

AMENDED SEQUENTIAL TEST

Assessment of Additional Clitheroe and Chatburn Sites

Planning application	3/2026/0494
Application site	Twin Brook Barn, Up Brooks, Clitheroe, Lancashire
Proposal	Two-bedroom self-build retirement bungalow
Applicants	Andrew and Adele Thornburn
Document status	Final
Version	1.10
Date	11 August 2026

Purpose of this document

This document updates and supersedes the earlier Sequential Test. It assesses the additional sites identified by Ribble Valley Borough Council, incorporates subsequent planning-register checks, current marketing evidence, site visits and enquiries, and applies the September 2025 national Planning Practice Guidance on the Sequential Test.

Prepared for submission in support of Planning Application 3/2026/0494

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Executive summary

This Amended Sequential Test has been prepared in response to Ribble Valley Borough Council's request that the applicants review the Clitheroe and Chatburn sites contained in the Council's list of small sites with extant planning permissions. It incorporates the earlier searches undertaken by the applicants and the additional Council-supplied information.

The applicants' primary position remains that the Sequential Test is not required if the Local Planning Authority accepts the site-specific evidence under paragraph 175 of the National Planning Policy Framework. The proposed dwelling and identified safe access/escape arrangements have been directed to the lowest-risk part of the application site. That position should be considered together with the submitted Flood Risk Assessment, topographical survey, Environment Agency Product 4 material, flood-mapping review and consultation evidence.

Without prejudice to that primary position, this document applies the Sequential Test on a proportionate basis. The proposal is a single non-major self-build retirement bungalow intended for the applicants' own occupation, not a strategic housing allocation or a speculative open-market development.

Clitheroe is taken as the appropriate primary search area. Chatburn is assessed separately and expressly without prejudice, solely because the Council requested that the identified Chatburn sites also be considered. That additional assessment is not an acceptance that Chatburn forms part of the ordinarily required search area for a non-major housing proposal located in Clitheroe.

The detailed review distinguishes between: existing-building conversions that cannot provide a development plot; active or implemented schemes; larger multi-unit development opportunities with no equivalent individual self-build plot; and the small number of genuinely marketed individual sites that require closer assessment.

The strongest Clitheroe alternatives are Nova at Primrose House, the land opposite Ashbrook on Ribblesdale Avenue, and the marketed seven-apartment development site adjacent to the Black Horse Inn. Nova and the Black Horse land are openly acknowledged as marketed development opportunities; they are not dismissed on ownership or availability alone. Their planning form, land value, scale, timing and ability to meet the same downsizing and ageing-in-place development need are assessed transparently.

On the evidence reviewed, no site has been identified that is both sequentially preferable and realistically capable of meeting the same development need on a comparable timetable. The proportionate Sequential Test is therefore considered satisfied, should the Local Planning Authority conclude that a test is required at all.

1. Purpose and status

1.1 Purpose

This document updates and supersedes the Sequential Test previously submitted in support of Planning Application 3/2026/0494. It provides a single current assessment of the Council-supplied Clitheroe and Chatburn sites, together with relevant alternatives previously identified by the applicants.

1.2 Evidence base

The assessment draws on the Council's small-site permissions spreadsheet, the Ribble Valley Borough Council planning register, current marketing particulars, the applicants' earlier Sequential Test work, site visits and direct enquiries, the approved plans for relevant alternatives, and the flood-risk documents already submitted with the application.

Marketed prices and availability are a snapshot as at 10 August 2026 and may change. Market evidence is used only as contextual evidence of the development opportunity being offered; this document is not a formal valuation.

1.3 Without-prejudice status

The alternative-site assessment is undertaken without prejudice to the applicants' primary paragraph 175 position. The assessment of Chatburn is additionally undertaken without prejudice to the applicants' position that, under the current national guidance for non-major housing in a town, Chatburn does not form part of the ordinarily appropriate search area.

2. Application proposal and development need

2.1 Proposal

Planning permission is sought for a two-bedroom, single-storey self-build retirement bungalow within the residential curtilage of Twin Brook Barn. The dwelling is intended to be constructed and occupied by the applicants as their long-term home.

The proposal has been designed as accessible single-storey accommodation suitable for downsizing, retirement and ageing in place. The existing four-bedroom barn conversion would be sold, leaving the applicants with a smaller home and a more manageable garden.

2.2 Development need

The development need is not simply for any dwelling anywhere in Ribble Valley. It is for accessible, single-level retirement accommodation that allows the applicants to remain within their established Clitheroe service and support network, with practical access to shops, healthcare, public transport and family support while reducing future reliance on the private car.

2.3 Characteristics of a realistic alternative

- capable of providing accessible single-storey or readily adaptable retirement accommodation;
- approximately two bedrooms and a scale consistent with genuine downsizing;
- a manageable plot and garden;
- a location capable of meeting the same Clitheroe-based service and support need;
- a genuine prospect of acquisition and development on a comparable timetable;
- a planning and land-value context compatible with the development need; and
- a lower flood-risk position than the relevant proposed built development and access arrangements.

These characteristics are not treated as a list of personal preferences that every alternative must reproduce exactly. They identify the substantive development need against which a realistic alternative is assessed.

3. National policy and guidance

3.1 National Planning Policy Framework

NPPF paragraphs 173 and 174 require a sequential, risk-based approach to individual applications in areas known to be at risk and seek to steer development to areas with the lowest risk of flooding.

NPPF paragraph 175 – primary position

Paragraph 175 provides an exception where a site-specific Flood Risk Assessment demonstrates that “no built development within the site boundary, including access or escape routes” would be located in an area at flood risk now or in the future. The applicants rely primarily on this provision and on the submitted site-specific evidence.

3.2 Planning Practice Guidance paragraph 027a

Planning Practice Guidance paragraph 027a was revised on 17 September 2025. It says that the search area for an individual application is governed by local circumstances relating to the catchment for the development type and the needs the proposal is intended to address, and that the catchment should be appropriate to the nature and scale of the proposal and the settlement concerned.

For non-major housing in a town or city, the guidance states that the search would not usually extend beyond the specific area of the town or city in which the proposal is located. The alternative wording for a proposal located in a village refers to that village and its immediate neighbouring settlements.

