Dear Sirs,

We wish to make several observations in respect of the emerging Core Strategy and we acknowledge that at this stage of the process that we can only really refer to the ‘soundness’ of the process and in particular whether the document has been ‘positively prepared’ and/or has been ‘justified’.

Having read carefully through the documentation, we wish to raise a query on the Principle of the Housing numbers on which the housing land requirements of the borough have been based and also make some observations in respect of the emerging options for the broad distribution of the projected growth.

Essentially then and in respect of the Housing numbers, we wish to query the projected 20 year - 4,000 unit figure for the following reasons:

- The Nathaniel Lichfield and Partners (NL&P) Report commissioned by RVBC reached a judgement that a borough target of 190 – 220 dwellings would represent the most appropriate target range of housing development over the 20 year period. This therefore identified a projected target of 4,400 houses which was the figure that was proposed by officers to the planning committee on 2nd Feb 2012 and which the Committee resolved to reduce to 4,000 (200 dwellings per annum)

- In the recent Gladman Appeal Decision dated 26th March 2012 relating to the 270 unit Henthorn Road site, the Inspector stated that he accepted “that there is certainly credible and robust evidence to suggest that the (200) figure should be much higher and closer to the 330 – 350 dwellings per year advocated in the uncontested evidence” supplied. Whilst acknowledging this the Inspector pointed out that “whilst the outlook for the UK economy is somewhat uncertain” that “a cautious approach should be taken pending completion of the Council’s Core Strategy” and he accordingly considered that taking all matters into consideration “that the appropriate housing requirement figure to be used in determining this (Gladman) appeal should be not less than 200 dwellings per annum.”

- Whilst commenting on housing numbers, we think it pertinent to query the foundation of RVBC’s Assertion that they have a 5.2 year supply as the calculations have been based on the old RSS figures which are based on only 161 dwellings per year rather than the 200 unit per annum target being taken forward. In the Report to Planning Committee on Housing Land Availability which took place on 24th May 2012 it was acknowledged that, “Although a revised requirement has been established to inform the Core Strategy, the Council has not adopted this for decision making purposes as yet.” Should the 200 unit per annum target be used then we feel confident that RVBC would not have a 5 year supply.

- In addition para 47 of the recently published National Planning Policy Framework (NPPF) advises LPA’s to ‘boost’ significantly the supply of housing and “identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.” Arguably this latter requirement applies given RVBC’s own acknowledgement during recent years that they did not have a 5 year supply and this would logically require RVBC to review their 200 unit target and
increase it to 240 units per annum which would of course cause further difficulties with the five year housing land supply position.

With specific reference to the proposed distribution of growth and the selection of broad locations for the same and at this juncture specifically with respect to Clitheroe, we wish to assert that a 12.3 acre parcel of low quality agricultural land located on the south side of Henthorn Road could sustainably accommodate in the region of c. 150 dwellings (See attachments). Whilst this site has not historically featured in the SLAA process, we have been discussing this site with RVBC for some time as evidenced by the submission of a request for a Pre Application Meeting in December 2011 and the notes of the subsequent meeting which were issued out to us on 10th May 2012 following a meeting on 26th April 2012. It is our intention to shortly submit an outline planning application in respect of the full extent of this site and we are currently pulling together the various accompanying reports and plans in order to achieve submission and validation of the same.

In view of the Gladman Appeal decision which acknowledged that “the appeal site is located adjacent to the principal urban area of the Borough” and that “the appeal proposal would comprise a sustainable form of development”, we feel confident that our proposed site would be viewed as being equally ‘sustainable’. Indeed, in their Pre Application Letter RVBC have themselves advised us that “the development of this site would accord with the principles of achieving sustainable development as expressed with the NPPF.” It is our assertion that our proposals in respect of the land on the south side of Henthorn road might be viewed by many as infinitely more preferable and perhaps more ‘sustainable’ than siting up to 1,040 units on one site on the southern extremity of Clitheroe. It might well therefore be worth revisiting the scale of the Council’s preferred option and reallocating a proportion of the numbers to our emerging Henthorn Road site whilst perhaps also considering other sites more closely related to the town’s facilities to absorb some of the numbers that are envisaged at Standen.

