

Land North of Pendle Road, Clitheroe

Flood Risk Sequential and Exception Test

Date of report: December 2025

PREPARED FOR

 Richborough

savills

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Document History

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1. Introduction

- 1.1 Savills (UK) Limited is instructed by Richborough (the Applicant) to prepare a Flood Risk Sequential and Exception Test in support of an outline planning application with all matters reserved except for access, for a residential development at Land North of Pendle Road, Clitheroe (the Site). A copy of the Site Location Plan is attached at **Appendix A**.
- 1.2 The proposed description of development is set out below:
- “Outline planning application for the erection of up to 200 dwellings and associated landscaping, children’s play area, sustainable urban drainage, and other infrastructure with all matters reserved except access.”*
- 1.3 This Flood Risk Sequential and Exception Test should be read alongside technical information which has been provided in support of this application and includes the Flood Risk Assessment and Sustainable Drainage Strategy prepared by BWB.
- 1.4 While the majority of the Site lies in Flood Zone 1, some areas contained within the Site’s boundary are at risk of flooding and are categorised as Flood Zone 2 and Flood Zone 3, due to the location of Shaw Brook which crosses the Site from east to west. As such, the purpose of this report is to demonstrate that the Flood Risk Sequential and Exception Test has been correctly applied and passed in line with Paragraph 172 (a) of the National Planning Policy Framework (NPPF) and in accordance with National Planning Practice Guidance (PPG).
- 1.5 Paragraph 174 of the NPPF states that the purpose of the Sequential Test is to steer new development to areas with the lowest risk of flooding from any source. This assessment will review comparable sites across the Borough within and surrounding the three Principal Settlements as identified within the Core Strategy (Clitheroe, Longridge and Whalley), to confirm whether any alternative sites can accommodate the proposed development.
- 1.6 This approach with regards to identifying and establishing search areas for the purposes of this Flood Risk Sequential and Exception Test, has been agreed with Planning Officers at Ribble Valley Borough Council (RVBC) prior to the preparation of this report.
- 1.7 Furthermore, a set of criteria has been established which will confirm whether site options will be considered as reasonable alternatives, or whether a site is discounted from being considered further. The set criteria includes a review of site area, capacity, flood risk, ownership, and planning application status. The assessment will conclude whether any alternative sites are available for this scale of proposed development and confirm whether the sequential test has been passed.
- 1.8 As the development proposals are for a ‘more vulnerable’ use as set out within Annex 3: Flood risk vulnerability classification of the NPPF, an exception test is also required. This has been carried out and the conclusions are set out in this report.

2. Site Description, Site Context, and Planning History

- 2.1 The Site is located circa 1.2 km to the east of Clitheroe Town Centre, and is situated to the north of Pendle Road. A Site Location Plan is provided at **Appendix A** for reference. The entirety of the Site falls within the jurisdiction of RVBC which acts as the local planning authority.
- 2.2 Clitheroe is the largest settlement in Ribble Valley and is identified as a principal settlement within the RVBC Core Strategy (2014) alongside Longridge and Whalley. These principal settlements are identified as the focus for the majority of new housing development (RVBC Core Strategy Key Statement DS1). As such, Clitheroe lies at the top of the settlement hierarchy.
- 2.3 The Site comprises circa. 8.9 hectares of irregular shaped fields bordered by mature boundary planting in the form of hedgerows and trees. The western portions of the site is divided into four fields by a mix of hedgerow and boundary trees. The land is in use as pasture.
- 2.4 The Site is bounded by an unnamed road to the east and Pendle Road to the south, both of which have agricultural vehicular access into the site. High Moor Road lies immediately to the west, which serves as an access route to Highmoor Playing Fields, located to the north west of the site.
- 2.5 Further to the north and east of the site lie open, undeveloped fields which form the established open countryside. Existing residential communities, including the Higher Standen Farm Half Penny Meadows development (planning permission granted for up to 1040 dwellings across 6 phases) bound the Site to the south and south west. The ongoing and established residential development directly adjacent to the Site, demonstrates a shift in the immediate character and formation of development in this locality.
- 2.6 The Site is located approximately 115 metres to the west of the A59, which links the Site to the wider regional road network. There are three bus stops which are located adjacent to the Site's boundary along Pendle Road, connecting the site to Clitheroe Town Centre and the wider region including Blackburn, Chipping, Accrington and Burnley.

Planning History

- 2.7 There have been no relevant planning applications in terms of establishing the principle for development on the Site based on a review of the RVBC planning application search.
- 2.8 With regards to surrounding residential developments of relevance, directly to the south of the site lies an existing residential development referred to as Half Penny Meadows which benefits from outline and reserved matters planning permission for a residential development of up to 1040 dwellings. Taylor Wimpey who are currently progressing with a reserved matters application for the final stages of residential development (Phase 5 and 6) have already built out Phase 1 which is now occupied. Phases 2, 3 and 4 are currently being developed out, with some elements occupied. The planning consent in relation to the wider scheme included a design code which subsequent reserved matters applications have adhered to. While not completed yet, the development is generally viewed as being of a high quality example of residential development in this context.
- 2.9 There is a further residential allocation, located approximately 200 metres to the north west of the Site, which benefits from outline planning consent (app ref: 3/2020/0601), for up to 125 homes,

granted 8 February 2023. At the current time there does not appear to have been any applications submitted in terms of the reserved matters, noting that the expiry date of this permission is 8 February 2026.

Proposed Development

- 2.10 The proposals seek outline planning permission for up to 200 residential dwellings (Use Class C3) and associated works. The proposed description of development is as follows:

Outline planning application for the erection of up to 200 dwellings and associated landscaping, children's play area, sustainable urban drainage, and other infrastructure with all matters reserved except access.

- 2.11 The proposed development includes the following:

- land to be reserved for the erection of up to 200 dwellings with a mix of housing tenures to suit different needs;
- land preserved for enhanced landscaping and creation of new areas of open space;
- at least 30% of dwellings to be affordable in line with policy requirements;
- at least 15% of dwellings be suitable accommodation for over 55's in line with policy requirements (7.5% affordable, 7.5% market sale);
- new network of walking and cycling routes, promoting active travel;
- new vehicular access off Pendle Road;
- focal community square, woodland trails, trim trail and children's play area;
- creation of Sustainable Urban Drainage Systems (SUDS), in the form of water meadows, to manage surface water; and,
- a minimum of 10% biodiversity net gain in accordance with national policy.

- 2.12 Further details on the proposed development is set out within the Design and Access Statement prepared by Pegasus, which should be read alongside this report as well as the Planning Statement prepared by Savills.

- 2.13 The Land Use Parameters Plan and Illustrative Development Framework Plan have been designed to acknowledge on-site technical constraints including flood risk and tree coverage. Development parcels allocated for the construction of dwellings have been positioned well away from Shaw Brook to avoid any flood risk impacts on more vulnerable uses. The only form of development proposed over Shaw Brook will be the construction of a new access bridge and road, which will be used by vehicles and pedestrians. This necessary infrastructure will be constructed to a high quality standard, accounting for any flood risk associated with Shaw Brook.

- 2.14 A copy of the submitted Land Use Parameters Plan and Illustrative Development Framework is attached at **Appendix B**.