National guidance – proportionality

“The sequential test should be applied proportionately, focusing on realistic alternatives in areas of lower flood risk that could meet the same development need.”

3.3 Planning Practice Guidance paragraph 028

Paragraph 028 explains that a site is reasonably available where its location is suitable for the type of development proposed, it can meet the same development needs, and it has a reasonable prospect of being developed at approximately the same time. An alternative does not have to be owned by the applicant.

3.4 Consequences for this assessment

The Council's list of extant permissions is therefore an important source of information, but an extant permission is not automatically a realistic alternative. The current status, development form, availability, timing, flood-risk preference and ability to meet the same development need must be considered.

3.5 Age of EA Model Terrain Data and Site-Specific Evidence

The Environment Agency has confirmed in writing the age and source of the information underlying the Flood Map for Planning at the application site:

“I can confirm that the hydraulic model that we hold for the Main River Mearley Brook is the 2018 Mearley Brook model. The Flood Zones on the Flood Map for Planning are currently informed by this model. The river channel survey used in the model was acquired in June/July 2016. The ground level/terrain information used in the 2018 model in this immediate area is from 2006.”

This confirmation is significant because, although the hydraulic model is identified as the 2018 Mearley Brook model, the ground level and terrain information used for the immediate area of the application site dates from **2006**.

The application is supported by a detailed site-specific topographical survey undertaken in **March 2026**, providing current surveyed ground levels approximately twenty years newer than the terrain information incorporated within the Environment Agency model.

The applicant does not dispute the Environment Agency's modelled flood levels. Rather, the current topographical survey enables those modelled flood levels to be compared with the **actual existing ground levels** across the application site. This provides more current and site-specific evidence when considering whether the proposed dwelling and its safe access and escape routes would be at risk of flooding.

The submitted Flood Risk Assessment and March 2026 topographical survey demonstrate that the proposed dwelling and its safe access and escape routes are located on the higher part of the site and above the relevant modelled flood levels, including the assessment of future flood risk and climate change.

This evidence is directly relevant to **paragraph 175 of the NPPF**, which provides an exemption from the Sequential Test where a site-specific Flood Risk Assessment demonstrates that the built development, access or escape routes and other potentially vulnerable elements would not be located in an area at risk of flooding now or in the future.

The alternative-site assessment which follows has nevertheless been undertaken on a proportionate basis and without prejudice to the applicant's position that paragraph 175 is engaged on the basis of the submitted site-specific flood-risk evidence.

4. Appropriate geographical area of search

4.1 Clitheroe as the primary search area

The application is located in Clitheroe. It is a single non-major housing proposal intended to meet an identified retirement and ageing-in-place need based in Clitheroe. Applying paragraph 027a proportionately, Clitheroe is therefore adopted as the primary area of search.

This is a settlement- and development-need-based approach; it is not defined by the applicants' landownership. The assessment expressly includes land owned by others and sites on the open market.

4.2 Chatburn – assessed without prejudice

Ribble Valley Borough Council has specifically asked the applicants to consider the Chatburn entries in its small-site list. Those sites are therefore assessed below as an additional precautionary exercise.

Without-prejudice position on Chatburn

The inclusion of Chatburn does not amount to acceptance that it forms part of the ordinarily required search area. The applicants maintain that, for a non-major housing proposal located in the town of Clitheroe, the national guidance supports a Clitheroe-focused search. The Chatburn sites are nevertheless assessed fully so that the Council can determine the application on the most complete evidence.

The applicants do not contend that Chatburn is inherently unsustainable. The relevant distinction is whether a particular Chatburn site can meet the same Clitheroe-based accessibility, support and ageing-in-place need as the application proposal.

5. Methodology and assessment criteria

5.1 Sources

- Ribble Valley Borough Council spreadsheet 'Small site extant permissions', supplied August 2026;
- Ribble Valley Borough Council online planning register and decision documents;
- current Rightmove and agent marketing particulars for Nova, the Black Horse development land and Grindleton View;
- Armistead Barnett particulars for 11 Old Road, Chatburn;
- approved Grindleton View plans and site section;
- the applicants' email and follow-up enquiry to Stanton Andrews regarding Ribblesdale Avenue and the site-visit note of the conversation with the occupier of Ashbrook;
- Environment Agency Flood Map for Planning / climate-change mapping and the submitted flood-risk evidence; and
- the applicants' earlier market and planning searches.

5.2 Two-stage approach

Stage 1 screens out entries that plainly cannot provide an alternative development plot, such as conversions of existing buildings, changes of use, HMOs and listed-building alterations. Stage 2 assesses marketed plots, individual dwelling permissions, multi-unit development opportunities and any site that could superficially appear capable of meeting the development need.

5.3 Evidence standard

No site is discounted merely because it is not owned by the applicants. Conversely, the existence of planning permission is not treated as proof that a plot is genuinely available or capable of delivering the same development need at approximately the same time.

Where a site is marketed, that fact is expressly acknowledged. The assessment then considers what development opportunity is actually being offered and whether it is a realistic alternative for the proposal under paragraph 028.

6. Council-supplied sites: screening schedule

Site / application	Current nature / status	Sequential Test position	Outcome
Former garages, Back Brennand Street, Clitheroe 3/2022/0136	Internal remodelling, replacement roof, limited demolition and extension to create two one-bedroom apartments; work is in progress.	Existing-building conversion already being implemented. Not an alternative building plot.	Screen out
Post Office, 1–3 Bridge Road, Chatburn 3/2022/0465	Conversion of existing premises to two one-bedroom flats.	Existing-building conversion; no bungalow plot. Chatburn considered without prejudice.	Screen out
Black Horse Inn, Pimlico Road, Clitheroe 3/2022/0148	Change of use and extension of the existing inn to six residential dwellings with landscaping and parking.	Conversion/extension of an existing building, not a separate development plot.	Screen out
Land off Clough Bank Lane, Chatburn 3/2022/1005	Permission for two dwellings and garages. Clough Bank is the only vehicular access to the site and the Environment Agency Flood Map for Planning shows that route passing through Flood Zone 3.	Whole-site scheme with no separately marketed individual plot; the only vehicular access passes through Flood Zone 3, so the site is not clearly sequentially preferable. Chatburn assessed without prejudice.	Detailed