Kind Regards and Thanks

[Signature]
Head of Strategic Planning

The Strategic Land Group Limited
3 King Street
Salford
M3 7DG

tel:
fax:
mob:
email:

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Joanne Macholc

From: planning
Sent: 07 December 2011 11:12
To: Phil Dover
Subject: RE: Three Pre Planning Inquires

Your receipt and acknowledgment is in the post. It will be up to the officers themselves to contact you direct in relation to the enquiries when they consider that they are ready to arrange a meeting.

Land SE of Henthorn Road, Clitheroe has been allocated to Sarah Westwood - reference RV2011\ENQ\00448
Barrow Garage, Old Whalley Nurseries and adjacent land parcel has been allocated to Graeme Thorpe - reference RV2011\00447
Land off Waddington Road, Clitheroe has been allocated to Sarah Westwood - reference RV2011\ENQ\00448

Jane

Jane Tucker| Planning Reception|
Ribble Valley Borough Council, Council Offices, Church Walk, Clitheroe, Lancashire BB7 2RA
T: 01200 414499| F: 01200 414487| E: jane.tucker@ribblevalley.gov.uk| W: www.ribblevalley.gov.uk

From: [redacted]  
Sent: 07 December 2011 11:07
To: planning
Subject: FW: Three Pre Planning Inquires

Dear Sirs

Could you please forward this email to Jane Tucker as my sent email has bounced back.

Kind Regards and Thanks

Head of Strategic Planning

Bowsall Limited
delivering affordable housing
bowsall house
3 King St
Salford M3 7dg
tel: [redacted]
fax: [redacted]
mob: [redacted]
email: [redacted]

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From: Phil Dover
Sent: 07 December 2011 11:01

1
Hi Jane

Could you please confirm if you have received our pre application inquiries and if so could you please let me have details of the officers likely to be dealing with the same?

Kind Regards and Thanks

Head of Strategic Planning

Bowsall Limited
delivering affordable housing
bowsall house
3 King St
Salford m3 7dg

tel: 
fax: 
mob: 
email: 

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Best in the country for customer satisfaction – 94 per cent of Ribble Valley residents are satisfied with life in the borough (Place Survey 2009)

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meeting date: 2 FEBRUARY 2012
Title: CORE STRATEGY – HOUSING REQUIREMENTS
Submitted by: CHIEF EXECUTIVE
Principal author: COLIN HIRST – HEAD OF REGENERATION & HOUSING

1 PURPOSE

1.1 To consider and agree the strategic housing requirement for Ribble Valley.

1.2 Relevance to the Council’s ambitions and priorities:

- Council Ambitions — To match the supply of homes in our area with identified housing needs and to progress the Core Strategy. The Core Strategy is a central Strategy of the Local Development Framework. It will help in the delivery of housing, employment and the protection and enhancement of the environment, ultimately presenting the Delivery Strategy for implementing the vision for the Ribble Valley for the next 15-20 years.

- Community Objectives — As a tool for delivering Spatial Policy the Core Strategy identifies how a range of issues relating to the objectives of a sustainable economy, thriving market towns and housing provision will be addressed through the planning system.

- Corporate Priorities — The Core Strategy is the central document of the LDF. The housing requirement is fundamental to determining planning applications and for the purposes of formulating planning policy.

- Other Considerations — The Council has a duty to prepare Spatial Policy under the Local Development Framework system.

2 BACKGROUND

2.1 As Members are aware the provision of housing is a key element of the Council’s land-use planning and its role in determining planning applications. As an issue, it generates without doubt high levels of interest and concerns amongst the local community, as demonstrated in recent Core Strategy consultations. Housing provision brings great pressure from landowners and developers; it plays a key economic role, has a role in delivering sustainable mixed communities; regeneration benefits and opportunities to deliver both affordable and a choice of houses (and location) to meet people’s aspirations. Establishing the appropriate working requirement is essential.

2.2 Previously, strategic planning for housing requirements has been delivered in a top down approach, formerly through the County Structure plans and more recently by way of Regionally set requirements in the Regional Spatial Strategy (RSS). District Authorities as consultees in the statutory planning process have had the opportunity to contribute to establishing housing requirements. However, the removal of the regional
tier puts the responsibility of establishing housing requirements with district planning authorities.