3. Review of Flood Risk

- 3.1 Flood risk is defined as a combination of both the probability and the potential consequences of flooding as set out within Paragraph: 001 Reference ID: 7-001-20220825 of National Planning Practice Guidance (PPG). The Environment Agency (EA) has allocated several zones to determine the probability of flooding, with Zone 1 reflecting the lowest probability, Zone 2 reflecting a medium probability and Zone 3a reflecting a high probability. Zone 3b is allocated for areas which comprise of a functional floodplain. A full review of the Site's risk of flooding has been carried out upon examination of the EA's Flood Map for Planning Service, and set out in further detail below.

Flood Risk – Fluvial Flooding (Rivers and Sea)

- 3.2 The majority of the Site falls within Flood Zone 1, with the exception of an existing brook (Shaw Brook) which crosses the site from east to west and falls within Flood Zone 2 and 3. The extent of the Site's flood risk areas are indicated in Figure 1 below.

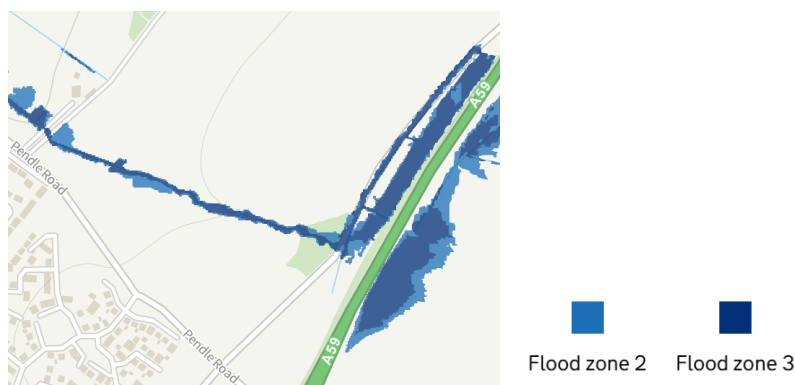


Figure 1. Flood risk identified on site (Rivers and Sea). Source: Environment Agency

Flood Risk – Pluvial Flooding (Surface Water)

- 3.3 The vast majority of the Site is not subject to risk of flooding from surface water, as indicated in Figure 2 below.

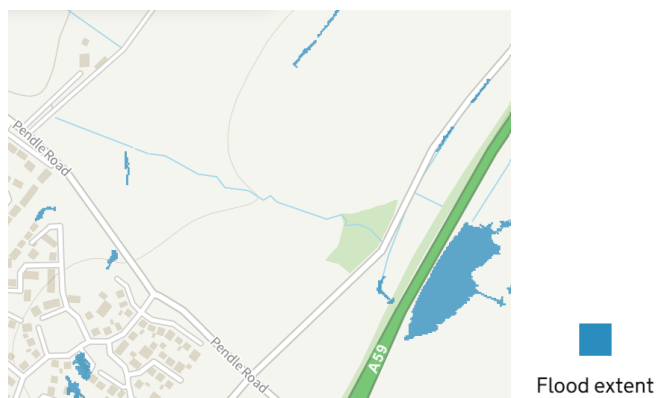


Figure 2. Flood risk identified on site (Surface Water Flooding). Source: Environment Agency

- 3.4 There is a small area of medium / high risk in the west of the Site associated with a localised depression.

Reservoirs

- 3.5 The Site does not fall within an area at risk of flooding from reservoirs.

Summary

- 3.6 With regards to fluvial flooding, the majority of the Site falls within Flood Zone 1 and is subject to a low probability of flooding. There is however, a small area of land (Shaw Brook) which falls within Flood Zone 2 and Flood Zone 3, and is subject to moderate to high levels of flood risk. With regards to pluvial flooding, the majority of the site is unaffected by surface water. Appropriate mitigation measures for both fluvial and pluvial flooding has been set within the accompanying Flood Risk Assessment prepared by BWB. The Site does not reflect any area at risk of flooding from reservoirs.

4. Planning Policy and the Requirement for a Sequential Test

- 4.1 This sections provides an overview of the relevant local and national planning policies, as well as sets out guidance which requires applicants to undertake a Flood Risk Sequential Test. The requirements for an Exception Test are set out separately in Chapter 6.
- 4.2 As there are areas of the Site which are at risk of medium to high probability of fluvial flooding, a Sequential Test is required to be carried out and submitted as part of the supporting evidence for this major planning application, in accordance with Paragraph 173 and 174 of the NPPF.
- 4.3 It is worth nothing that the Land Use Parameters Plan and Illustrative Development Framework Plan which are being submitted as part of this planning application, indicates that no vulnerable dwellings or development parcels are proposed over the areas affected by flood risk. Access will be required however, in the form of a crossroad and bridge to be constructed over the brook, and the indicative location for this is shown on the submitted plans.
- 4.4 Full details of the construction of the bridge will be required at a later planning stage. This approach takes into account Paragraph 181 (a) of the NPPF which states that the most vulnerable development should be located in areas of lowest flood risk (i.e. Flood Zone 1 locations), unless there are overriding reasons to a prefer a different location. In accordance with Paragraph 181 (c), SUDS is also proposed within the boundary of the site.

The Development Plan

- 4.5 At a local level, the relevant Development Plan documents for RVBC comprise of the following:
- Ribble Valley Core Strategy 2008 - 2028 (Adopted 2014); and,
 - Housing and Economic Development, Development Plan Document (HED DPD), including the Proposals Map (Adopted 2019).

RVBC Core Strategy (Adopted 2014)

- 4.6 The Core Strategy 2008 – 2028 A Local Plan for Ribble Valley, was formally adopted in December 2014, and forms the primary document within the Development Plan, alongside saved policies within the Districtwide Local Plan. There are several planning policies which relate to the determination of the proposals with regards to flood risk and drainage. The following policies set out in Table 1 are of relevance.

Table 1. Flood Risk Related Planning Policies (RVBC Core Strategy)

Policy Reference	Summary
KS DS1 Development Strategy	KS DS1 confirms that new residential development will be supported in Principal Settlements of Clitheroe, Longridge and Whalley. There is also reference to a strategic site (Higher Standen Farm) which is located to the south of Clitheroe, adjoining the A59. This strategic site is adjacent to Land North of Pendle Road, Clitheroe.

There are a number of existing services and facilities which could support new residential development within these established Principal Settlements.

KS DS2 Presumption in Favour of Sustainable Development	KS DS2 states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF, and that proposals will be approved where possible to secure development which improves the economic, social and environmental conditions in the area.
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Policy DMG1 General Considerations	DMG1 states that all development should be sympathetic to existing and proposed land uses in terms of size, intensity and nature, as well as scale, massing, style, features and building materials.
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With regards to the environment, development proposals should consider implications and possible effects upon the natural environment. The Council propose that the principles of the mitigation hierarchy be followed:

- 1) Enhance the environment
- 2) Avoid the impact
- 3) Minimise the impact
- 4) Restore the damage
- 5) Compensate for the damage
- 6) Offset the damage

With regards to amenity, the policy states that development should not adversely affect the amenities of the surrounding area, and have regard to public safety and secured by design principles.

Development proposals should not prejudice future development which would provide significant environmental and amenity improvements.

