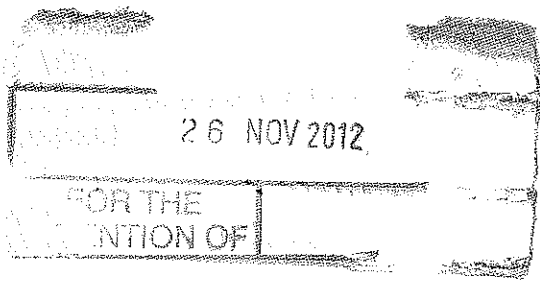


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Ribble Valley Borough Council  
Development Control  
Council Offices Church Walk  
Clitheroe  
Lancashire  
BB7 2RA

**Our ref:** NO/2012/104499/01-L01  
**Your ref:** 3/2012/0942  
**Date:** 26 November 2012

Dear Sir/Madam

**1,040 RESIDENTIAL DWELLINGS COMPRISING 728 MARKET HOMES, 312 AFFORDABLE HOMES, 156 FOR ELDERLY PEOPLE (I.E. OVER 55 YEARS OF AGE); 0.8HA TO BE RESERVED FOR RETIREMENT LIVING WITHIN THE TOTAL OF 1040 HOMES; 0.5 HA FOR LOCAL RETAIL, SERVICE AND COMMUNITY FACILITIES (CLASSES A1 TO A4, B1 AND D1); PUBLIC OPEN SPACE INCLUDING GREEN CORRIDORS AND AREAS FOR TREE PLANTING AND LANDSCAPING; IMPROVED (ROUNDAABOUT) JUNCTION BETWEEN PENDLE ROAD THE A59; NEW VEHICULAR, PEDESTRIAN AND CYCLE ACCESSES ONTO PENDLE ROAD AND LITTLEMOOR; NEW PEDESTRIAN AND CYCLE ACCESSES ONTO WORSTON OLD ROAD; TEMPORARY VEHICULAR ACCESS ONTO WORSTON OLD ROAD; NEW PEDESTRIAN AND CYCLE ACCESS FROM THE END OF SHAYS DRIVE; ROADS, SEWERS, FOOTPATHS, CYCLEWAYS, SERVICES AND INFRASTRUCTURE INCLUDING A SUSTAINABLE URBAN DRAINAGE SYSTEM, NEW SERVICES SUCH AS GAS, ELECTRICITY, WATER AND TELECOMMUNICATIONS  
LAND AT HIGHER STANDEN FARM AND PART LITTLEMOOR FARM,  
CLITHEROE**

Thank you for referring the above application which was received on 26 October 2012.

The application is accompanied by the following Environmental Statement:-

- Environmental Statement for Land South of Clitheroe by AMEC Environment & Infrastructure Ltd (October 2012) for Trustees of the Standen Estate

We have no objection in principle to the proposed development subject to the inclusion of conditions which meet the following requirements:-

**Flood Risk**

Environment Agency  
PO Box 519, South Preston, Lancashire, PR5 8GD.  
Customer services line: 03708 506 506  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)  
Cont/d..

Chapter 6 of the Environmental Statement (ES) considers the risk of flooding. The site is predominantly located within Flood Zone 1, with a small part of the site located in Flood Zone 3 and 2 adjacent to Pendleton Brook. To ensure the proposed development will not be at risk of flooding or exacerbate flood risk elsewhere, it is proposed to

- restrict areas identified as Flood Zone 3 & 2 to water compatible uses, i.e. amenity open space areas; and
- attenuate surface water run-off to existing Greenfield rates through the use of sustainable drainage systems

We are satisfied that the proposed measures will ensure that the development will not be at an unacceptable risk of flooding or exacerbate flood risk elsewhere provided any future development proceeds in accordance with the recommendations of the ES. The ES forms part of the application and any subsequent approval must proceed in accordance with the mitigation measures outlined in the FRA.

There are no detailed drainage arrangements proposed at this stage. We therefore recommend that any subsequent approval is conditioned as follows:-

**CONDITION** No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event and shall also include details of how the scheme shall be maintained and managed after completion. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

**REASON** To prevent the increased risk of flooding, both on and off site

### **Water Quality**

Chapter 6 of the Environmental Statement (ES) also considers the impacts on water quality.

A development of this size/area will have a significant impact on existing sewerage infrastructure and potentially the River Ribble via Pendleton Brook. All surface water drainage should be separated and not be allowed to overload the foul sewerage system.

The Sewerage Undertaker should be consulted and be requested to demonstrate that the sewerage and sewage disposal systems that would serve the proposed development has sufficient capacity to accommodate the additional flows, generated as a result of the development, without causing pollution. Where necessary, the development should be phased to coincide with any improvement works to the existing sewerage infrastructure network that may be required to accommodate the proposed development.