Site / application	Current nature / status	Sequential Test position	Outcome
Land opposite Ashbrook, Ribblesdale Avenue, Clitheroe 3/2022/0990; 3/2025/0869	2025 permission approved for a detached dwelling. Application renewed to keep the development position live.	No marketing identified; enquiries have not established a reasonable prospect of acquisition and local information indicates owner intends to develop.	Detailed
43A Moor Lane, Clitheroe 3/2024/0932	Prior notification for change of use from commercial to dwelling.	Existing-building change of use; no development plot.	Screen out
Nova, Primrose House, Primrose Road, Clitheroe 3/2023/0634	Marketed 0.58-acre plot with full permission for a substantial single-storey self-build family home; OIRO £300,000.	Available and in Clitheroe; requires full same-need, plot-management, planning and timing assessment.	Detailed
Land adjacent to 9 / 11 Old Road, Chatburn 3/2021/1153; 3/2023/0866	Five-bedroom, three-storey dwelling of about 3,068 sq ft; construction has begun; marketed as completed home at £845,000.	No longer an undeveloped plot. Chatburn considered without prejudice.	Detailed
The Tyreman, 28–30 Parson Lane, Clitheroe 3/2023/0789	Four-dwelling developer-led scheme; work has begun.	Active multi-unit development; no equivalent individual self-build plot.	Screen out
34 York Street, Clitheroe 3/2024/0071	Change of use from Class E hairdressers to two residential dwellings (C3).	Existing-building change of use; no development plot.	Screen out
16–18 Lowergate, Clitheroe 3/2024/0363	Conversion/change of use of existing premises to three one-bedroom dwellings.	Existing-building scheme; no bungalow plot.	Screen out
Land adjacent to Black Horse Inn, Pimlico Road, Clitheroe 3/2024/0415	Marketed at £325,000 with full permission for a block of seven apartments and associated parking.	Available as a whole higher-density development opportunity, not as an equivalent self-build plot; detailed same-need/timing assessment required.	Detailed
3 Church Street, Clitheroe 3/2025/0231	HMO/commercial development within an existing town-centre building.	Existing-building scheme; no alternative bungalow plot.	Screen out
33 Castle Street, Clitheroe 3/2025/0701	Listed Building Consent for subdivision of shop premises to provide living accommodation on first and second floors for a letting apartment.	Existing listed-building alteration; no development plot.	Screen out
45–47 Whalley Road, Clitheroe 3/2025/0564; 3/2025/0565	Residential/commercial change of use and alterations to an existing building.	Existing-building conversion; no bungalow plot.	Screen out
Honfleur / 3 Grindleton View, Chatburn 3/2025/0878	Marketed building plot with full permission for a substantial split-level self-build dwelling; currently OIRO £295,000.	Available, but topography, split-level form, scale and location require detailed same-need assessment. Chatburn without prejudice.	Detailed
Land at Woone Lane, Clitheroe 3/2026/0052	Permission in Principle for up to nine dwellings; applicant Beck Homes (UK) Ltd; site partly in Flood Zone 3.	Developer-controlled multi-unit opportunity, no identified individual plot, and only in-principle consent.	Detailed
19 Pendle Road, Clitheroe 3/2026/0020	Proposed change of use from dwelling (C3) to furnished short-term accommodation.	Existing dwelling/change of use; not an alternative development plot.	Screen out
Kendal House, 24 Chatburn Road, Clitheroe 3/2026/0250	Prior approval for change of use of osteopath clinic (Class E(e)) to dwelling (C3) under Class MA.	Existing-building change of use; not a development plot.	Screen out

7. Detailed assessment of potentially relevant alternatives

The detailed assessments below deliberately acknowledge the strengths of each alternative where appropriate. A marketed site is not described as unavailable, and a lower-risk site is not rejected merely because the approved design differs from the applicants' preferred design. The question is whether it is a realistic, reasonably available and sequentially preferable alternative capable of meeting the same development need.

7.1 Twin Brook Farm / Upbrooks, Clitheroe – 3/2019/1103

This adjoining site has permission for two detached family dwellings and has been marketed as a development opportunity. It is therefore treated as potentially available.

The decisive Sequential Test issue is flood-risk preference. The site lies within Flood Zone 3 and is not at lower flood risk than the proposed dwelling and identified safe access/escape arrangements at Twin Brook Barn, which are positioned in Flood Zone 1.

Conclusion: Not sequentially preferable; it is not a qualifying lower-risk alternative.

7.2 Land adjacent to 115 Kemple View, Clitheroe – 3/2022/1039

This site was cited in the delegated report for the applicants' earlier refused application as an example of a potential alternative. The application was subsequently refused and did not create an implementable residential permission.

No current evidence has been identified of an independently marketed and deliverable residential plot. The site therefore does not provide an established reasonably available alternative.

Conclusion: Not an established reasonably available alternative.

7.3 Nova, Primrose House, Primrose Road, Clitheroe – 3/2023/0634

Nova is the most directly relevant Clitheroe alternative identified. It is currently marketed at offers in the region of £300,000. The particulars describe approximately 0.58 acres with full planning permission, granted on 29 November 2023, for a contemporary single-storey self-build dwelling with car port and landscaping. The permission is stated to be in the process of being renewed. The land is offered freehold with vacant possession.

Location and availability: Nova is within Clitheroe and is available on the open market. Those points are expressly acknowledged and are not relied upon as reasons for exclusion.

Development form and same need: The approved floor plan is for a substantial three-bedroom bespoke family home and includes an office, piano room and indoor pool with changing/wet area. This is materially different from the intended two-bedroom downsizing outcome. A smaller accessible retirement bungalow would require a different planning proposal and cannot be assumed to follow automatically from the current permission.

Plot management: The plot extends to approximately 0.58 acres. That is materially larger than the manageable curtilage sought for ageing in place. A smaller curtilage would depend on subdivision or a materially revised layout and cannot be assumed as an existing available planning outcome.

Market context: Current evidence for new-build two-bedroom over-55 bungalows at Half Penny Meadows, Clitheroe, places this type of downsizing accommodation broadly around £270,000–£278,000. Those properties are much smaller than the applicants' proposed bungalow and are not relied upon as direct valuation comparables. They nevertheless provide useful context: Nova's land price alone reflects the development value of a substantially larger bespoke family-home opportunity rather than a conventional two-bedroom retirement dwelling.