Policy DMG2 Strategic Considerations	DMG 2 states that development should be in accordance with the Core Strategy development strategy and should support the spatial vision. The policy confirms development proposals in the Principal Settlements of Clitheroe, Longridge and Whalley should consolidate, expand or round-off development so that it is closely related to the main built up areas, ensuring this is appropriate to the scale of, and in keeping with, the existing settlement.
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Policy DME6 Water Management	DME6 states that development will not be permitted where the proposal would be at an unacceptable risk of flooding or exacerbate flooding elsewhere.
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It is encouraged that development proposals include appropriate measures for the conservation, protection and management of water such that development contributes to:

1. preventing pollution of surface and / or groundwater
2. reducing water consumption
3. reducing the risk of surface water flooding (for example the use of SUDS).

All proposals should include details for surface water drainage and means of disposal based on sustainable drainage principles.

4.7 There is no reference within the Core Strategy to sequential testing in relation to flood risk.

Housing and Economic Development, Development Plan Document (HED DPD)(Adopted 2019)

4.8 Following adoption of the CS, the Council had prepared an accompanying HED DPD which contains detailed policies for matters relating to housing and economic development, and sets out specific site allocations in the form of a Proposals Map. The HED DPD was formally adopted in October 2019 and forms part of the Development Plan, albeit the site has not been allocated for a specific use within the adopted Proposals Map.

4.9 There is no reference within the HED DPD to sequential testing in relation to flood risk.

National Planning Policy and Guidance

4.10 At a national level, the relevant policy and guidance includes the following:

- National Planning Policy Framework 2024 (Updated February 2025)(NPPF), Chapter 14 'Meeting the challenge of climate change, flooding and coastal change';
- National Planning Practice Guidance (PPG) on 'Flood Risk and Coastal Change' (updated September 2025), and Annex 3: Flood risk vulnerability classification; and,
- Flood Risk Assessment: Applying for Planning Permission (October 2025).

Consultation NPPF December 2025

4.11 On 16th December 2025 a new draft NPPF was released for consultation. This consultation will run until 10th March 2026, and before this revised NPPF is formally published it will hold no weight in the determination of this application. However, the applicant reserves the right to supplement this application, once the new NPPF is formally published.

Sequential Test Requirements

4.12 A full review of adopted planning policy and guidance has been carried out which indicates that a Flood Risk Sequential Test is required, due to the type of development proposed, and the level of flood risk associated with the Site.

Fluvial Flood Risk

4.13 Paragraph 170 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 172 of the NPPF states that all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

4.14 Both Paragraph 170 and 172 of the NPPF are engaged, in that the Site has been identified as containing land within Flood Zone 2 and Flood Zone 3 with regards to fluvial flood sources. The

proposed use (residential – C3) in terms of its vulnerability to flooding and flood risk incompatibility is also taken into consideration, and as set out in Annex 3 of the NPPF, residential development is considered a 'more vulnerable' use.

- 4.15 The PPG provides extensive advice on dealing and addressing flooding and coastal change risks in association with the planning and development process. With regards to setting the full scope, a 'sequential test', is required whereby it is not possible to locate development on a site within the lowest risk of flooding (Flood Zone 1) as established by Paragraph 170 of the NPPF, and therefore, alternative and reasonable comparable sites are to be assessed. The sequential test is required to be passed, and then where necessary, an exception test is carried out. Further detail on the requirement for an exception test is set out in Chapter 6. Paragraph 174 of the NPPF further supports this by stating that the purpose of a sequential test is to steer new development to areas with the lowest risk of flooding from any source and that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 4.16 The purpose of the sequential test is therefore to review and assess reasonable alternative sites for development, within an area at lower risk of flooding.

Site Search Area Identification

- 4.17 The PPG provides guidance on how to determine search areas of alternative sites, as part of the sequential test (027a Reference ID: 7-027a-20220825). The search areas should always be appropriate to the nature and scale of development proposed and the sequential test should be applied appropriately, with a focus on selecting realistic alternatives in areas of lower flood risk that could meet the same development need. The search areas which have been identified as appropriate for this sequential test, includes land within the Principal Settlements (Clitheroe, Longridge or Whalley) or directly adjacent to these settlement boundaries. The approach with regards to identifying and establishing search areas for the purposes of this Flood Risk Sequential Test, has been prior agreed with Planning Officers at RVBC. This policy position has also been used to determine site assessment criteria as set out within Chapter 5 (Methodology and Assessment).

Pluvial Flood Risk

- 4.18 With regards to pluvial flood risk (surface water) the Site contains a small area land at risk of low to medium chance of surface water flooding from this water source, and therefore the Sequential Test will solely relate to fluvial flood risk only. As presented on the Illustrative Masterplan (Appendix B), a development can be designed to avoid areas at risk of pluvial flood sources, locating most vulnerable uses within area unaffected by surface water flooding locations, and therefore this approach is in accordance with PPG paragraph 004 Reference ID: 7-004-20220825. The supporting Flood Risk Assessment prepared by BWB also suggests that the implementation of a SUDS drainage system will help mitigate the effects of surface water flooding, and that overall the flood risk to development is low.

Planning Reforms

- 4.19 Recent reforms from September 2025, have indicated a requirement for a sequential test to be applied to both major and non-major development proposals in areas at risk of flooding. The updated reform mentions that where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design and mitigation measures would ensure that occupiers and users remain

safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.

- 4.20 As the site is subject to fluvial flooding and contains land which falls within Flood Zone 2 and Flood Zone 3, a sequential test and exception test is required to support this application.

5. Methodology and Assessment

5.1 This Flood Risk Sequential and Exception Test has been prepared in accordance with up to date national planning policies and guidance. With regards to local planning guidance on Flood Risk Sequential and Exception Testing, there are no adopted guidelines.

5.2 It is proposed that the scope of the Flood Risk Sequential and Exception Test is proportionate and therefore reflective of the scale of the development, type of flooding present, and its extent.

Scope of Area of Search

5.3 In this context, the following is proposed in terms of the scope of assessment, which has been agreed prior with Planning Officers at RVBC:

- Area of search as Principal Settlements (Clitheroe, Longridge and Whalley) and immediate surrounding areas only, using the following sources:
 - allocated sites (HED DPD – Policy Map);
 - sites with extant planning permissions identified in the Housing Land Availability Survey (2022) and updated Housing Land Availability Survey from March 2025 (HLAS);
 - sites identified within the Housing Land Availability Schedule (2013), accompanying the Strategic Housing Land Availability Assessment (Updated 2013);
 - other sites with planning permission granted after the last monitoring report (April 2022 onwards); and,
 - sites available on the open market.

Site Assessment Criteria

5.4 In order to ascertain reasonable alternative sites, a set of criteria has been established, and listed out below:

- Site Area – The alternative site must be comparable to the Site's size of 8.9 hectares. It is reasonable to discount all sites which do not fall within approximately 10% above or below 8.9 ha (8.0 ha to 10 ha).
- Capacity – The alternative site must be comparable with regards to accommodating circa 200 dwellings. A buffer of 10% above or below is an appropriate threshold. Sites which can accommodate between 180 to 220 dwellings are considered suitable alternatives only.
- Level of Flood Risk – The level of flood risk associated with alternative sites is critical to review, given this is a Sequential and Exception Test which is to consider reasonable alternatives with lesser flood risk associated.

Sites which fall entirely within Flood Zone 1 are considered preferable, however Flood Zone 2 and 3 sites are assessed where there are no suitable alternatives. Sites which contain equal to or greater flood risk, and/or various sources of flood risk are discounted from this exercise.

