

SEQUENTIAL TEST

Planning Application

Construction of a Single Self-Build Bungalow

Site: Twin Brook Barn, Twin Brook Road, Clitheroe

1. Introduction

This Sequential Test has been prepared in support of a planning application for the construction of a single self-build bungalow at Twin Brook Barn, Twin Brook Road, Clitheroe.

The proposed dwelling is located wholly within Flood Zone 1 as identified on the Environment Agency Flood Map for Planning. A comprehensive site-specific Flood Risk Assessment accompanies the planning application and demonstrates that the proposed dwelling, together with all associated vulnerable development and safe pedestrian and vehicular access and egress, can be located within areas at the lowest probability of flooding.

During pre-application discussions the Local Planning Authority indicated that climate change modelling may identify parts of the wider site as being at future flood risk and that a Sequential Test may therefore be required as part of the validation process.

Without prejudice to the detailed conclusions contained within the accompanying Flood Risk Assessment, and solely in response to the Council's validation requirements, this Sequential Test has been prepared.

The accompanying Flood Risk Assessment considers in detail the Environment Agency hydraulic model, climate change allowances, detailed site-specific topographical survey information, the significant changes to surrounding ground levels following the construction of Twin Brook Business Park and Twin Brook Road, together with wider natural flood management works undertaken throughout the Mearley Brook and Worston Brook catchments since the hydraulic model was prepared.

Those matters are addressed fully within the Flood Risk Assessment and are not repeated here. The sole purpose of this document is to demonstrate that there are no reasonably available and suitable alternative sites within an appropriate search area that are located at a lower probability of flooding.

2. Planning Policy Context

The National Planning Policy Framework (NPPF) requires development to be directed towards areas with the lowest probability of flooding through application of the Sequential Test.

The purpose of the Sequential Test is to demonstrate that there are no reasonably available sites appropriate for the proposed development within areas of lower flood risk.

The proposal comprises a single self-build bungalow on a site extending to approximately 0.225 hectares and therefore constitutes non-major housing development.

Since the refusal of the Applicant's previous planning application, the Government has updated the Planning Practice Guidance relating to Flood Risk and Coastal Change. The September 2025 update provides important clarification regarding the application of the Sequential Test to non-major housing developments.

The updated Planning Practice Guidance states:

"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."

This represents a significant clarification of national planning guidance and confirms that the geographical extent of a Sequential Test should be proportionate to both the scale of development proposed and the planning need being addressed.

The updated guidance also confirms that only reasonably available sites should be considered and that those sites must be capable of accommodating the type of development proposed within an appropriate timescale.

The present proposal is not speculative residential development.

It is a single self-build retirement bungalow designed to meet the Applicant's own long-term housing needs.

The accompanying Flood Risk Assessment demonstrates that the proposed bungalow, together with safe pedestrian and vehicular access and egress, can be accommodated wholly within Flood Zone 1.

3. Description of the Proposal

Planning permission is sought for the construction of a single-storey self-build bungalow within the residential curtilage of Twin Brook Barn.

The proposal has been specifically designed to provide a permanent home for the Applicant and his wife as they approach retirement.

A principal objective of the proposal is to provide an accessible single-storey dwelling that will enable the Applicants to age in place, allowing them to remain independent within their own home as their needs change over time without requiring future adaptation or relocation.

The Applicant has lived within Clitheroe for approximately thirty years and wishes to remain within the town close to established family, healthcare facilities, community services and local amenities.

Remaining within Clitheroe will also enable the Applicant to continue providing regular support to an elderly close family member living nearby.

The proposal has therefore been designed to satisfy a very specific housing need that cannot readily be met by a general search for residential building plots across the wider Borough.

The dwelling has deliberately been positioned so that all vulnerable built development is located wholly within Flood Zone 1, consistent with the findings of the accompanying Flood Risk Assessment.

4. Area of Search

Having regard to the September 2025 Planning Practice Guidance, the Applicant considers that the appropriate primary search area is the settlement of Clitheroe.

The proposal comprises a single non-major self-build dwelling rather than speculative market housing.

The updated Planning Practice Guidance confirms that, for developments of this nature, it would not usually be appropriate for the Sequential Test search area to extend beyond the town within which the proposal is located.

The Applicant therefore considers that limiting the search to Clitheroe is fully consistent with current national planning guidance.

This approach is further justified by the particular characteristics of the proposal.

The development has clear locational requirements, including:

- providing a self-build retirement bungalow specifically designed to enable the Applicants to age in place;
- remaining within the community in which the Applicant has lived for approximately thirty years;
- maintaining established family and community support networks;
- remaining close to an elderly family member requiring regular assistance;
- retaining convenient walking access to local shops, healthcare facilities and public transport; and
- remaining within a sustainable location where the Applicant's existing social and family connections are already established.