2.3 The Council needs to establish the housing requirement to inform decisions. It is not an option for the Council not to put in place a requirement. This would lead to decisions being taken out of the hands of the Council and would not allow the Council to fulfil its statutory duties and requirements as Local Planning Authority. The housing figure will be finalised as part of the work of preparing the Core Strategy with the proposed figure, incorporated into the Strategy and subject to the statutory Local Development Framework process. It will be subject to periods of statutory consultation, be capable of (and most likely will be) the subject of scrutiny by an Independent Inspector through the Examination in Public for the Core Strategy before it is formally adopted as part of the Strategic Planning Policy for the Borough.

2.4 Whilst the figure for housing is being established there will still need to be a recognised benchmark against which decisions can be made, which at present would be best served by continuing the application of the current RSS requirement. Already adopted by the Council for operational purposes.

3 GOVERNMENT GUIDANCE AND POLICY

3.1 In considering the housing requirement it is important to take into account Government guidance on the issues and to be aware of the framework within which the Council needs to address this matter. Current guidance is contained within Planning Policy Statement 1 – Sustainable Development, Planning Policy Statement 3 – Housing and Planning Policy Statement 12 – Local Spatial Planning. In addition the Council will need to be mindful of the emerging National Planning Policy Framework (NPPF) that has recently been the subject of consultation and is anticipated to be put in place later this year. Any changes of significance that the NPPF introduces will need to be taken into account at the relevant time. Whilst it is not known what the published version will contain our approach should be measured against it.

3.2 Guidance in PPS1, promotes a number of general themes including as a general approach the role of planning authorities in bringing forward sufficient land of a suitable quality and in suitable locations to meet expected need. In doing so it is necessary to ensure that plans and policies are properly based on the analysis of evidence. It is also expected that in support of sustainable economic development, plans will ensure the provision of sufficient, good quality new homes (including an appropriate mix of housing and adequate levels of affordable housing) and that overall this is within a principle of an integrated approach to sustainable development, including the opportunity for communities to be involved in the drawing of the vision, strategy and specific plan policies. The approach taken by the Council is consistent with this policy statement.

3.3 Planning Policy Statement 3 – Housing, establishes the national position in relation to both strategic housing policy objectives and planning for housing policy objectives. These objectives are set out at Appendix 1. The use of an evidence based policy approach to inform housing need and demand and deliver these objectives is critical. Information contained in the Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA) are seen as important. PPS3 gives guidance specifically upon assessing an appropriate level of housing wherein it is emphasised that a strategic approach should be taken, be evidence-based through for
example the preparation of the SHMA, reference and understanding of long-term housing market prices, affordability levels, and Government household projections. The Council has in conjunction with our consultants created a relevant evidence base.

3.4 Guidance within PPS12 – Local Spatial Planning underpins the process and the consideration to be given in preparing the Local Development Framework and in particular the Core Strategy. A fundamental element of delivering the Core Strategy is to identify the overall amount of housing required in an area, a role which has been placed in the remit of the Local Authority with the Coalition Government’s intention to remove the regional tier of strategic planning. Defining the housing requirement will enable the Core Strategy to deliver housing policy objectives: reflect the vision for the area that has been drawn up for the Core Strategy to reflect also the vision and aspirations set out in the adopted Sustainable Community Strategy. The Core Strategy vision is set out at Appendix 2. Again the guidance reiterates that the Core Strategy needs to be justified being founded upon a robust and credible evidence base bringing together two elements, namely, the evidence of the views of the local community and others who have a stake in the future of the area (including landowners and developers) and the evidence provided by research and facts supporting the choices being made. Ultimately the Council’s approach will be tested at the Examination in Public where the Inspector will consider, in the terms of the national policies whether the Core Strategy is sound.

3.5 Members will also be aware of the recently published draft National Planning Policy Framework (NPPF). This has been the subject of consultation and the final version is yet to be published, however it is anticipated before the 31 March 2012. Any significant implications for the housing requirement arising from the publication of the NPPF will need to be taken into account accordingly. The draft NPPF presented a very clear intention of Government to promote development activity that supported economic growth and in particular increased housing delivery. Indeed some of the most controversial elements that generated high levels of response and concern to the consultation related to the proposed presumption in favour of development and the assumption given that the default answer to development proposals was to be “yes” except where it would compromise key sustainable development principles.