- **Ownership** – Sites which are within a single ownership are preferred as this reduces risk of delays with purchasing a site and disagreeable parties. Sites which are in multiple ownership are discounted.
- **Planning Application Status** – Sites with existing planning permissions in place or that have an allocation within the adopted Development Plan are likely to be delivered over the plan period. Where development has commenced on any site with planning permission, by way of discharging pre-commencement planning conditions, or if construction has begun on site, these alternatives will be discounted from the offset.

Assessment of Applicable Sites

- 5.5 As outlined above, an assessment of alternative sites suitable for a residential development of a similar scale to the proposed development has been carried out, and is set out below.

Discounting Sites Process

- 5.6 When reviewing reasonable and comparable site alternatives, the following points were considered when sifting through sites:
- Does the site have planning permission in place and is currently being developed out, or has been built out?
 - Does the site meet the minimum requirements of 8 ha?
 - Can the site fit the required quantum of development (circa. 200 dwellings)?
 - Is the site at greater risk of flooding (contains areas of high flood risk)?
 - Is the site within a single ownership?
- 5.7 Sites which are currently being built or have already been built out are considered discounted from this exercise, given that these sites are not considered readily available for development. Additionally, sites which cannot achieve a similar amount of development quantum on site (180 – 220 dwellings) were discounted from being considered as comparable site options. With regards to sites which presented greater flood risk, these were not considered further.
- 5.8 **Appendix C** captures the full extent of site sifting in the form of a completed alternative / comparable site matrix, as well as the detail set out below in the various sub-categories.

Allocated Sites

- 5.9 Allocated sites within and immediately surrounding the Principal Settlements have been identified, and are a key source of reasonable alternatives, given they have an extant allocation within the adopted Development Plan. Each of the allocated sites will have been subject to a technical review by the Council and deemed acceptable for development from a technical flood risk and drainage perspective. The sites selected include the following:

Clitheroe

- Land at Chatburn Road, Clitheroe (HAL3)

- Land off Hawthorne Place, Clitheroe (HAL4)
- Land at Highmoor Farm, Clitheroe (HAL5)

Longridge

- There are no housing allocations in Longridge

Whalley

- There are no housing allocations in Whalley

- 5.10 With regards to the three housing allocations within Clitheroe, none of these sites meet the sizing or capacity requirements, and Land at Highmoor Farm, Clitheroe has outline planning permission for 125 dwellings. It has been demonstrated that there are no housing allocation site alternatives within Clitheroe, Longridge or Whalley.

Sites with extant planning permissions identified in the Housing Land Availability Survey (2022) and updated Housing Land Availability Survey from March 2025 (HLAS);

- 5.11 Sites with existing planning permissions in place, as set out within the former HLAS 2022 and recently published HLAS 2025 have been reviewed as these sites have been considered in light of acceptability of the principle of development, and with regards to any flood risks associated with the site.
- 5.12 A total of 10 sites have been discounted due to not meeting minimum sizing, residential capacity requirements or are not available as they have either been built out in full or development is progressing on site. These sites are listed below:
1. Land at Higher Standen (Retirement Living Provision)
 2. Land off Waddington Road, Clitheroe
 3. Land off Henthorn Road, Clitheroe
 4. Henthorn Road, Clitheroe
 5. Land at Preston Road, Longridge
 6. Land at Dilworth Lane, Longridge
 7. Chipping Lane – Phase 1 Longridge
 8. Land East of Chipping Lane, Longridge Phases 2 & 3
 9. Land East of Clitheroe Road, Whalley
 10. Land at Accrington Road, Whalley
- 5.13 With regards to Clitheroe, there are two remaining phases (Phase 5 & 6) at Higher Standen Strategic Site. A live reserved matters planning application for 265 dwellings was submitted in 2022, and is with RVBC for determination. The remaining phases are also within several ownerships (Taylor Wimpey and the Standen Estate). The site is therefore discounted as it is not a realistically available site as it is being developed out by Taylor Wimpey Manchester.
- 5.14 There are no identified suitable alternative sites with extant planning permission identified within the HLAS 2022 or HLAS 2025, in any of the Principal Settlements.

Sites granted planning permission since the Housing Monitoring Report (April 2022 onwards)

- 5.15 A site on the edge of Longridge was granted planning permission in December 2023 for 91 residential dwellings. A review of planning application history indicates a number of non-material amendments have been applied for, as well as conditions discharged. The site also does not meet capacity or sizing requirements, therefore, it is reasonable to discount the site for consideration.

Sites identified within the Housing Land Availability Schedule (2013), accompanying the Strategic Housing Land Availability Assessment (Updated 2013)

- 5.16 All sites of relevance have been extracted from the Housing Land Availability Schedule (2013) and reviewed accordingly. All sites from this schedule identified within Clitheroe, Longridge and Whalley have been built out in full or partially built out and occupied. As such, there are no opportunities for further development activity on these sites and a total of 10 have been further discounted.

Other sites with planning permission granted after the last monitoring report (April 2022 onwards)

- 5.17 A single site (Land West of Preston Road, Longridge (Alston Grange) Phase 3), in Longridge has been granted planning permission for 91 dwellings in December 2023. Planning application activity indicates the development is still ongoing. The site does not also meet minimum sizing or capacity requirements and is therefore discounted.

Sites available on the open market

- 5.18 A review of sites which are available for purchase on the open market in Clitheroe, Longridge and Whalley, or directly adjacent to these settlement boundaries has been undertaken.
- 5.19 The list of sites available are set out below:
- Nova Primrose Road, Clitheroe, Lancashire BB7 1BS
 - The Tyremen, New Market Street, Clitheroe, BB7 2JW
 - Land adj Black Horse Inn Pimlico Road Clitheroe BB7 4PZ
 - Waddow Hall, Waddington Road, Clitheroe
- 5.20 There are no suitable open market sites within Whalley or Longridge. All sites available for purchase on the open market are not suitable for a development of this scale, due to sizing and capacity restrictions, as well as greater flood risk associated. A total of 4 sites are discounted from this subcategory.

Summary

- 5.21 In summary, a total of 29 sites have been reviewed and assessed as to whether there are any reasonable and comparable sites to accommodate the proposed scale and quantum of development. As demonstrated, there are no sites which meets the requirements for a development of this scale, in this sustainable location.
- 5.22 The Sequential Test is therefore considered passed.

6. Exception Test

Policy and Guidance Review

- 6.1 A review of Annex 3 of the NPPF and Paragraph: 032 Reference ID: 7-030-20220825 of the PPG, has been undertaken to confirm that an Exception Test is required to be applied to these development proposals, as residential dwellings are defined as a 'more vulnerable' use with regards to flood risk vulnerability, as set out in Table 2: Flood risk vulnerability and flood zone 'incompatibility'.
- 6.2 Figure 3 below visually represents the flood risk vulnerability and flood zone incompatibility, as defined within the NPPF and PPG.