These are genuine planning considerations that directly influence whether an alternative site can properly be regarded as reasonably available.

Nevertheless, in order to ensure this assessment is robust, residential development plots within the immediate surrounding area have also been reviewed where they could reasonably be regarded as potential alternatives, notwithstanding that they fall outside the primary Clitheroe search area.

5. Search Methodology

The applicant reviewed residential development opportunities using publicly available sources including:

- Rightmove
- Zoopla
- Plotfinder

Planning permissions known to the applicant were also reviewed together with currently marketed residential building plots.

In order to ensure that the assessment was proportionate and robust, a wider review of residential development opportunities was also undertaken. This included a systematic review of Ribble Valley Borough Council planning decisions covering the three-year period preceding submission of this application, together with searches of publicly available estate agent websites, land and development plot websites and other publicly marketed development opportunities.

The purpose of these searches was to identify any reasonably available sites capable of accommodating a single self-build bungalow within the applicant's identified search area, together with any sites in the immediate surrounding area that could reasonably be regarded as potential alternatives.

Each potential site identified through these searches was individually assessed having regard to:

- Whether the site was demonstrably available for purchase or development.
- Whether the site represented a genuine residential building plot rather than a conversion, replacement dwelling, major housing allocation or other form of development.
- Whether the site was sequentially preferable in flood risk terms.
- Whether the site was suitable to accommodate the proposed single self-build retirement bungalow.
- Whether the site met the applicant's identified locational requirements, including remaining within Clitheroe close to established family support, community facilities and local services.

The review identified that the overwhelming majority of planning applications related to householder development, conversions, replacement dwellings, agricultural development, commercial development or larger residential schemes, none of which represented reasonably available alternative sites for the proposed development.

Only two sites were identified that could reasonably be considered as potential alternatives. These sites are assessed individually below.

The applicant considers that the searches undertaken represent a proportionate and comprehensive assessment having regard to the scale and nature of the proposed development. Should the Local Planning Authority identify any additional sites considered to be reasonably available alternatives during the determination of the application, the applicant remains willing to review and assess those sites as part of the ongoing planning process.

6. Assessment of Alternative Sites

Site 1 – Twin Brook Farm, Upbrooks, Clitheroe BB7 1PL

This site is currently being marketed by Honeywell Estate Agents as a residential development opportunity benefiting from planning permission under reference 3/2019/1103.

The site is advertised for offers in excess of £200,000 and benefits from planning permission for the construction of two detached four-bedroom dwellings.

The approved development comprises two substantial family houses of approximately 195m² and 175m², each with its own garage, driveway and associated residential curtilage.

The previous buildings have already been demolished and the site is ready for construction.

Although this plot is available for purchase, it cannot reasonably be regarded as a sequentially preferable alternative for several reasons.

Firstly, the site lies wholly within Flood Zone 3, whereas the application site has been specifically designed so that all vulnerable built development is located wholly within Flood Zone 1.

The fundamental objective of the Sequential Test is to direct development towards land at the lowest probability of flooding. A site wholly within Flood Zone 3 cannot reasonably be regarded as preferable to one located wholly within Flood Zone 1.

Secondly, the planning permission relates to the construction of two substantial detached family houses, which is materially different from the Applicant's proposal for a single self-build retirement bungalow.

The proposal therefore does not represent a comparable form of development.

Thirdly, the approved scheme does not meet the Applicant's identified housing need for an accessible single-storey dwelling specifically designed to enable the Applicants to age in place.

Accordingly, this site cannot be regarded as a reasonably available and sequentially preferable alternative and is therefore discounted.

Site 2 – 3 Grindleton View, Chatburn BB7 4BE

The second residential development plot identified during the search is located at 3 Grindleton View, Chatburn.

The site is currently being marketed by Athertons Property & Land and benefits from full planning permission under reference 3/2023/0384.

The guide price is £325,000.

Planning permission has been granted for the construction of a substantial four-bedroom detached executive self-build dwelling extending to approximately 338m², including the integral garage.

Although available for purchase, this site is not considered to represent a reasonably available alternative for the proposed development.

Firstly, the site is located within Chatburn, outside the Applicant's primary search area of Clitheroe.

The September 2025 Planning Practice Guidance advises that for non-major housing development it would not usually be appropriate for the Sequential Test search area to extend beyond the town in which the proposal is located.

Consequently, this site falls outside the proportionate search area established by current national planning guidance.

Secondly, the approved development comprises a very large executive family dwelling ,on a site that requires the dwelling to be on 2 levels , substantially exceeding both the scale and nature of the Applicant's proposal.

Thirdly, acquisition of the site together with construction of the approved dwelling would involve a significantly greater financial commitment than the proposed modest self-build retirement bungalow.