3.6 It is reiterated in the draft document that plans should set out the strategic priorities for the area including strategic policies to deliver housing and economic development requirements, as well as the protection and enhancement of the natural and historic environment. Delivering policies that genuinely deliver these two competing strands is a challenge yet a fundamental role for the Local Planning Authority that is expected by the national policy. In relation to the issue of housing requirements the draft NPPF continues to emphasise the themes of the existing Planning Policy Statements referred to above. That is, the use of an appropriate evidence base, with relevant up to date information (that is available to the Council) about the economic, social and environmental characteristics and prospects for the area as well as account being taken of relevant market and economic indicators such as land prices and demand. The NPPF places a strong emphasis upon the use of SHMA (Strategic Housing Market Assessment) and SHLAA (Strategic Housing Land Available Assessment) in providing an understanding of housing requirements in the area and effectively the deliverability of those requirements.

3.7 A further important element of national policy that is identified in the draft NPPF and is a key component of the Localism Act is the ability for local communities through the
neighbourhood planning mechanism to facilitate additional development that is supported by the local community. This introduces additional flexibility to enable more housing to be brought forward where it is agreed to be appropriate.

3.8 In both existing guidance and the draft NPPF it is anticipated that Local Planning Authorities will have plans in place that look forward over at least a 15 year period, but that it needs to be recognised that the system has to allow enough flexibility for changing circumstances or indeed new evidence to be taken into account. What is also important is that in establishing a housing requirement, the proposed figure would not be treated as an absolute figure. Plans through their policies will enable relevant flexibilities where appropriate and providing the underlying vision, objectives and strategy is not fundamentally undermined. It is clear from the proposals in the draft NPPF and the Localism agenda that flexibility is intended in the planning system.

3.9 Similarly, a vital element that has to be taken into account to reflect national policies is that of infrastructure (in its broadest terms) that will be needed to support identified development and having a planned level of development against which providers and organisations responsible for its delivery can plan will be vital. The housing requirement is key to this, following which the necessary spatial distribution and delivery of services can be dealt with through the wider Core Strategy process.

4 THE COUNCIL’S APPROACH TO ESTABLISHING A HOUSING FIGURE

4.1 The Council recognised the implications of the Coalition Government’s policy approach and the anticipated revocation of regional strategy based targets meaning that a locally derived figure would need to be in place. Whilst the initial response was to confirm the continued application of the RSS figure for both plan-making and at that time perhaps more critically deciding planning applications, two factors had to be acknowledged. Firstly it would be a matter of a relatively short timescale before the Localism Act formally removed the RSS (which is now imminent) and secondly, in any event whilst the RSS was acknowledged by Government as being based on the most up to date evidence, the RSS reviews of housing requirements having been stopped, the adopted figure only covered the period up to 2021. The Council’s Core Strategy would therefore extend beyond this to 2028 leaving a period against which a figure needed to be determined. It should also be noticed that in any event it is a requirement of established Government guidance to plan for at least a 15 year period beyond the adoption date of the Core Strategy requiring an evidence based figure to be in place. With adoption anticipated in 2012, the 15 year period would also extend beyond the existing RSS figure. Consequently it was acknowledged that a housing requirement review is necessary at the local level.

4.2 The Council commissioned specialist advice from Nathaniel Litchfield & Partners who provided the Council with their report and advice. The report to the Planning and Development Committee meeting of the 11 August 2011 refers, Members should bring their copy of that report to the meeting for reference as it includes the consultant's report. The consultant's report draws on the modelling scenarios agreed by Members, takes account of relevant data and information available and concludes with the suggested range within which the consultants would anticipate a housing requirement to fall based on the modelling. The study and modelling undertaken for the Council by the consultants represent a key component of our evidence against which requirements can be set.
4.3 The consultant's have drawn a number of key conclusions that need to be taken into account in agreeing a housing requirement for the borough. These are set out below as an extract from the report:

1. Taking into account the scenarios tested and the Core constraint on development delivery as shown by current evidence, it is NLP’s view that the dwelling requirement for Ribble Valley borough should be in the range of 190 to 220 dwellings per annum between 2008 and 2028.

2. This figure is lower than the latest CLG household projections and particularly the employment led growth forecasts, to reflect realistic build rates for housing and constraints to delivery in the borough.