Table 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

Figure 3. Flood Risk Vulnerability Classification (PPG)

- 6.3 Further to this, at paragraph 177, the NPPF confirms that once a sequential test is applied, and there are no alternative locations for development to be located in an area at lower risk of flooding, an exception test may need to be applied. The need for an exception test depends on the potential vulnerability of the site and of the proposed development, in line with the Flood Risk Vulnerability Classification set out in Annex 3. This development is considered 'more vulnerable' as set out above and therefore an exception test is required.
- 6.4 Paragraph 178 of the NPPF, states that to pass the exception test, it should be demonstrated that the development would provide wider sustainability benefits to the community which would outweigh the flood risk, and that the development would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, to reduce flood risk overall. As demonstrated on the submitted Land Use Parameters Plan (ref: P25-2353_DE_003,

Revision A) and Illustrative Development Framework Plan (ref: P25-2353_DE_002_01, Revision D) the proposed development does not allocate any dwellings or development parcels across areas which fall within Flood Zone 2 or Flood Zone 3. There will be however, a requirement to develop vehicular and pedestrian access over the existing brook.

Exception Test

- 6.5 The purpose of this Exception Test is to demonstrate that the development proposals which are located within an area of flood risk, will provide greater sustainability benefits to the local community, that outweigh the risk of flooding. The development needs to demonstrate that it will be safe for its lifetime, taking into account the vulnerability of end occupiers, and without increasing risk of flood elsewhere. This is a method to demonstrate that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.
- 6.6 A list of clear benefits of the scheme are set out below which is to demonstrate all benefits outweigh the flood risk associated with a residential development of the site.
- The provision of homes in this location will ensure the meeting of a local housing need, and the specific affordable housing need of Clitheroe, in a location which can enable residents to utilise active and public transport modes to access key facilities, services, and employment opportunities. This is at a time when the Council cannot demonstrate the requisite level of housing land supply.
 - The proposed development would provide a biodiversity net gain of 10% as a minimum, in accordance with national requirements, in the form of either on-site or off-site contributions.
 - The illustrative proposals will result in the provision of new and improved landscaped areas, and tree planting and will respect existing vegetation where possible.
 - The proposal will provide new play facilities for new and existing residents;
 - There will be local economic benefits associated with both the construction and operational phases; and
 - The illustrative proposals consider the existing context of the site, and provision has been allocated for a sustainable urban drainage system and a proposed swale.
- 6.7 A full and comprehensive list of scheme benefits is set out in Chapter 7 of the submitted Planning Statement.
- 6.8 These benefits clearly outweigh the flood risk, particularly as the Flood Risk and Drainage Strategy shows that mitigation can be provided within the scheme, incorporating a sustainable urban drainage system (SUDS) that will actually improve the current flood risk, which aligns with Paragraph 178 a) which states that the development will be safe, and where possible will reduce flood risk overall.
- 6.9 Once completed, there would be no increase in flood risk to any neighbouring properties, and no risk of flooding to proposed dwellings. The design of the access road will ensure that it will remain passable even in a severe storm event as a means of escape if necessary.

Be Safe from Flooding and not Increase Flood Risk Elsewhere

- 6.10 As previously stated, the Flood Risk and Drainage Strategy shows that the development will be safe from flooding for its lifetime and not increase the risk of flooding elsewhere via the use of SUDS on site. The location of these features are indicatively shown on the Development Framework Plan.

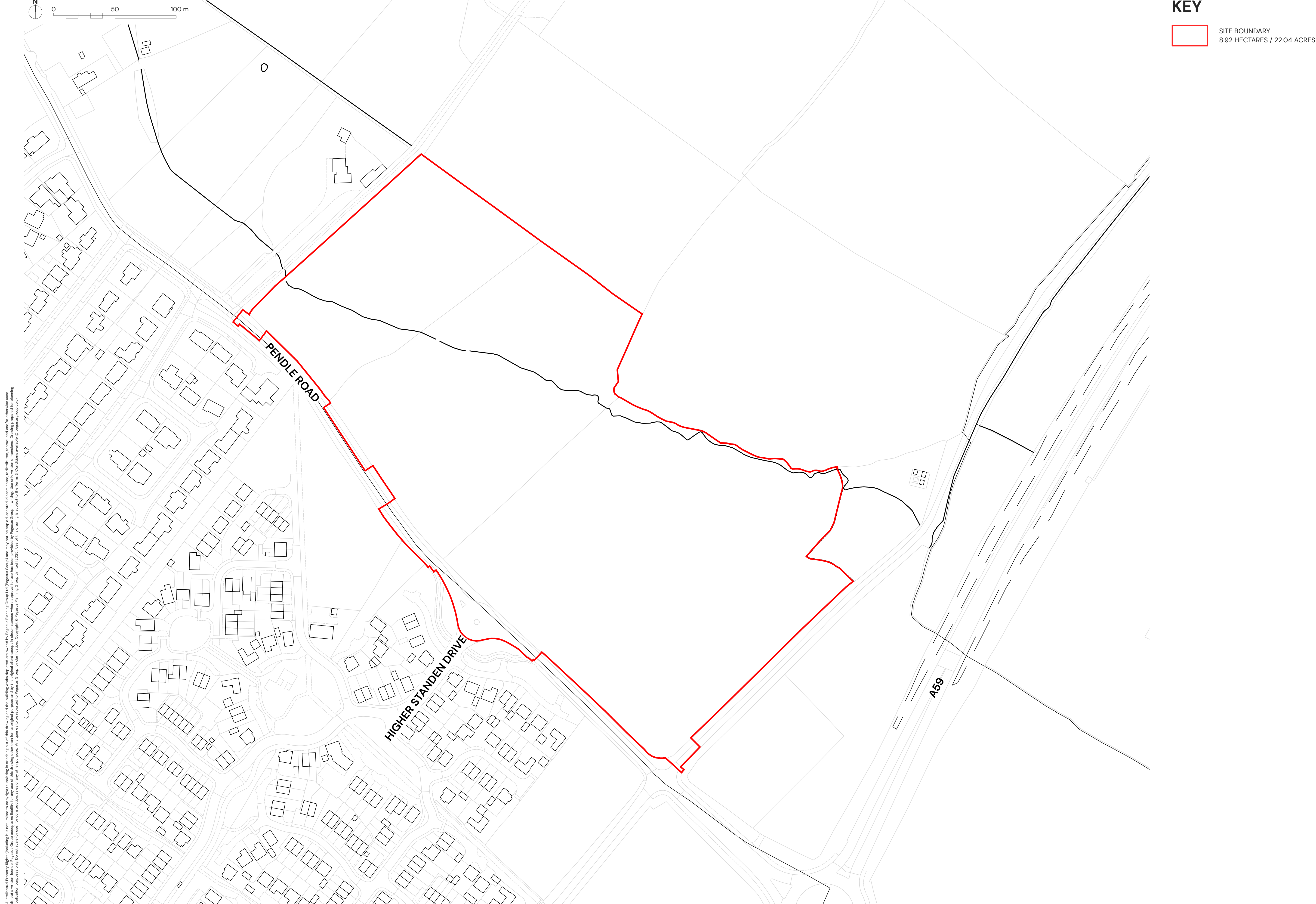
Summary

- 6.11 The proposal, having already passed the sequential test, passes the exception test owing to the benefits outweighing the limited risk of flooding, and the fact that the development has been shown to be safe from flooding for its lifetime and to no increase flooding elsewhere.