Timing: A materially different retirement bungalow would require a revised or fresh planning process, adding uncertainty and time compared with the application proposal already before the Council.

Conclusion: Nova is genuinely marketed, appropriately located and potentially lower-risk, but the evidence does not show it to be a realistic alternative capable of meeting the same downsizing, manageable-plot and ageing-in-place development need on a comparable planning timetable. The conclusion does not depend on personal affordability.

7.4 Land opposite Ashbrook, Ribblesdale Avenue, Clitheroe – 3/2022/0990 and 3/2025/0869

Application 3/2025/0869 was approved with conditions on 24 November 2025 for a detached dwelling. Stanton Andrews Architects act as agent. Stanton Andrews confirmed to the applicants that the application had been renewed in order to keep the development position live.

Availability enquiries: The applicants asked Stanton Andrews to confirm whether the site was available and to clarify the owners' intentions. On 11 August 2026, Henry Cahill RIBA of Stanton Andrews replied that they were struggling to contact their clients and stated: "As far as we're aware they are not interested in making the site available."

A site visit was also undertaken. The occupier of Ashbrook advised that the land had historically formed part of the garden of Ashbrook, had been left to the present owner, and that his understanding was that the owner intends to develop the site. He did not hold contact details for the owner.

Conclusion: The site has an implementable planning position, but is not demonstrated to be reasonably available. Stanton Andrews' written response states that, as far as the agent is aware, the owners are not interested in making it available. On the present evidence it is not a realistic, reasonably available alternative on a comparable timetable.

7.5 Land adjacent to Black Horse Inn, Pimlico Road, Clitheroe – 3/2024/0415

This land is currently marketed at £325,000 with full detailed planning permission for a block of seven apartments and associated parking. The marketing information gives an overall site area of approximately 741 m² (about 0.19 acres) and an approved building footprint of approximately 135 m².

Availability: The site is acknowledged to be available as a whole development opportunity. It is not excluded merely because it is owned by another party.

Same development need and planning form: What is offered for sale is the development value of a seven-apartment scheme, not an individual self-build retirement plot. Delivering one two-bedroom accessible bungalow instead would require abandoning the higher-density approved scheme and obtaining a materially different planning permission.

Market context: The £325,000 land price is above the current asking prices of the new-build two-bedroom retirement bungalows identified at Half Penny Meadows. Those bungalows are not direct valuation comparables, but the contrast supports the observation that the land is priced as a multi-unit development opportunity rather than for the same retirement development need.

Timing: A single retirement bungalow on this site is not an approved development outcome. A new planning application would therefore be required, introducing material planning and timing uncertainty.

Conclusion: Although marketed and available as a whole development site, it is not a realistic same-need alternative on the present evidence. The available opportunity is a seven-apartment development scheme at a land value reflecting that permission, not an equivalent individual retirement plot.

7.6 Land adjacent to 9 / 11 Old Road, Chatburn – 3/2021/1153 and 3/2023/0866 (without prejudice)

The earlier permission included basement accommodation; the later scheme is a substantial five-bedroom dwelling. Current Armistead Barnett particulars confirm that construction has begun and that the property is being marketed as a completed five-bedroom home rather than as an undeveloped plot.

The particulars describe approximately 3,068 sq ft (about 285 m²) over three storeys on approximately 0.24 acres, at a guide price of £845,000. Vacant possession is offered upon completion.

The site has therefore ceased to be an available undeveloped plot on which the applicants could simply construct their retirement bungalow. It is also materially different in scale, level arrangement and development need.

Conclusion: Without prejudice to the search-area position, Old Road is not a reasonably available alternative development site. Construction is underway and the marketed product is the completed substantial family dwelling.

7.7 Honfleur / 3 Grindleton View, Chatburn – 3/2025/0878 (without prejudice)

This plot is currently marketed and is therefore expressly accepted as available. The current asking price is offers in the region of £295,000. Full planning permission relates to a substantial self-build dwelling.

Scale: Current particulars give an approximate gross internal area of 286.11 m² excluding the garage and 338.25 m² including it. This is substantially larger than the applicants' approximately 150 m² retirement bungalow.

Topography and accessibility: The approved site section shows the new access rising from Sawley Road at approximately 5 degrees and retaining works associated with the level change. The approved dwelling responds to the site by distributing accommodation over different levels. The lower level includes the garage together with a bedroom, en-suite and ancillary accommodation; the principal lounge, kitchen, sitting and dining accommodation is on the upper level. Internal stairs are therefore integral to the approved arrangement.

This is materially different from the development need for accessible single-storey accommodation suitable for ageing in place. Providing a genuinely single-level retirement dwelling with substantially level access would require a materially different design response to the site, potentially involving different earthworks and retaining structures and a fresh planning assessment.

Location: The site is in Chatburn rather than Clitheroe and does not provide equivalent pedestrian access to the applicants' established Clitheroe service and support network.

Conclusion: The site is genuinely available, but it does not provide a realistic same-need alternative. Its topography has produced a split-level development solution, the approved accommodation is substantially larger than required, and it is outside the primary Clitheroe search area. This assessment is made without prejudice to the applicants' position that Chatburn is not ordinarily required by paragraph 027a.

7.8 Land off Clough Bank Lane, Chatburn – 3/2022/1005 (without prejudice)

Permission was granted for two new dwellings and garages as a whole development scheme. No evidence has been identified that either plot is separately marketed as an independent self-build opportunity.

Flood-risk preference: Clough Bank is the only vehicular access to the development. The Environment Agency Flood Map for Planning shows the access route passing through Flood Zone 3 before reaching the site.

Accordingly, even if the dwelling plots themselves are on lower-risk land, the development as a whole does not provide a clearly lower-risk alternative when access and escape are considered. This differs materially from the Twin Brook Barn proposal, where the proposed dwelling and identified safe access/escape route are in Flood Zone 1 (see Appendix A7).

The permission is also for a two-dwelling scheme. Replacing one element with a different retirement bungalow would require separate availability, infrastructure and planning arrangements that have not been demonstrated.