The site is underlain by Secondary A Aquifer which is overlain by low permeability deposits. It is considered that the risk to groundwater quantity and quality may be increased as a result of the proposed development.

Therefore, in order to adequately assess and mitigate the risk to surface and groundwater we recommend that the following condition is included in any planning permission.

**CONDITION** The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul and surface water has been submitted to and approved in writing by the local planning authority. The scheme shall be implemented as approved.

**REASON** To ensure a satisfactory means of foul and surface water drainage and reduce the risk of pollution to Pendleton Brook and the River Ribble

During the construction phase a scheme to treat and remove suspended solids from surface water run-off should be approved to prevent any impact to local watercourse.

Development should not detrimentally impact upon the chemical and ecological of water bodies to ensure compliance with the Water Framework Directive (WFD). The WFD is a piece of EU legislation that requires member states to make plans to protect and improve the water environment. It was implemented into law in the UK in 2003. WFD is designed to improve and integrate the way water bodies are managed throughout Europe. Member States must aim to reach good chemical and ecological status in inland and coastal waters by 2015.

For surface waters there are two separate classifications for water bodies; ecological and chemical.

'Ecological status' is recorded on a scale high, good, moderate, poor and bad and includes

- Physico-chem e.g. nutrients, pH, dissolved oxygen, ammonia
- Biological elements e.g. phytoplankton, macro algae, fish, invertebrates;
- Specific pollutants e.g. metals and compounds, organic compounds;
- Hydro morphology e.g. depth, width, flow, structure

'Chemical status' is recorded as good or fail and includes

- Priority substances which present a significant risk to the water environment

For groundwater, there are also two separate classifications for water bodies; quantitative and chemical. Groundwater status is recorded as good or poor.

There are several water bodies within the site boundary or within close proximity to the site which fall within the Mearley Brook Water Framework Classification:-

<b>Watercourse</b>	<b>Ecological status</b>	<b>Failing for</b>	<b>Expected ecological potential</b>	<b>Heavily Modified</b>
Mearley Brook	Moderate	Macro - invertebrates	Good potential by 2027	Partly, several weirs along Mearley Brook

The water bodies in the area are failing for macro-invertebrates and several artificial

structures are present within the water bodies. In order to meet the requirements of WFD it is essential that new development does not have a detrimental effect on the water bodies and that it improves and enhances them. This is especially important when a water body is currently failing. It is important to understand why a water body is failing so that any new development can focus on that particular issue.

Macro-invertebrates are insects and other small organisms that live in the river. They are useful for providing information about environmental pressures in a specific area of the river as they are less mobile than fish and are therefore more vulnerable to local changes in water quality, flow or habitat. They give an indication of:-

- Water quality (organic, toxic pollutants);
- Alterations in flow regimes;
- Sedimentation pressures;
- Habitat loss

There are many ways to comply with the WFD through new development. It is noted that for the management of surface water the applicant proposes to use Sustainable Drainage Systems (SUDS). We encourage this approach as this is particularly important to WFD and can be incorporated within the development as a technique to manage surface and groundwater regimes in a sustainable manner. Development should aim to avoid aggravating existing or creating new flooding problems, either on the site or elsewhere. Contaminated run-off from roads, drives and car parks and during construction should be well managed by the developer to ensure no pollution to surface waters and deterioration to the WFD catchment.

As well as contributing to flood risk management, sustainable drainage features can provide benefits for water quality and amenity. This development will incorporate an area of public open space including green corridors and areas for tree planting and landscaping; a SUD can help to 'green' the urban environment, and a number of techniques can even be used in high density development. Examples that could work within this development are:

- detention basins (dry) and retention ponds (wet)
- grassed swales
- porous pavements
- soakaways
- storage tanks
- vegetated waterways
- wetlands and reed beds
- 'green' roofs that store water within the plan of a building

Further information can be found at:-

[http://www.ciria.com/suds/pdf/nswg\\_icop\\_for\\_suds\\_0704.pdf](http://www.ciria.com/suds/pdf/nswg_icop_for_suds_0704.pdf)

SUDS systems can also help to provide Green Infrastructure (GI) networks which can provide many environmental, social and economic benefits and services to communities. GI offers opportunities to improve local quality of life by encouraging social inclusion, and promoting community cohesion and regeneration. The document should consider GI such as green roofs, walls, greenways, swales and ponds which can be integrated with SUDS systems.

A water body failing for macro-invertebrates can often be a sign of urban diffuse pollution that can be derived from cross-connections and foul drainage overflows.

Therefore it is essential that foul drainage arrangements are considered carefully and that this large development does not add additional pressure to current networks but uses investment to improve current conditions.