7. Conclusion

- 7.1 This Flood Risk Sequential and Exception Test has been prepared as a future access (subject to detailed design) within a proposed residential development at Pendle Road, Clitheroe crosses an area which is shown to be at risk of fluvial and pluvial flooding.
- 7.2 In accordance with national policy a sequential test is required in relation to fluvial flood risk. However, it is not required in terms of pluvial flooding as the site specific flood risk and drainage assessment shows that following the implementation of mitigation measures real world risk would be negligible.
- 7.3 In line with policy in the NPPF and guidance in the PPG, the scope of the sequential test means that sites within or directly adjacent to Principal Settlements (Clitheroe, Longridge, Whalley) are considered for assessment.
- 7.4 A full and comprehensive site search has been carried out (**Appendix C**), based on an agreed site search area, and set of criteria.
- 7.5 No sites within Clitheroe, Longridge or Whalley are considered to be a reasonable alternative for this scale of development proposed.
- 7.6 There is a need for providing additional land for housing across the plan period, and therefore, the site presents itself as the next most sequentially preferable location, and thus passes the sequential test.
- 7.7 As the sequential test has been passed, an exception test must be undertaken as the use is classified as more vulnerable. The sustainability benefits of the scheme have been shown to outweigh the limited harm of flood risk. In addition to this the FRA shows that mitigation in the form of SUDS will ensure that the development will be safe for its lifetime and also not cause increased flood risk elsewhere.
- 7.8 To conclude, this Flood Risk Sequential and Exception Test has demonstrated that both the sequential and exception tests has been passed on the Site.

Appendix A Site Location Plan



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PENDLE ROAD, CLITHEROE – SITE LOCATION PLAN



Appendix B Illustrative Masterplan & Land Use Parameter Plan



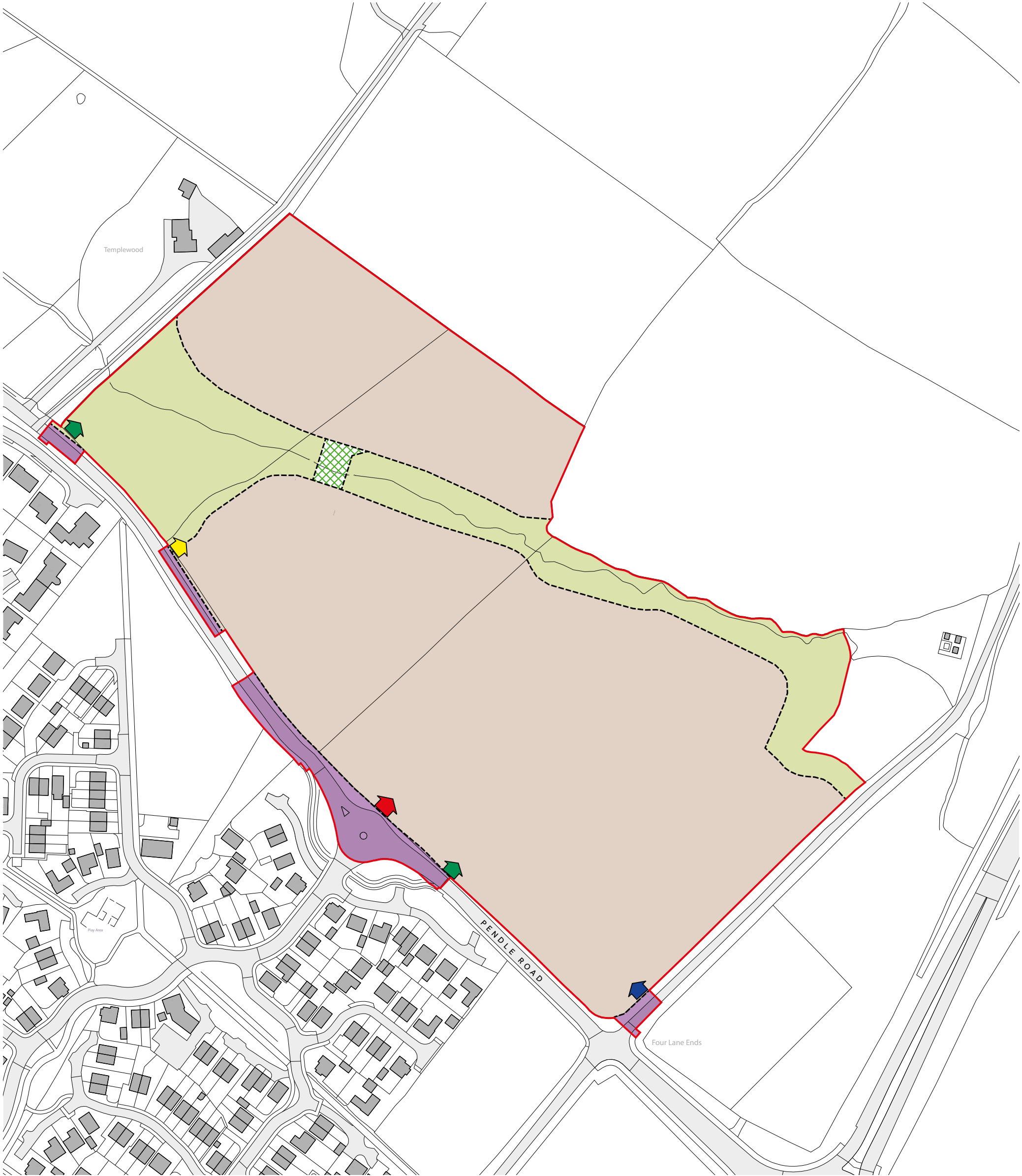
KEY

- SITE BOUNDARY
- SITE ACCESS VIA PENDLE ROAD
- RESIDENTIAL DEVELOPMENT
- PUBLIC OPEN SPACE
- PRIMARY STREET
- SECONDARY STREET
- TERTIARY STREET
- PRIVATE LANES
- ACTIVE TRAVEL ROUTES
- EXISTING PUBLIC RIGHTS OF WAY
- PEDESTRIAN ACCESS POINT TO WIDER MOVEMENT INFRASTRUCTURE
- EMERGENCY VEHICLE, PEDESTRIAN, AND CYCLIST ACCESS
- PLAY SPACES
- EXISTING VEGETATION
- TREE PLANTING
- SUSTAINABLE DRAINAGE
- EXISTING WATERCOURSE

KEY PRINCIPLES

- PRIMARY ACCESS POINT VIA PENDLE ROAD;
- PRIMARY MOVEMENT ROUTES;
- SECONDARY STREET;
- TERTIARY STREET;
- FOCAL SQUARES ALONG PRIMARY AND SECONDARY MOVEMENT ROUTES;
- ACTIVE TRAVEL ROUTES;
- MAXIMUM OUTWARD FACING DEVELOPMENT OVER NEWLY CREATED PUBLIC OPEN SPACE;
- RETAINED WATERCOURSE ROUTE;
- MAXIMUM RETENTION OF EXISTING VEGETATION;
- AREA OF PLAY;
- RETAINED CONTEXTUAL VIEWS THROUGH SITE;
- DEVELOPMENT SET BACK TO RETAIN VIEWS OF THE PENDLE HILL; AND
- SITE LOW POINTS UTILISED FOR SUSTAINABLE DRAINAGE SOLUTIONS.