Conclusion: Without prejudice to the search-area position, the site is not shown to be a reasonably available or clearly sequentially preferable alternative.

7.9 Land at Woone Lane, Clitheroe – 3/2026/0052

The application is Permission in Principle for residential development of up to nine dwellings. The applicant is Beck Homes (UK) Ltd. The land is developer-controlled and is being advanced as a multi-unit development opportunity. Permission in Principle does not identify an approved individual plot, detailed dwelling layout, access, drainage or technical arrangement capable of accommodating the applicants' proposed bungalow. No separately marketed self-build plot has been identified.

Flood-risk position: The Council's delegated report records that the site partially lies within Flood Zones 2 and 3, with a small area at risk from surface water flooding, and that the proposed dwellings and access routes are at risk of flooding. It also confirms that a Flood Risk Assessment inclusive of the Sequential Test would need to be submitted at Technical Details stage. The Permission in Principle therefore does not establish an identified dwelling plot or access route at lower flood risk than the Twin Brook Barn proposal.

Conclusion: The current planning position does not provide a reasonably available individual alternative capable of meeting the same development need on a comparable timetable, nor does the Permission in Principle establish an identified dwelling and access arrangement at lower flood risk.

7.10 Other conversion and implemented sites

The remaining Council entries are not development plots capable of accommodating the proposed bungalow. They are existing-building changes of use/conversions, listed-building works, or schemes already being implemented. They can therefore be screened out without an artificial exercise in ownership or market valuation.

- 3/2022/0136, Back Brennand Street – conversion/remodelling to two one-bedroom apartments; work in progress;
- 3/2022/0465, Post Office, Chatburn – existing-building conversion to flats;
- 3/2022/0148, Black Horse Inn – change of use and extension of the existing inn to six dwellings;
- 3/2024/0932, 43A Moor Lane – commercial-to-residential prior notification;
- 3/2023/0789, The Tyreman – four-dwelling scheme with work begun;
- 3/2024/0071, 34 York Street – change of use of existing Class E premises to two dwellings;
- 3/2024/0363, 16–18 Lowergate – existing-building conversion to three one-bedroom dwellings;
- 3/2025/0231, 3 Church Street – HMO/commercial works within an existing building;
- 3/2025/0701, 33 Castle Street – Listed Building Consent for subdivision of shop premises to provide a letting apartment;
- 3/2025/0564 and 0565, 45–47 Whalley Road – mixed residential/commercial conversion of an existing building;
- 3/2026/0020, 19 Pendle Road – change of use of an existing dwelling to furnished short-term accommodation; and
- 3/2026/0250, Kendal House – Class MA prior approval to change an osteopath clinic to a dwelling.

8. Market context and deliverability

8.1 Purpose

Market evidence is not used to show that the applicants personally cannot afford an alternative. Personal affordability is not the test. It is used only to understand whether the land/development opportunity being marketed is objectively aligned with the type and scale of development need under consideration.

8.2 Current Clitheroe retirement-bungalow context

A current market check identified new-build two-bedroom over-55 bungalows at Half Penny Meadows, Pendle Road, Clitheroe, broadly around £270,000–£278,000. Taylor Wimpey currently lists the two-bedroom 'Pendleton' at £272,995 for Plot 302 and other Pendleton plots at around £269,995. The Pendleton is about 721 sq ft (67 m²), so it is materially smaller than the applicants' proposed bungalow and is not a direct valuation comparable.

The evidence is therefore used cautiously. It demonstrates the broad market context for purpose-built two-bedroom downsizing accommodation in Clitheroe; it does not establish a formal value for the application proposal.

8.3 Development-value mismatch

The marketed alternatives illustrate a recurring mismatch. Nova is offered at about £300,000 for 0.58 acres with permission for a substantial bespoke family home. The Black Horse land is offered at £325,000 with permission for seven apartments. Those prices reflect the development potential attached to the respective permissions.

If those permissions are implemented, the resulting development does not meet the applicants' two-bedroom downsizing and ageing-in-place need. If a materially smaller retirement bungalow is pursued instead, a fresh or revised planning outcome is required and the purchaser is acquiring development value that is not part of the same development need.

No formal residual valuation is relied upon. The market evidence is supporting context for the paragraph 028 assessment of same development need and comparable timing.

9. Overall assessment and conclusion

9.1 Primary paragraph 175 position

The applicants' primary position remains that the Sequential Test is not required because the site-specific evidence demonstrates that the proposed dwelling, identified safe access/escape arrangements and other vulnerable built elements are directed away from areas at risk now and in the future. That issue should be determined by reference to the submitted Flood Risk Assessment and supporting technical evidence.

9.2 Alternative Sequential Test position

If the Local Planning Authority nevertheless concludes that a Sequential Test is required, Clitheroe is the appropriate primary search area under the September 2025 guidance. Chatburn has been assessed additionally and without prejudice because the Council expressly requested it.

The Council's spreadsheet does not demonstrate that every extant residential permission is a realistic alternative. Most entries are conversions, changes of use, implemented schemes or multi-unit development opportunities that do not provide an equivalent individual retirement plot.

The genuinely relevant alternatives have been assessed on their merits. Twin Brook Farm is not sequentially preferable because it is in Flood Zone 3. Kemple View was refused. Ribblesdale Avenue has not been shown to be reasonably available despite direct enquiries. Nova and the Black Horse land are marketed, but what is available is development value for materially different schemes, and a retirement bungalow would require a different planning outcome. Grindleton View is marketed but its topography and approved split-level form do not meet the same accessible ageing-in-place need; it is also in Chatburn. Old Road is already under construction as a substantial family home. Clough Bank Lane has access/escape through Flood Zone 3. Woone Lane is a developer-controlled Permission in Principle for up to nine dwellings, not an identified individual retirement plot.

9.3 Sequential Test conclusion

On the evidence reviewed, no site has been identified that is simultaneously:

- at lower flood risk than the relevant proposed built development and access arrangements;
- suitably located for the development type and needs being addressed;
- capable of meeting the same downsizing, accessibility, ageing-in-place and Clitheroe-support need;
- reasonably available as a realistic development opportunity rather than a theoretical subdivision or materially different scheme; and
- reasonably capable of delivery at approximately the same time.