3. However, it is in NLP’s view that any figure significantly lower than this 190 – 220 range would be unlikely to allow for the provision of a suitable level of affordable housing in the borough; nor would it allow the borough to pursue its economic growth objectives without potentially encouraging unsustainable levels in commuting from neighbouring districts. The 190 – 220 DPA range also reflects the potential for increasing the delivery of housing in Ribble Valley following the relaxation of the Housing Policy restraint.

4. It will be important to monitor progress on housing delivery and the changing demographic characteristics of the residents to ensure that the range of 190 – 220 dwellings per annum remains both suitable and achievable.

4.4 It is also important to recognise that a number of factors are identified as being part of the process to determine a housing requirement. These include having regard to the wider debate over the scale of housing. In particular the extent to which development can be accommodated especially given the sensitive and protected landscapes in the area together with the ability of existing locations to absorb development including the extent to which planned growth is identified and promoted. It is also important to consider this within the scope of the vision and objectives that have been developed for the Core Strategy as well as aspirations of other Council priorities such as delivering affordable housing. In addition there is the need to recognise the availability of data in particular the impacts of new data becoming available through the release of the 2011 Census and the practicalities of incorporating a planned review to take this into account. It is also considered that review should be considered in order to reflect any implications of the uncertainties of existing economic circumstances given the current and ongoing economic climate.

5 CONSULTATION

5.1 It was agreed by Members that consultation was an important part of the process and accordingly the consultant’s report was published between November and December 2011 inviting comments on the report and the housing requirement review. The report was published on the Council’s website, press releases issued and the direct mailing of the extensive contacts listed on the Council’s LDF database with an invitation to comment. This consultation generated some 139 submissions from a range of respondents. Most (118) were from members of the general public who have continued to take part in the broader Core Strategy process, other were more technical submission on behalf of landowners, developers or house builders.
5.2 All responses, in redacted form, are available for reference at Level C Reception in the Council Offices. A summary of the responses is included as Appendix 3 to this report. As may be anticipated responses ranged from a fundamental opposition to house building through those that presented a view on the level of housing requirement thought to be acceptable, to those seeking a significant increase to that suggested by the NLP report as a matter of technical challenge. Some of the more technical responses that cited alternative assumptions or challenged specific elements of the modelling and consultants advice have been referred to the Council’s consultants for review and comment. An update on the consultants views will be given at the Committee meeting.

5.3 To inform the process and to provide an opportunity for consideration of issues by Members in more detail, a Member Working Group was set up. The report to Planning and Development Committee on 11 August 2011 and 10 November 2011, (Minutes 287 and 462 respectively), provides more information on this including Terms of Reference. Appendix 4 to this report sets out the report of the Chair of the Working Group including the conclusion of the group and its recommendations to Members of the Committee.

5.4 It is clear from the responses received that there will always be diverse views on the matter of housing requirements. It is also clear that of those that responded, the general public did not support the advice provided by the consultants. Members will need to balance the desire expressed by some to see no (or extremely limited levels) of new housing with those who seek higher levels of development through development aspirations. Members will also have to take account of other elements of available evidence in drawing a conclusion.

6 DISCUSSION AND CONCLUSIONS

6.1 The housing requirement needs to be established in order to progress the Core Strategy and ultimately to inform decisions on planning applications. Agreement of a working figure will enable the housing requirement to be tested through the LDF process and will mean that the implications of the emerging strategy can be appraised and infrastructure delivered in a co-ordinated way through the planning process. National Policy sets out clear guidance in terms of the approach to addressing housing requirements and the Council has taken steps to meet that guidance.

6.2 The principal evidence for the Council to consider is set out in the consultants report which concludes that an appropriate level of housing based on the evidence and modelling would lie between a range of 190 – 220 dwellings. The advice is also clear in terms of identifying a requirement of less than 190 as sought by many local residents. Clearly the consultation, as might be expected, generated a wide range of comments and as the summary of responses shows reflects a range of interests that might be anticipated. In general it can be demonstrated that the majority of professionally based responses (acknowledging their clients interests) indicate the higher end of the NLP range to be a minimum level of requirement if growth is not to be inadequate for the needs of the area and to meet Government and Council aspirations. Some are clearly seeking to pursue much higher levels of growth for which we await the consultants response and which in any event if not accepted, will be capable of further examination through the Core Strategy process.