PENDLE ROAD, CLITHEROE – ILLUSTRATIVE DEVELOPMENT FRAMEWORK PLAN



LEGEND

Site boundary

LAND USE PARAMETERS

Proposed residential development (Use Class C3)
(including roads, footpaths, private drives, amenity and incidental open space and other associated infrastructure, subject to detailed design)

Proposed open space
(including amenity green space, children's play provision, landscaping, footpaths, drainage and other associated infrastructure, subject to detailed design)

Indicative area of land required for internal access roads not within the residential land use
(subject to detailed design)

Indicative area of land required for the proposed access, not within the residential land use
(subject to detailed design)

ACCESS PARAMETERS

Proposed access/egress for all modes
(subject to detailed design)

Potential access/egress for pedestrians only
(subject to detailed design)

Potential access/egress for cyclists and pedestrians only
(subject to detailed design)

Potential emergency access for emergency vehicles and access/egress for cyclists and pedestrians
(subject to detailed design)

Note: All features and areas are subject to detailed design and to a tolerance of 10m.

0 100m

REVISION B: Emergency access added
REVISION A: Updated following layout changes
FIRST ISSUE: For client comment

(22.12.2025 JT)
(17.12.2025 JT)
(11.12.2025 JT)

Appendix C Alternative / Comparable Sites Matrix (Nov 2025)

Land North of Pendle Road, Clitheroe

Clitheroe

Site	Area (Approx. ha)	Capacity	Flood Risk	Ownership	Planning Application Status	Recommendation
Residential Allocations in the HED DPD (Adopted Proposals Map)						
Land at Chatburn Road, Clitheroe (HAL3)	0.7	20 dwellings	Low flood risk, however directly to the north western boundary of the site lies areas within high risk.	Oakmere Homes Limited	3/2020/0325 – Full planning consent granted Aug 2021 for 17 dwellings. 3/2017/0653 – Full planning consent granted for 30 dwellings approved Nov 2018.	Not suitable. The site does not meet minimum size or residential capacity requirements.
Land off Hawthorne Place, Clitheroe (HAL4)	1.7	40 dwellings (57 dwellings approved)	Overall low risk of flooding, however the eastern boundary of the site is subject to surface water flooding.	Persimmon Homes	3/2022/0087 – NMA approved in February 2022, 57 dwellings approved. 3/2019/1104 – Full planning permission granted for 58 dwellings in December 2021.	Not suitable. The site does not meet minimum size or residential capacity requirements.
Land at Highmoor Farm, Clitheroe (HAL5)	5	100 – 125 dwellings	No to low risk of flooding. Small area of surface water flooding indicated to the western boundary of the site.	Clitheroe Royal Grammar School	3/2020/0601 – Outline planning permission granted Feb 2023 for 125 dwellings.	Not suitable, given outline planning permission has been granted for another development, and minimum sizing requirements are not met.

Sites with extant planning permissions identified in the HLAS (2022) and updated HLAS (2025)

Land North of Pendle Road, Clitheroe

Land at Higher Standen Farm (Phase 5 & 6 - Remaining Phases of Development)	13	265 dwellings	Low risk of flooding from river on site, however site adjoins existing brook to the south, subject to high flood risk. Area identified within the centre of the site as subject to surface water flood risk.	Taylor Wimpey Manchester and Trustees of the Standen Estate.	3/2022/0317 – Reserved Matters for Phase 5 & 6 (265 dwellings), awaiting approval. 3/2012/0942 – Outline planning permission granted in April 2014.	Not suitable due to outline planning permission granted, and reserved matters planning application awaiting determination. There are also multiple owners.
Land at Higher Standen (Retirement Living Provision)	3.5	68 dwellings	Low risk of flooding.	Wrightcare Developments Ltd and the Trustees of the Higher Standen Farm Settlement	3/2025/0485 – NMA approved June 2025. 3/2025/0486 – Conditions approved in June 2025. 3/2023/0305 – Full planning for 68 bed care retirement home, granted in January 2024.	Not suitable due to full planning permission granted, NMA's applied for and conditions discharged. The site does not meet minimum sizing and capacity requirements.
Land off Waddington Road, Clitheroe	9.2	241 dwellings approved	There are some areas which contain moderate to high risk of flooding to the west of the site.	Barratt & David Wilson Homes NW	3/2018/0181 – Reserved matters approved in Feb 2019 for up to 275 dwellings, following granting of outline planning permission 3/2014/0597.	Not suitable. The site has been built out and occupied. West of the site contains areas of moderate to high flood risk.
Land off Henthorn Road, Clitheroe	8.27	270 dwellings	Low risk of flooding. Some areas within the site contain Flood Zone 2 and 3 however no	Taylor Wimpey Manchester & Barratt	3/2013/0035 – Reserved matters approved for up to 270 dwellings in April 2013.	Not suitable. The site has been built out and occupied.

Land North of Pendle Road, Clitheroe

			vulnerable dwellings are proposed / have been built out in these areas.	Homes Manchester	3/2010/0719 – Outline planning permission, appeal decided in March 2012.	
Henthorn Road, Clitheroe	5.2	110 dwellings	Majority of the site is subject to low risk of flooding. Areas within Flood Zone 3 lie to the north east of the site.	Miller Homes	3/2020/0266 – Reserved matters for 110 dwellings approved June 2020. 3/2018/0688 – Outline planning application for 110 dwellings approved June 2019.	Not suitable. The site has been built out and occupied, and does not meet minimum site capacity or area requirements.
Sites identified within the Housing Land Availability Schedule (2013), accompanying the Strategic Housing Land Availability Assessment (Updated 2013)						
Chapel Close, Kingfisher Crescent, Heron Mews & Mallard Row, Clitheroe	1.88	54 dwellings	Site is subject to low risk of flooding. Small pockets of surface water flooding found on site.	Taylor Wimpey Manchester	3/2012/0629 – Reserved matters for 54 dwellings, approved Nov 2012. 3/2011/0247 – Outline permission granted in May 2012 for 54 dwellings.	Not suitable. The site has been built out and occupied, and does not meet minimum site capacity or area requirements.
Land off Milton Road, Clitheroe	1.23	50 dwellings	Site is subject to low risk of flooding.	The Huntroyde Estate	3/2011/0892 – Appeal allowed in Feb 2013 for 50 dwellings.	Not suitable. The site has been built out and occupied, and does not meet minimum site capacity or area requirements.

Land North of Pendle Road, Clitheroe

Land North and West of Littlemoor, Clitheroe	1.75	49 dwellings	Site is subject to low risk of flooding.	R Cornish and A Ferguson – The Standen Estate	3/2015/0805 – Section 73 application to remove and vary planning conditions. Approved Oct 2015. 3/2012/0420 – Outline approved in June 2013 for 49 dwellings.	Not suitable. The site has been built out and occupied, and does not meet minimum site capacity or area requirements.
Primrose Mill Site, Woone Lane, Clitheroe	2.43	78 dwellings	Site is subject to low risk of flooding, however adjoins areas subject to high levels of flood risk to the east of the site.	Miller Homes & Beck Development	3/2012/0394 – Reserved matters for 78 units approved in July 2012. 3/2008/0526P – Outline planning application for a residential development approved March 2010.	Not suitable. The site has been built out and occupied, and does not meet minimum site capacity or area requirements.
Other sites with planning permission granted after the last monitoring report (April 2022 onwards)						
Land West of Preston Road, Longridge (Alston Grange) Phase 3	Phase 3 – 3.6	95 dwellings	Site falls within Flood Zone 1, however some areas are subject to low – high surface water flooding.	Tilia Homes	3/2023/0100 – Full application for 91 dwellings, approved in December 2023. NMA and DOC applications submitted within the past 12 months indicating positive development activity on site.	Not suitable. The site is currently being built out. This particular phase does not have the minimum sizing or capacity requirements either.
Sites on the Open Market						
Nova Primrose Road, Clitheroe, Lancashire BB7 1BS	2.6	1 dwelling	No risk of flooding.	Private Landowner	3/2023/0634 – Full planning permission for single dwelling approved Nov 2023	Not suitable.