Conclusion

Should the Local Planning Authority determine that a Sequential Test is required, the applicants consider that the proportionate test is satisfied. No realistic, reasonably available and sequentially preferable alternative capable of meeting the same development need has been identified.

9.4 Request for engagement

If the Local Planning Authority considers that any identified site is separately available, should be assessed on materially different evidence, or is capable of meeting the same development need at lower flood risk, the applicants respectfully request that the specific site and supporting evidence be identified before determination so that it can be investigated and addressed.

9.5 Relationship to the Overall Planning Balance

The applicant acknowledges that the Council's housing land supply position is not a consideration in determining whether the Sequential Test itself is passed. Planning Practice Guidance expressly states that the absence of a five-year housing land supply is not relevant to the application of the Sequential Test, although housing considerations, including housing land supply, may subsequently be relevant in the overall planning balance alongside the outcome of that test.

For completeness, Ribble Valley Borough Council has acknowledged in its own recent appeal evidence that, following the Inspector's decision of 7 January 2026, the Council cannot demonstrate a five-year supply of deliverable housing land, with the supply assessed at 3.45 years. The Council consequently accepts that paragraph 11(d) of the National Planning Policy Framework is engaged.

Accordingly, if the Local Planning Authority concludes that the proposed development satisfies the relevant national flood-risk policies, including through the outcome of this Sequential Test, the proposal should subsequently be considered within the paragraph 11(d) planning balance. Paragraph 11(d) provides for permission to be granted unless the application of policies protecting areas or assets of particular importance provides a strong reason for refusal, or the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.

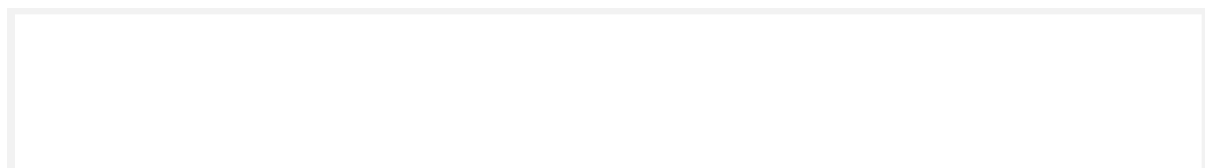
Appendix A – Evidence schedule

Ref	Evidence
A1	Ribble Valley Borough Council 'Small site extant permissions' spreadsheet – Clitheroe and Chatburn entries.

Ref	Evidence
A2	RVBC planning-register printouts / decision notices for the detailed sites.
A3	Current marketing particulars: Nova, Primrose Road; land adjacent to Black Horse Inn, Pimlico Road; Grindleton View, Chatburn.
A4	Armistead Barnett brochure for 11 Old Road, Chatburn, confirming construction commenced and marketing of completed dwelling.
A5	Approved Grindleton View site plan, floor plans/elevations and site/drive section showing the level change and split-level arrangement.
A6	Applicant email/follow-up to Stanton Andrews regarding Ribblesdale Avenue, together with dated site-visit note of the conversation with the occupier of Ashbrook.
A7	Environment Agency mapping / relevant extract for Clough Bank Lane showing the access/escape route through Flood Zone 3.
A8	Current market evidence for two-bedroom over-55 bungalows at Half Penny Meadows, Clitheroe.
A9	Submitted Flood Risk Assessment, March 2026 topographical survey, Environment Agency Product 4 information and application drawings for 3/2026/0494.

Appendix B – References

- Ministry of Housing, Communities and Local Government, National Planning Policy Framework, paragraphs 173–175 (current adopted version).
- Planning Practice Guidance, 'Flood risk and coastal change', paragraphs 027, 027a, 028 and 029; paragraphs 027a and 028 revised 17 September 2025.
- Environment Agency / GOV.UK, National flood risk standing advice for local planning authorities.
- Ribble Valley Borough Council planning register, applications referred to in sections 6 and 7 (checked August 2026).
- P Wilson & Company / Rightmove marketing particulars, Nova, Primrose Road, Clitheroe (checked 10 August 2026).
- Duffin's Estate Agents / Rightmove marketing particulars, Pimlico Road development land, application 3/2024/0415 (checked 10 August 2026).
- Athertons / Rightmove marketing particulars, Grindleton View, Chatburn, application 3/2025/0878 (checked 10 August 2026).
- Taylor Wimpey / Rightmove, Half Penny Meadows, Clitheroe, two-bedroom over-55 bungalow marketing evidence (checked 10 August 2026).
- Armistead Barnett, 11 Old Road, Chatburn sales brochure.
- Sunderland Peacock & Associates drawing 5765-P02 Rev B, Proposed Ground Floor Plan and Elevations, Twin Brook Barn.



APPENDIX DOCUMENTS

The following pages assemble the principal evidence presently available for the Amended Sequential Test. Where the Local Planning Authority already holds a document on its planning register or within Planning Application 3/2026/0494, the evidence is identified rather than unnecessarily duplicated.

A1 - Ribble Valley Borough Council small-site permissions list

Source: spreadsheet supplied by Lyndsey Hayes, Ribble Valley Borough Council, 4 August 2026. The extract below reproduces the Clitheroe and Chatburn entries relevant to this Sequential Test.