6.3 It is also important to be mindful of other evidence that national guidance highlights such as the SHLAA and indeed Government projections. The SHMA as Members will recall
follows an established methodology and identified in terms of affordable housing a requirement to provide in the order of 264 dwellings per annum, simply to bring affordable requirements into balance. The attainment of this level of development especially given the mechanisms to deliver affordable housing is not viewed as realistic notwithstanding that, the SHMA indicates its results as it does. Similarly it is important to note as NLP do the position derived when using the most recent CLG household projections for the area, which would indicate a requirement of some 5,190 dwellings over the plan period or 260 per annum.

6.4 It is relevant to take into account the fact that in any event the projections and modelling can only ever be based on the data available at the time. This also includes the reality that new housing development and market performance as well as conditions within the national and local economy have been influenced by the recessional impacts that have occurred since 2007/8. This will have had some influence on circumstances over the initial plan period we are examining and the actual position that is operating at present. This in itself would lead to a cautious approach to a long-term requirement based on the realities of the data we have to work with. Indeed the timing of the release of the 2011 census data to enable an update to the demographic based requirement will be an important factor to take into account. However the process cannot be placed in abeyance pending the opportunity to carry out that work.

6.5 Given the considerations set out above and having regard to the consultations, consultants advice and evidence, whilst noting the underlying concerns of the local community it would be appropriate, in my view, to consider the housing requirement to be set towards the upper range of the consultants indications namely to prepare the Core Strategy on the basis of initially providing some 4,400 dwellings over the plan period (220 dwellings per annum) but that as part of the strategy a clear review is identified to be undertaken no more than 5 years from adoption. This will accommodate new census data, by that timeframe the Strategic Housing Market Assessment would have been reviewed as a matter of course to take account of changing evidence and the impact and extent of economic recovery would be known. If the level of 220 dwellings per annum was accepted this is close to the projected CLG figures and given the flexibility for additional development to come forward through neighbourhood planning, exceptions for affordable housing and an emerging development strategy that supports regeneration opportunities as well as affordable housing provision, this level of housing provision is not precluded from being delivered.

6.6 It is important to bear in mind that the process of distribution and scale of growth at any given settlement is not a function of the current task of establishing the appropriate level of housing requirement against which the Core Strategy will be set. However it is important to appreciate what the housing requirement indicated above (220 dwellings per annum) would actually mean going forward. Firstly it is important to bear in mind that this figure would not be an absolute ceiling, there will always be a need for an element of flexibility, and it is clear from the draft NPPF that there is a clear approach from Government to have in place a mechanism to boost the supply of housing and through housing delivery support economic growth in an responsive manner. The Council’s policies will need to ensure that this can be met. It is also important to have in mind that whilst an annualised figure (220) is used for purposes of monitoring and managing delivery through the identification of a five-year supply actual delivery each year may be higher or lower and at any time a higher number of approvals may be in the system.
6.7 The most important figure in relation to the Core Strategy becomes the figure for the plan period against which the Development Strategy is applied. It should also be noted that the housing requirement relates to the plan period, those houses completed or with existing planning permissions need to be taken into account. With this in mind by way of illustration on the basis of a requirement to meet 4,400 dwellings between 2008 and 2028 the housing position would be as follows:

<table>
<thead>
<tr>
<th>Requirement 2008/2028:</th>
<th>4,400 (220 dpa)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions:</td>
<td>300</td>
</tr>
<tr>
<td>Existing planning permissions *:</td>
<td>694</td>
</tr>
<tr>
<td>Requirement to find up to 2028</td>
<td>3,406 (@ 16.5 yrs remaining period = 206 dpa)</td>
</tr>
<tr>
<td>Assuming Strategic site agreed</td>
<td>- 1,040</td>
</tr>
<tr>
<td>Dwellings to accommodate</td>
<td>2,366 **</td>
</tr>
</tbody>
</table>

Figures as at the 1 October 2011

* Planning permissions include affordable permissions but exclude any discounting for slippage.

** This equates to an annual equivalent over the remaining plan period of 143 dwellings per annum to be planned for, over and above existing completions, commitments and the proposed strategic site.

