

13 September 2013

Mrs J Macholc
Planning Policy Officer
Regeneration and Housing Services
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

Dear Joanne

**RESPONSE TO CONSULTATION ON RIBBLE VALLEY CORE STRATEGY EVIDENCE DOCUMENTS
STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT
ASSESSMENT OF SITE 142 FOR RESIDENTIAL DEVELOPMENT
LAND ADJACENT KILN CLOSE, CHATBURN ROAD, CLITHEROE**

Please find below our response to the above consultation, specifically relating to site 142 and made on behalf of a prospective developer.

We are pleased to note and support the inclusion of site 142 within the SHLAA.

However, there are aspects of the site assessment with which we differ. These are detailed below.

Site Details

The indication that there are employment uses beyond the railway line should be omitted. This is factually incorrect.

The visual prominence of the site is noted as 'very prominent'. This is not borne out by an inspection of the site. The site lies at a lower level than the adjoining Chatburn Road and is in great part shielded to view by a frontage wall. In any event, the site is viewed in the context of existing development at Kiln Close and Cringle Way (to the south of the railway) and Moorland Crescent to the north of the railway. The site should be described as not visually prominent.

Site Suitability

We note that the site is assessed as 'not suitable', failing one of the tests of suitability.

We understand that the nine tests of suitability are set out at paragraph 8.10 of the SHLAA August 2013 report.

The reason for the site failing one of the tests of suitability is not set out in the site assessment sheet. However, you advised that the reason in this instance is 5) – Is the site in Flood Zone 2 or 3?

The issue in this instance wholly relates to the EA flood risk designation.

We recognise the importance of flood risk as a planning consideration. However, a more refined assessment is required than whether any part of the site (however small that might be) is within a flood zone.

An extract from the EA flood risk map is appended. It shows that only a very small portion of the site immediately adjacent to the stream falls within the Flood Zones 2 /3. The bulk of that area is the land to the north of the stream. That is, land that might logically be retained as an open area, as per the land to the north of the stream adjacent to the Kiln Close development.

Accordingly, we submit that the flood risk issue is not one that would preclude a housing development at the site and / or provide reason for regarding the site as 'not suitable'. Rather, it would be more appropriate to adjust the net developable area accordingly. Indeed, this is the approach advocated in your August 2013 SHLAA report, paragraphs 8.34 to 8.36. In this instance, excluding the areas identified as at risk of flood and the land to the north of the stream the net developable area would be 1.5ha.

We would request that you make appropriate amendments to the site assessment to indicate that it is 'suitable'.

Availability

We can confirm that the site is in a single ownership (not two as stated), aiding the process of delivering development at the site.

Deliverability / Developability

We note that the site is listed as being included within the 6 – 10 year supply period. For the reasons set out above in relation to suitability and the site's availability and achievability, we submit that the site should be included within the 0-5 year supply period.

Sustainability Scoring Criteria

We submit that the scoring should be adjusted as identified below:

- S1: Main Development Location – the site has presumably been scored 3 on the basis that the site is regarded as adjacent to Clitheroe, based on the Local Plan Proposals Map settlement boundary. We do not consider this to be a sound basis for scoring the site given the Local Plan was adopted some 15 years ago and is regarded as out of date. This is most particularly in relation to the supply of land for housing. In addition, the Council acknowledges that greenfield sites on the

periphery of settlements will have to be developed to satisfy housing needs. Thus, the site should score 5;

- S7: Suitable Infrastructure – highways and utilities are available at the site boundary and, thus, the site should score 5;
- S11: Risk of River Flooding – we have addressed this issue above. Whilst the net developable area may be adjusted to take account of the issue, the greater part of the site is wholly unaffected by any flood risk. Thus, the site should score 5;
- S16: Site Contains a TPO – it is acknowledged that some field boundary trees are covered by a TPO. However, that is not an undue constraint on the developability or sustainability of the site. Thus, the site should score 5; and
- S19: Any Bad Neighbour Land Uses – it is assumed that the site has been scored 3 on the basis of a note under other comments that there is a school opposite. That is incorrect, the nearest school is The Grammar School to the south west further along Chatburn Road,. Indeed, the very closest points of the SHLAA site and the school grounds are some 170 metres apart. Thus, the site should score 5.