Site	Parish	Application	Type	Granted	Expiry	Extant
Former garages, Back Brennand Street, Clitheroe, BB7 2HB (HS70)	Clitheroe	3/2022/0136	Full	20/04/2022	20/04/2025	2
Post Office 1-3 Bridge Road, Chatburn, Clitheroe, BB7 4AW (HS75)	Chatburn	3/2022/0465	Full	12/08/2022	12/08/2025	1
Black Horse Inn, Pimlico Road, Clitheroe, BB7 4PZ (HS76)	Clitheroe	3/2022/0148	Full	30/08/2022	30/08/2025	6
Land off Clough Bank Lane, Chatburn, Clitheroe, BB7 4AW (HS80)	Chatburn	3/2022/1005	Full	08/12/2022	08/12/2025	2
Land opposite Ashbrook, Ribblesdale Avenue, Clitheroe, BB7 2HZ (HS81)	Clitheroe	3/2025/0869, 3/2022/0990	Full, Full	24/11/2025	24/11/2028	1
43A Moor Lane, Clitheroe, BB7 1BE (HS90)	Clitheroe	3/2024/0932	Prior notification	10/12/2024	10/12/2027	2
Primrose House, Primrose Road, Clitheroe, BB7 1DR (HS97)	Clitheroe	3/2023/0634	Full	29/11/2023	29/11/2026	1
Land adj. to No. 9 Old Road, Chatburn, Clitheroe, BB7 4AB (HS100)	Chatburn	3/2023/0866, 3/2021/1153	Full, Full	10/05/2024	10/05/2027	1
The Tyreman, 28-30 Parson Lane, Clitheroe, BB7 2JP (HS104)	Clitheroe	3/2023/0789	Full	08/02/2024	08/02/2027	4
34 York Street, Clitheroe, BB7 2DL (HS106)	Clitheroe	3/2024/0071	Full	08/03/2024	08/03/2027	2
16-18 Lowergate, Clitheroe, BB7 1AD (HS113)	Clitheroe	3/2024/0363	Full	28/06/2024	28/06/2027	3
Land adjacent to Black Horse Inn, Pimlico Road, Clitheroe, BB7 4PZ (HS121)	Clitheroe	3/2024/0415	Full	06/12/2024	06/12/2027	7
3 Church Street, Clitheroe, BB7 2DD (HS129)	Clitheroe	3/2025/0231	Full	10/10/2025	10/10/2028	1
33 Castle Street, Clitheroe, BB7 2BT (HS130)	Clitheroe	3/2025/0701	Listed Building	10/10/2025	10/10/2028	1
45-47 Whalley Road, Clitheroe, BB7 1EE (HS134)	Clitheroe	3/2025/0564, 3/2025/0565	Full, Listed Building	03/02/2026	03/02/2029	5
Honfleur 3 Grindleton View, Chatburn, Clitheroe, BB7 4BE (HS136)	Chatburn	3/2025/0878	Full	11/02/2026	11/02/2029	1
Land at Woone Lane, Clitheroe, BB7 1BJ (HS139)	Clitheroe	3/2026/0052	Permission in Principal	25/02/2026	25/02/2029	9
19 Pendle Road Clitheroe BB7 1JQ	Clitheroe	3/2026/0020	Full	13/01/2026	13/01/2029	-1
Kendal House 24 Chatburn Road Clitheroe BB7 2AP	Clitheroe	3/2026/0250	Prior approval	23/06/2026	23/06/2029	1

A2 - Ribble Valley planning-register evidence

The application descriptions and decision status used in the screening schedule were checked against the Ribble Valley Borough Council planning register. The Council is the custodian of those records and can access the full decision notices and approved documents directly.

- 3/2019/1103 - Twin Brook Farm / Upbrooks
- 3/2022/1039 - Land adjacent to 115 Kemple View
- 3/2023/0634 - Nova, Primrose House
- 3/2022/0990 and 3/2025/0869 - Land opposite Ashbrook, Ribblesdale Avenue
- 3/2021/1153 and 3/2023/0866 - Land adjacent to 9 / 11 Old Road, Chatburn
- 3/2025/0878 - Honfleur / 3 Grindleton View, Chatburn
- 3/2022/1005 - Land off Clough Bank Lane, Chatburn
- 3/2024/0415 - Land adjacent to Black Horse Inn
- 3/2026/0052 - Land at Woone Lane

A3 - Current marketing evidence

The following summaries record the current open-market evidence checked on 10 August 2026. They establish availability and the nature of the development opportunity being marketed; they are not formal valuations.

Site	Price	Marketing description	Agent/source	Web reference
Nova, Primrose Road, Clitheroe	£300,000 offers in region of	Approx. 0.58 acres with full planning permission for one contemporary single-storey dwelling.	P Wilson & Company / Rightmove	https://www.rightmove.co.uk/commercial-property-for-sale/Lincoln-Way-Ind-Est/land.html
Land adjacent to Black Horse Inn / Pimlico Road, Clitheroe	£325,000	Development opportunity with full planning permission for seven apartments.	Duffin's Estate Agents / Rightmove	https://www.rightmove.co.uk/properties/154714658
Grindleton View, Chatburn	£295,000	Building plot with full planning permission; marketed as development potential.	Athertons / Rightmove	https://www.rightmove.co.uk/commercial-property-for-sale/BB7.html

A4 - 11 Old Road, Chatburn: sales-particulars evidence

The evidence relied upon for this site is summarised here rather than reproducing eight pages of third-party sales particulars. The original Armistead Barnett brochure should be retained with the application evidence if required by the Local Planning Authority.

Material facts recorded in the sales particulars

- The marketed product is a five-bedroom dwelling extending to approximately 3,068 sq ft (about 285 m²).
- Accommodation is arranged over three storeys.
- The guide price recorded in the brochure is £845,000.
- Construction has begun, so the opportunity is no longer an undeveloped building plot.

These facts are the basis for section 7.6 of the Sequential Test. The document does not rely on personal affordability; the relevance is that the currently marketed product is a completed substantial family dwelling rather than a reasonably available undeveloped plot for the proposed retirement bungalow.

Source / evidence reference

Armistead Barnett sales particulars for 11 Old Road, Chatburn, as supplied/reviewed for this Sequential Test.

A5 - Grindleton View approved plans and site section

The approved drawings are referenced rather than reproduced here. They remain available on the Ribble Valley Borough Council planning register under application 3/2025/0878.

Relevant features of the approved scheme

- The approved dwelling is substantially larger than the applicants' proposed retirement bungalow.
- The approved site section shows the new access rising from Sawley Road at approximately 5 degrees, together with retaining works associated with the level change.
- The approved accommodation is split across levels: the lower level includes the garage, a bedroom, en-suite and ancillary accommodation, while the principal lounge, kitchen, sitting and dining accommodation is on the upper level.
- Internal stairs are therefore integral to the approved arrangement.

The drawings are relied upon only to demonstrate the objective relationship between the site topography and the split-level form considered in section 7.7.

Source / evidence reference

RVBC planning application 3/2025/0878 - "Proposed Site Plan Floor Plans Elevations and Street View" and "Proposed Site Section and Visibility Splay Plan".