6.7 Within the context of the remaining plan period therefore and the proposal to consider delivery by way of a strategic site as a key component of the Strategy the remaining provision on the basis of the upper end of the NLP range would mean in effect planning for a requirement going forward of some 2,370 dwellings.

7 RISK ASSESSMENT

7.1 The approval of this report may have the following implications:

- **Resources – None.**
- **Technical, Environmental and Legal –** In forming a judgement Members will need to ensure a justified and evidence-based approach is taken in line with existing planning policy guidance.
- **Political –** There is significant interest in housing and related Core Strategy issues.
- **Reputation –** The decision taken will influence future planning decisions and demonstrate the ability to take the lead role on issues of significance to the local community.
8 RECOMMENDED THAT COMMITTEE

8.1 Agree for the purposes of the Core Strategy that the housing requirement is set at the upper extent of the range advised by the Council's consultants, namely 4,400 dwellings during the plan period and that provision for a formal review is undertaken within 5 years of adoption of the Core Strategy is included in the proposals.

CHIEF EXECUTIVE

BACKGROUND PAPERS

1 Planning Policy Guidance Note 1 – Sustainable Development.
2 Planning Policy Guidance Note 3 – Housing.
3 Planning Policy Guidance Note 12 – Local Spatial Planning.
4 Ribble Valley Housing Requirement – Nathaniel Lichfield and Partners.
5 Consultation response files.

For further information please ask for Colin Hirst, extension 4503.
EXTRACT FROM PPS3 – HOUSING

Strategic housing policy objectives

9. The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking:
   - To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community.
   - To widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need.
   - To improve affordability across the housing market, including by increasing the supply of housing.
   - To create sustainable, inclusive, mixed communities in all areas, both urban and rural.

Planning for housing policy objectives

10. These housing policy objectives provide the context for planning for housing through development plans and planning decisions. The specific outcomes that the planning system should deliver are:

   - High quality housing that is well-designed and built to a high standard.

   - A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural.

   - A sufficient quantity of housing taking into account need and demand and seeking to improve choice.

   - Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure.

   - A flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate.
THE CORE STRATEGY VISION

The Ribble Valley will be an area with an exceptional environment and quality of life for all, sustained by vital and vibrant market towns and villages acting as thriving service centres, meeting the needs of residents, businesses and visitors. We will seek to create an area with unrivalled quality of place, respecting the unique, natural, social and build heritage of the area.

New development to meet the needs of the area for growth, services and quality of life will be managed to ensure the special characteristics of the area are preserved for future generations.

Strategic Objectives:

Respect, protect and enhance the high quality environment and biodiversity in the borough.

Match the supply of affordable and decent homes in the borough with the identified housing needs.

Ensure a suitable proportion of housing meets local needs.

Improve the competitiveness and productivity of local businesses by safeguarding and promoting local employment opportunities.

Ensure neighbourhoods are sought after locations by building cohesive communities and promoting community safety.

Support existing retail business while improving the retail offer by ensuring the vitality and viability of the retail areas are considered.

Co-ordinate, innovate and diversify sustainable tourism, building on our strengths and developing new initiatives.

Improve accessibility and service delivery to address rural isolation.

Contribute to local, regional and wider sustainable development.
SUMMARY OF RESPONSES TO CONSULTATION ON "DEFINING A LOCAL HOUSING REQUIREMENT"
(Consultation from November to December 2011)

Responses to this consultation fell into two main groups; the first comprising those from local residents and the second from a group comprising planning agents, statutory respondents such as government agencies or adjacent local authorities, and local action groups. As responses from the two groups are sufficiently different in content and approach it is sensible to summarise them separately before any wider Ribble valley summary can be made.

A total of 139 responses were made

118 (85%) were made by local residents

21 (15%) were made by agents, gov't agencies, adjacent authorities, action groups etc

Part A - Local Residents' Responses.

There were 118 responses from local residents. In total, as many raised more than one point in their response, there were 446 points raised.

In terms of the overall reaction to the recommendations of the NLP report (ie the housing range of 190 – 220 units per year) 83% (98) of responses were opposed to these figures, feeling them to be excessive.

Only 9% (11) of responses supported or agreed with the NLP recommended figures, with the remaining 8% (9) of responses a combination of non committal or those that were difficult to interpret or that dealt with issues not relation to the housing requirement question.