All references within the site assessment and not commented upon above are agreed and supported.

Please confirm receipt of these comments.

We would be pleased to discuss with you any aspects of the above.

We look forward to hear of your intentions.

Please ensure these comments are passed to the Inspector for his consideration.

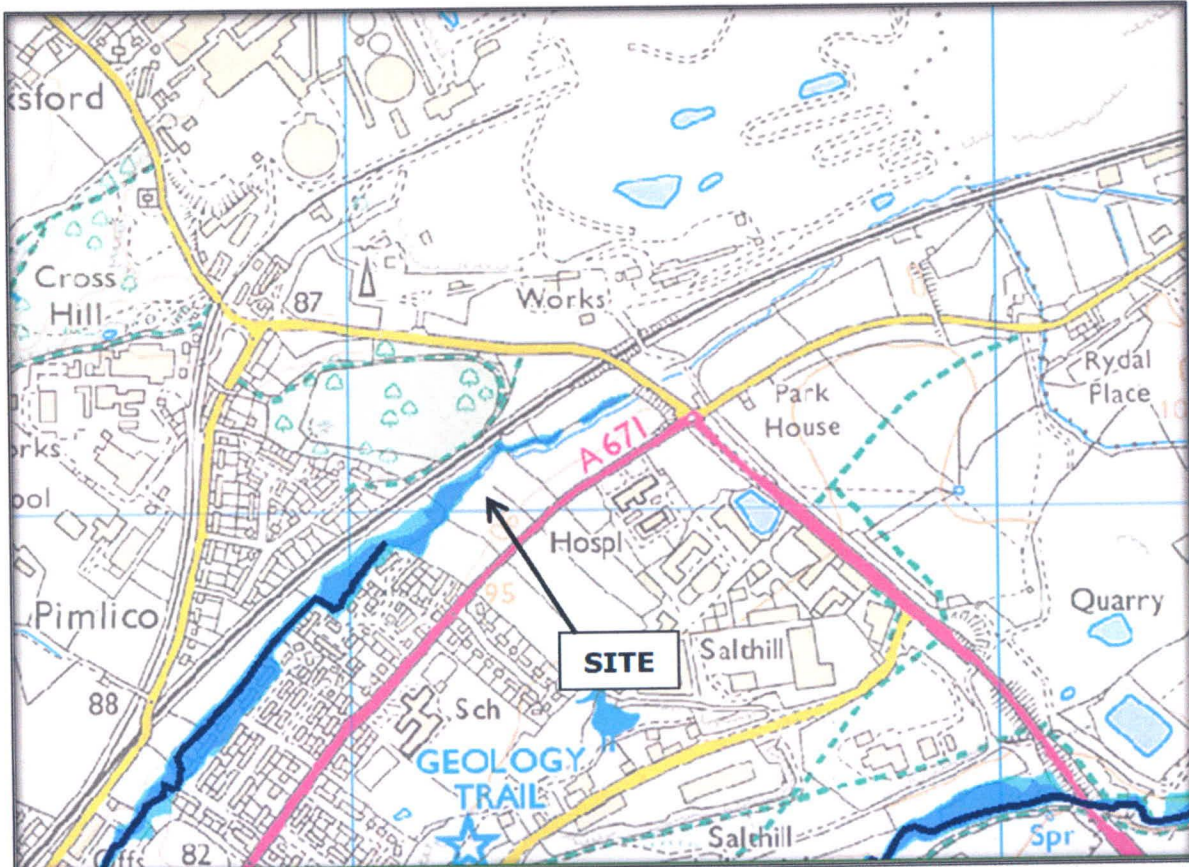
Yours sincerely



Mike Gee BA (Hons) MRTPI

Appendix: Extract from EA Flood Risk Map

The extents of flooding / flood risk associated with this watercourse are indicated on the plan below.



Key:-

Flood Zone 3- Dark blue ■ shows the area that could be affected by flooding, either from rivers or the sea, if there were no flood defences. This area could be flooded: from a river by a flood that has a 1 per cent (1 in 100) or greater chance of happening each year.

Flood Zone 2- Light blue ■ shows the additional extent of an extreme flood from rivers or the sea. These outlying areas are likely to be affected by a major flood, with up to a 0.1 per cent (1 in 1000) chance of occurring each year.