Finally, the proposal would fail to satisfy the Applicant's identified housing need to remain within Clitheroe close to established family support, healthcare facilities, local services and an elderly close family member requiring ongoing assistance.

The approved dwelling has not been designed to meet the Applicant's specific requirement for a modest accessible bungalow intended to enable the Applicants to age in place within their established community.

For these reasons, this site cannot properly be regarded as a reasonably available alternative within the meaning of the National Planning Policy Framework and the September 2025 Planning Practice Guidance.

Accordingly, this site is discounted.

The applicant has also reviewed planning application 3/2022/1039 (Land adjacent to 115 Kemple View, Clitheroe), which was referred to during determination of the previous planning application. At the time of the previous decision, that application had not yet been determined. The current planning position has nevertheless been considered as part of this updated Sequential Test. Planning permission for that proposal was subsequently refused and the site has not resulted in an implementable residential development. Accordingly, the site is not considered to represent a reasonably available and suitable alternative for the purposes of this Sequential Test.

7. Summary of Assessment

The proportionate search undertaken for this Sequential Test identified only two residential development plots that could reasonably be considered as potential alternatives.

In addition to the two sites assessed above, a wider review of residential development opportunities was undertaken. This included a systematic review of Ribble Valley Borough Council planning decisions covering the three-year period preceding submission of this application, together with searches of Rightmove, Zoopla, Plotfinder, local estate agents and other publicly available development land information.

A number of planning permissions and residential developments were identified during this review. However, these related predominantly to replacement dwellings, conversions, larger housing developments, sites outside the applicant's defined search area, or sites that were not demonstrably available for purchase as individual residential building plots. No further sites were identified that could reasonably be regarded as both available and sequentially preferable to the application site.

The applicant therefore considers that the assessment set out above represents a proportionate review of all reasonably available alternative sites capable of accommodating the proposed self-build bungalow.

8. Conclusion

This Sequential Test has been prepared on a proportionate basis having regard to the scale, nature and purpose of the proposed development and the requirements of the National Planning Policy Framework and the Planning Practice Guidance on Flood Risk and Coastal Change.

The proposal comprises a single self-build bungalow on a site of approximately 0.225 hectares and is therefore a non-major housing development.

The September 2025 update to the Planning Practice Guidance provides important clarification regarding the geographical extent of Sequential Test searches for developments of this nature, stating that for non-major housing development it would not usually be appropriate for the area of search to extend beyond the specific area of the town in which the proposal is located.

Accordingly, the Applicant considers that the adoption of Clitheroe as the primary search area is fully consistent with current national planning guidance.

This approach is further supported by the specific circumstances of the proposal, namely:

- the proposal is a genuine self-build project rather than speculative residential development;
- the dwelling has been specifically designed to enable the Applicants to age in place within an accessible single-storey home;
- the Applicants have lived within Clitheroe for approximately thirty years;

- remaining within Clitheroe is necessary to maintain established family, healthcare and community connections;
- the proposal enables the Applicant to continue providing regular support to an elderly close family member living nearby; and
- the proposal seeks to provide a modest retirement bungalow rather than a substantial executive dwelling.

The assessment has reviewed the only two residential development plots identified during the search process together with wider searches undertaken using Rightmove, Zoopla and Plotfinder.

Neither of the available plots represents a reasonably available and suitable alternative.

The plot at Twin Brook Farm is located wholly within Flood Zone 3 and therefore fails the fundamental objective of the Sequential Test, which is to direct development towards land at the lowest probability of flooding.

The plot at 3 Grindleton View, Chatburn lies outside the appropriate search area identified by the September 2025 Planning Practice Guidance and has planning permission for a substantially larger executive dwelling that does not meet the Applicant's identified housing needs, locational requirements or financial objectives.

The Applicant is therefore unaware of any reasonably available and suitable alternative site capable of accommodating the proposed development.

Furthermore, the application site has itself been specifically designed so that the proposed bungalow, together with safe pedestrian and vehicular access and egress, are located wholly within Flood Zone 1.

The accompanying Flood Risk Assessment demonstrates that the development can be undertaken safely, will remain safe throughout its lifetime, including allowance for climate change, and will not increase flood risk elsewhere.

The proposal therefore satisfies the objectives of national planning policy by directing vulnerable development to land at the lowest probability of flooding while also meeting a clearly identified local housing need.

For these reasons, it is respectfully concluded that the proposal satisfies the requirements of the Sequential Test contained within the National Planning Policy Framework and the Planning Practice Guidance, and the Applicant respectfully requests that the Local Planning Authority proceeds to validate and determine the planning application on its planning merits.

The applicant remains willing to review any further reasonably available alternative sites

identified by the Local Planning Authority during determination of the application. However , based upon the proportionate searches undertaken , no such sites have been identified .