Land North of Pendle Road, Clitheroe

The Tyremen 28-30 Parson Lane Clitheroe BB7 2JP	0.02	4 dwellings	No risk of flooding.	Private Landowner	3/2023/0789 – Full planning permission for four apartments approved Feb 2024.	The site does not meet minimum size or residential capacity requirements.
						Not suitable.
						The site does not meet minimum size or residential capacity requirements.
Land adj Black Horse Inn Pimlico Road Clitheroe BB7 4PZ	0.07	7 dwellings	No risk of flooding.	Duffin Investments Ltd	3/2024/0415 – Full planning permission for seven apartments approved Dec 2024.	Not suitable.
						The site does not meet minimum size or residential capacity requirements.
Waddow Hall, Waddington Road, Clitheroe	72	Grade II Listed Hall, two residences and leisure uses present.	Low risk of flooding on site, however part of the site contains land which is subject to high risk of flooding.	Private Landowner	No planning permission	Not suitable.
						The site contains areas at high risk of flooding.

Longridge

Site	Area (Approx. ha)	Capacity	Flood Risk	Ownership	Planning Application Status	Recommendation
Sites with extant planning permissions identified in the HLAS (2022) and updated HLAS (2025)						
Land at Preston Road, Longridge	18.8	256 dwellings	No risk of flooding, however small pockets of surface water flood risk across the site.	Kier Living	3/2022/1170 – NMA to change brick types approved March 2023. 3/2021/0470 – Variation of Condition 1, approved Sept 2021. 3/2018/0105 – Reserved matters approved in May 2018 for 256 dwellings. 3/2016/0974 – Outline planning approval for 275 dwellings in Sept 2017.	Not suitable. Site is currently being built out by several housebuilders (Tilia Homes and Barratt).
Land at Dilworth Lane, Longridge	6.28	195 dwellings	No risk of flooding, however small pockets of surface water flood risk across the site.	Taylor Wimpey UK	3/2015/0688 – Reserved matters approval for 195 dwellings in Nov 2015. 3/2015/0065 – Outline planning permission for 195 dwellings, approved March 2015.	Not suitable. Site is built out and occupied.

Land North of Pendle Road, Clitheroe

Chipping Lane – Phase 1 Longridge	5.35	124 dwellings	No risk of flooding, however small pockets of surface water flood risk across the site.	Barratt David Wilson Trading Limited	3/2018/0404 – Reserved matters approval for 124 dwellings in Sept 2018. 3/2016/0193 – Reserved matters approval for 118 dwellings in Sept 2016. 3/2017/0232 – Variation of outline planning permission, approved June 2017. 3/2014/0764 – Outline planning permission for 363 dwellings, approved October 2015.	Not suitable. Site is built out and occupied.
Land East of Chipping Lane, Longridge Phases 2 & 3	10.5	193 dwellings	No risk of flooding, however small pockets of surface water flood risk across the site.	Barratt David Wilson Trading Limited	3/2018/0975 – Reserved matters for 193 dwellings approved April 2019 3/2017/0232 – Variation of outline planning permission, approved June 2017. 3/2014/0764 – Outline planning permission for 363 dwellings, approved October 2015.	Not suitable. Site is built out and occupied.

Land North of Pendle Road, Clitheroe

Sites identified within the Housing Land Availability Schedule (2013), accompanying the Strategic Housing Land Availability Assessment (Updated 2013)						
Croft Way, Pasture Grove & Meadow Close, Longridge	2.02	49 dwellings	No risk of flooding.	Rowland Homes	3/2011/0541 – Full planning permission for 49 dwellings approved in April 2012.	Not suitable. Site is built out and occupied.
Land at Chapel Hill, Longridge	3.4	53 dwellings	No risk of flooding.	United Utilities Property Services	3/2011/1071 – Full planning permission for 53 dwellings approved in Nov 2012.	Not suitable. Site is built out and occupied.
Land off Preston Road, Longridge	2.35	58 dwellings	No risk of flooding, however small pockets of surface water flood risk across the site.	Grimaldeston Farm Trust & Miller Homes Ltd	3/2014/0590 – Discharge of conditions approved Sept 2014. 3/2013/0307 – Reserved matters application for 58 dwellings approved in Sept 2013.	Not suitable. Site is built out and occupied.

Whalley

Site	Area (Approx. ha)	Capacity	Flood Risk	Ownership	Planning Application Status	Recommendation
Sites with extant planning permissions identified in the HLAS (2022) and updated HLAS (2025)						
Land East of Clitheroe Road, Whalley	10.2	188 dwellings	The site contains a brook which is subject to medium to high flood risk.	THT and LQ Developments LLP	3/2018/0914 – Full planning permission for 188 dwellings approved Sept 2019.	Not suitable. Site is built out in part. The level of flood risk is the same.
Land at Accrington Road, Whalley	2.97	77 dwellings	The site contains medium to high levels of flood risk.	Oakmere Homes	3/2016/0344 – Reserved matters approval for 77 dwellings, approved March 2017. 3/2012/0179 – Outline planning application for 37 dwellings, approved June 2013.	Not suitable. The level of flood risk is the greater than the site. The site does not meet minimum sizing and capacity requirements.
Sites identified within the Housing Land Availability Schedule (2013), accompanying the Strategic Housing Land Availability Assessment (Updated 2013)						
Land east of Clitheroe Road (Lawsonsteads) Whalley	14.6	260 dwellings	The site contains medium to high levels of flood risk.	Commercial Estates Group and multiple housebuilders.	3/2017/0026 – Reserved matters approved in March 2017. 3/2016/0066 – Reserved matters approved in April 2016. 3/2015/0489 – Reserved matters approved Jan 2016.	Not suitable. Site is built out in part. The level of flood risk is the greater than the site.

Land North of Pendle Road, Clitheroe

					3/2014/0043 – Reserved matters approved April 2014. 3/2013/0137 – Outline application for a residential development of up to 260 dwellings, approved Oct 2013. 3/2012/0687 – Outline application for residential and nursing home, approved Nov 2012.	
Land at Mitton Road, Whalley	6.2	116 dwellings	The site contains medium to high levels of flood risk.	David Wilson Homes North West	3/2012/0637 – Full planning permission allowed at appeal, June 2013.	Not suitable. Site is built out. The level of flood risk is the greater than the site.
Land north of Riddings Way, Whalley	2.12	80 dwellings	No risk of flooding, however small pockets of surface water flood risk across the site.	Co-Operative Estates and Bellway Homes.	3/2014/0815 – Reserved matters planning approval for 71 dwellings, approved Feb 2015. 3/2010/0820 – Outline permission allowed at appeal, September 2011.	Not suitable. Site is built out. The level of flood risk is the greater than the site.

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