilience of the Design Guide (see below - Reserved Matters) is particularly generated by 2.11. A comment is that fig. 165, although understood, is likely to encourage a 'race to the bottom' in the minds of some house-builders.

Ask: review the interpretation of typology BT2 on the masterplan and relevant character areas in the Design Guide. Devise measures and practices that will provide resilience for the Design Guide over time.

<u>Reserved matters</u>
(This includes matters raised regarding phasing and masterplan.)
We should like some indication within an outline planning permission of the location of reserved matters applications. While the precise definition of land parcels for eventual disposal may well depend upon their release from military occupation, there is clear anticipation of what this would be from the phasing plan. The content of each individual reserved matters application will include common items. This could be specified now.

Green infrastructure, bio-diversity, sports pitches and military heritage conservation will include elements that require planning permission. Clarity on how far this would be addressed in reserved matters applications should be provided including responsibility for each submission. We understand that the phasing plan and masterplan are supporting documents for illustrative purposes only. They appear to carry greater weight and deserve to be given some recognition.

We are concerned for the resilience of the Design Guide, The development is expected to take over a decade to be implemented during which time the Design Guide candidly will be 'stress tested'. There may be positive aspects to this timescale, perhaps more mandatory sustainable design standards. Regrettably we are anxious that this period should result in remorseless attrition from house builders. Accordingly, we would support firm measures to protect and enforce design quality throughout the procurement process. Otherwise we fear that the high quality design expectations for Clotherholme will result inevitably in disappointment.

We understand the flexibility built into development of the Neighbourhood Hub at this time but are intrigued by the purpose of the illustration shown on p129 as regards the land south of Clotherholme Road. Given the military heritage assets, ecological interest and the reserved position for playing pitches and the depicted sports changing rooms this is a confusing part of the guide.

Ask: More detail at outline stage for the proposed location of reserved matters applications. The phasing plan and the masterplan should be given some weight in the outline consent.

Heads of terms of planning obligations

There is no update to this on the website and we would ask for the opportunity to comment on the latest version prior to the application being taken to committee. It would also be helpful to have an indication of the matters to be covered by planning obligation at reserved matters stage.

Ask: The S106 heads of terms should include the matters we have indicated in this response and our accompanying letter on heritage assets. There should be opportunity to comment on the latest version prior to committee.

Future engagement

The substantial investment in green infrastructure is welcome but raises the overall question of stewardship of Clotherholme and there may be other items that are best managed collectively by the local community. The suggestion of third party ownership and management for military heritage assets is a specific matter but one which should not stand in isolation from this overall stewardship. It would be extremely helpful for an understanding of stewardship to be contained within the decision, perhaps within the s106 agreement heads of terms.

Establishment of a Clotherholme Design Panel to maintain commitment to the Design Guide from the outset is a mechanism that we recommend can be committed at the online stage; the involvement of independent practitioners and the local community being an essential element to provide confidence and 'ownership'.

Ask: include the approach to stewardship and design scrutiny at outline stage and welcome the opportunity to be engaged in emerging arrangements

In conclusion, we consider that further action is needed to make the development acceptable, as indicated in our asks in both our original representation and as identified above. We are especially concerned about the need for protection of significant heritage assets and as set out in our letter on heritage and archaeology. There are unresolved sports needs and we have detailed concerns in relation to sustainable transport.

We request that you give serious consideration to the issues we raise in determining the application. Please let me know if there are matters where we can be of assistance.

Yours faithfully,

Christopher Hughes

Chairman, Ripon Civic Society