Official application page: <https://webportal.ribblevalley.gov.uk/planningApplication/37965>

A6 - Ribblesdale Avenue availability enquiries

A6.1 - Follow-up email sent to Stanton Andrews on 10 August 2026

To: mail@stantonandrews.co.uk
Subject: Ribblesdale Avenue 3/2025/0869

Dear Stanton Andrews,

I am just following up regarding the site on Ribblesdale Avenue, Clitheroe, which I recently visited and discussed with you.

I would be grateful if you could confirm that I attended to enquire about the site and its availability.

You mentioned that you would contact the owners to establish their current intentions for the site. Have you received any further information from them as to whether they intend to sell the site, develop it themselves, or otherwise make it available?

I am currently considering potential alternative sites as part of a planning application sequential test, so a brief confirmation of the present position would be very helpful.

Many thanks for your assistance.

Kind regards,

Andrew Thornburn

A6.2 - Site-visit note

The applicant reported speaking to the occupier of Ashbrook. The occupier advised that the land had historically formed part of the garden of Ashbrook, had been left to the present owner, and that his understanding was that the owner intends to develop the land. He did not have contact details for the owner.

This account is recorded as supporting information only and is not treated as conclusive evidence of the owner's intentions.

A6.3 - Response from Stanton Andrews received 11 August 2026

From: Henry Cahill RIBA, Architect, for and on behalf of Stanton Andrews Ltd

Andrew,

We're struggling to get in touch, we assume the clients are away on holiday for the summer and don't know when they're expected back.

As far as we're aware they are not interested in making the site available.

Kind regards

Henry Cahill RIBA | Architect
for and on behalf of Stanton Andrews Ltd

Sequential Test relevance: this is direct written evidence from the architect acting for the site as to the clients' current apparent intentions. It is relied upon as evidence that there is no demonstrated reasonable prospect of the site being made available on a comparable timetable.

A7 - Clough Bank Lane flood-risk/access evidence

The Environment Agency Flood Map for Planning evidence reviewed for this assessment shows Clough Bank passing through the mapped Flood Zone 3 extent. Clough Bank is the only vehicular access to the development site.

Sequential Test relevance

- Access and escape form part of the flood-risk comparison; the alternative cannot be treated as clearly lower risk merely because the dwelling plots themselves may be outside the highest-risk area.
- This differs from the Twin Brook Barn proposal as assessed in the submitted flood-risk material, where the proposed dwelling and identified safe access/escape arrangements are directed to Flood Zone 1.

The original applicant-supplied Flood Map for Planning extract should be retained with the evidence file if the Local Planning Authority wishes to inspect the mapped extent directly.

Source / evidence reference

Environment Agency / GOV.UK Flood Map for Planning.

RVBC planning application 3/2022/1005 - Land off Clough Bank Lane, Chatburn.

A8 - Clitheroe two-bedroom bungalow market evidence

The market evidence is used only as broad context for the type and scale of purpose-built downsizing accommodation in Clitheroe. It is not relied upon as a formal valuation of the application proposal or of any alternative site.

Half Penny Meadows - market context recorded for this assessment

- Taylor Wimpey listed the two-bedroom “Pendleton” over-55 bungalow at Half Penny Meadows, Clitheroe, at £272,995 for Plot 302 when checked on 10 August 2026.
- The advertised internal area is approximately 721 sq ft (67 m²).
- The applicants' proposed bungalow is materially larger, so the Pendleton is expressly not treated as a direct valuation comparable.

The evidence is included simply to put the £300,000 Nova land price and £325,000 Black Horse development-land price into context when considering the development opportunity actually being marketed.

Source / evidence reference

Taylor Wimpey - The Pendleton, Plot 302, Half Penny Meadows, Clitheroe.

Source checked for the original assessment on 10 August 2026:

<https://www.taylorwimpey.co.uk/new-homes/clitheroe/half-penny-meadows/plot-302>

A9 - Application drawing: Twin Brook Barn

The submitted Flood Risk Assessment, March 2026 topographical survey, Environment Agency Product 4 material and the application drawings are already part of Planning Application 3/2026/0494 and are not unnecessarily duplicated in this appendix.

Drawing referenced

- Sunderland Peacock & Associates drawing 5765-P02 Rev B - Proposed Ground Floor Plan and Elevations.

The drawing is referenced for context only. The Local Planning Authority should use the copy already held on the application file as the authoritative version.

Source / evidence reference

Planning Application 3/2026/0494 - drawing 5765-P02 Rev B and submitted flood-risk evidence.

APPENDIX C - NATIONAL POLICY AND GUIDANCE EXTRACTS

The extracts below reproduce the national policy and guidance passages most directly relevant to the applicants' primary paragraph 175 position and, if a Sequential Test is nevertheless required, the area of search and reasonably-available-site assessment.

C1 - National Planning Policy Framework paragraph 175

"The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."

Official source: GOV.UK, National Planning Policy Framework, Chapter 14, paragraph 175 (checked 11 August 2026):

<https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change>

C2 - Planning Practice Guidance paragraph 027a - area of search

"For a non-major housing development, it would not usually be appropriate for the area of search to extend beyond the specific area of a town or city in which the proposal is located, or beyond an individual village and its immediate neighbouring settlements."

"The sequential test should be applied proportionately, focusing on realistic alternatives in areas of lower flood risk that could meet the same development need."

Paragraph 027a, Reference ID: 7-027a-20220825; revision date 17 September 2025. Official source:

<https://www.gov.uk/guidance/flood-risk-and-coastal-change>

C3 - Planning Practice Guidance paragraph 028 - reasonably available sites

"Sites should be considered 'reasonably available' for the purposes of the sequential test if their location is suitable for the type of development proposed, they are able to meet the same development needs and they have a reasonable prospect of being developed at the same time as the proposal."

"In considering whether alternative lower-risk sites (which could, where relevant, be a series of two or more smaller sites) would be capable of accommodating the proposed development, such alternative sites do not need to be owned by the applicant to be considered 'reasonably available'."

Paragraph 028, Reference ID: 7-028-20220825; revision date 17 September 2025. Official source:

<https://www.gov.uk/guidance/flood-risk-and-coastal-change>