Opportunities should also be sought to 'de-culvert' any existing watercourses that are currently channelled through pipes or culverts. Several weirs are located on the watercourse, and at least one appears to be on land under the control of the applicant. We would recommend that the developer should consider options to open up the watercourse and enhance the natural environment through the removal of weirs where possible. This would make a great difference to the hydro-morphology of the channel and greatly help to achieve WFD standards.

The area falls within Assessment Point 2 Middle Ribble of the Ribble, Douglas and Crossens CAMS and there is currently water available for further licensing. However the sustainable management of water resources is crucial in ensuring that development is sustainable in terms of water usage, disposal and flood risk. It is critical that more water efficient designs are incorporated in new buildings as technology becomes more widely available and affordable.

We endorse the efficient use of water, especially in new developments. New developments could take economic advantage of these technologies and should be considered. Wide spread use of these and other technologies that ensure efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area.

For residential development we recommend this development meets the following standard to promote water efficiency:-

- Dwellings should achieve the water credits required to meet Code Level 3 of the Code for Sustainable Homes.

For non residential development where the development is being assessed against BREEAM, we recommend this development meets the following standard to promote water efficiency:-

- Buildings should achieve the maximum number of water credits in accordance with the requirements of the relevant BREEAM scheme with the exception of credits awarded for grey water/rainwater systems. These systems should be installed where cost effective and the system is designed to ensure that energy use and carbon emissions are minimised.

We also recommend that the developer considers the following, as part of the scheme:-

- Water management in the development, including, dealing with grey waters;
- Use of sustainable forms of construction including recycling of materials;
- Energy efficient buildings

## **Biodiversity**

Chapter 7 of the ES considers the ecological impacts of the proposed development.

The illustrative masterplan shows a proposed pond/SUDS attenuation feature within the proposed B1 Employment area. We would recommend that this attenuation

feature is incorporated in to the Green Corridor/Open Space area. This feature would be better suited in this location than within an employment area.

One of the mitigation measures proposed is the provision of buffers around the watercourse on and around the site.

**CONDITION** A minimum 8 metre vegetated buffer zone between Pendleton Brook and the proposed development and a minimum 5 metre wide vegetated buffer zone between every other watercourse/ditch and the propose development shall be retained as part of the development. The buffer zones shall be measured from the top of the bank of the watercourse and shall be free of structures, hard standing and fences and it shall be planted with locally native plant species of UK genetic provenance. Domestic gardens shall not be incorporated into the buffer zones in order to avoid problems such as fragmentation of the buffer by fencing; the placing of garden rubbish near the bank; the introduction of non-native species into the buffer; and pressure for inappropriate bank retention works.

**REASON** To maintain the character of the watercourse and provide undisturbed refuges for wildlife using the river corridor

Buffer zones to watercourses are required for the following purposes:

- (i) to allow the watercourse to undergo natural processes of erosion and deposition, and associated changes in alignment and bank profile, without the need for artificial bank protection works and the associated destruction of natural bank habitat
- (ii) to provide for the terrestrial life stages of aquatic insects, for nesting of water-related bird species, and for bank dwelling small mammals
- (iii) to provide a "wildlife corridor" bringing more general benefits by linking a number of habitats and affording species a wider and therefore more robust and sustainable range of linked habitats
- (iv) to allow for the maintenance of a zone of natural character with vegetation that gives rise to a range of conditions of light and shade in the watercourse itself. This mix of conditions encourages proliferation of a wide range of aquatic species, including fish
- (v) to allow, where appropriate, for the regrading of banks to a lower and safer profile, in areas where there is public access
- (vi) to prevent overshadowing of watercourses by buildings
- (vii) to reduce the risk of accidental pollution from run-off

### **Land Quality**

We have no recorded landfill sites or contaminated land sites within 250 metres of the outlined development site.

However, if, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

National Planning Policy Framework (NPPF) paragraph 109 states that the planning

system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

## **Waste**

If any waste is to be used onsite, the applicant will be required to obtain the appropriate waste exemption or permit from us. We are unable to specify what exactly would be required if anything, due to the limited amount of information provided.

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable for any off-site movements of wastes. The developer as waste producer therefore has a duty of care to ensure all materials removed go to an appropriate permitted facility and all relevant documentation is completed and kept in line with regulations.

The applicant is advised to contact the Environment Management team at the Preston Office on 01772 714198 or refer to guidance on our website <http://www.environment-agency.gov.uk/subjects/waste>

A copy of this letter has been sent to the applicant/agent.

Yours faithfully

**Philip Carter**  
**Planning Officer - Sustainable Places**

Direct dial 01772 714219

Direct fax 01772 697032

Direct e-mail [nwnorthplanning@environment-agency.gov.uk](mailto:nwnorthplanning@environment-agency.gov.uk)

cc Steven Abbott Associates LLP