Most answered with a response relating to the whole Borough, although a minority responded instead about their locality, eg Clitheroe, Sabden etc.

The most often quoted reasons given by those opposing the recommendation were:

1. Infrastructure (mentioned 86 times either in general or in relation to specific types of infrastructure)

30 points related to local infrastructure in general being unable to cope with the NLP recommended figure or that people doubted that it would be provided to accompany any new development.

Specific aspects of infrastructure deemed currently under pressure were also mentioned:

Traffic Congestion, impact on local roads - (21 mentions)
Education lack of provision, schools unable to cope - (14)
Health Provision (7)
Drainage (7)
2. The Local Economy (mentioned 43 times)

The main thrust here was that people felt that the NLP assumptions of future economic growth were based on past periods of growth that were no longer relevant and the figures ignored the current economic constraints. Some felt that renewed growth was a long way off.

In addition some wanted to know where the jobs were going to be for those occupying the proposed new housing given that some high profile local firms were currently laying workers off.

3. Current levels of houses for sale or lying empty. (mentioned 33 times)

Responses here focused on the belief that there are many houses (ie an unusually high amount) currently for sale and some also feeling that there are a considerable number of empty properties in the area and that therefore this indicated that there was not the need for a significant amount of new build suggested in the report.

4. The Wider Environment, Character of the Area (mentioned 32 times)

Comments here related to opposition to development on Greenfield sites and that brownfield sites should be prioritised, and that the scale of development proposed in the recommendations would be environmentally unacceptable for a rural area.

Consultants Have a Conflict of Interest, Too Close to Developers. (10 responses)

Comment here felt that the consultants were not objective and that they were in some way in general terms too close to development interests to give an objective view that represented the wider local interest.

Planning Time Scales (7 responses)

Some felt that it was inherently difficult to plan over a period of 20 years or so and that the world was too changeable to make such planning meaningful and accurate.
Planning should be done over shorter time frames that better reflected the real world.

Suggestions of Alternative Housing Requirement Figures. (c 98 responses)

There was no clear alternative housing figure from those who felt that the 190 – 220 recommended figure was too high. Responses varied from "No more houses" and build new housing elsewhere outside the Borough to support for the existing 161 per year figure. Many respondents (42) did not state a figure or an option that they preferred but simply expressed their rejection of the 190 – 220 figure in various ways. Those who did state a preference are detailed below:

| No more houses                                      | 4 |
| Between 0 and 50 houses per year (including support for option C) | 1 |
| Between 50 and 100 per year (including support for options B to C) | 25 |
| Between 100 and 150 per year                        | 16 |
| Between 150 and 161 per year                        | 6 |
Part B. Responses by Planning Agents, Government Agencies, Other Local Authorities, Action Groups etc

Of the 21 responses received from this group 5 made detailed technical points which have been passed on to NLP for a detailed reply. In addition a further 6 responses stated that they had no comment to make on the consultation. The remaining 10 responses are briefly summarised on an individual basis below.

Briefly the responses below taken together generally indicate support for figures higher than the NLP recommendation of 190 – 220.

1. Carter Jonas
   Feels that any figure should acknowledge pre-moratorium build rates. Goes on to state that the 190 – 220 figure recommended “sits conservatively in the middle” of the range of housing figures presented. On the whole they support an increase in housing numbers across the district “where this meets market requirements, supports economic growth and the needs of employers as well as addressing local need”

2. Smith Gore
   Feels that a policy for no housing would lead to stagnation. States that the NLP recommended figure is lower than the latest Government household projections and employment forecasts as NLP consider it reflects realistic build rates and agree that any figure lower than the 190 – 220 would not deliver a suitable level of affordable housing. 220 should be the minimum figure with flexibility to increase to 260 to take into account future trends.

3. Planning Bureau
   Expresses concern that the report contains no direct comment regarding the housing need that the predicted future population will generate. Supports the need for future private sheltered accommodation schemes.

4. House Builders Federation
   The Council should plan on the basis of Scenario E (Past Trends Job Growth - 559 units per year) to reflect Government objectives to support economic growth. Feels it is right that the Council should plan to encourage new migrants to the area to increase the economically active element of the population and help to sustain local services. Oppose Scenario B (Natural Change) as this would lead to a fall in population and economic activity. Also opposed to Option C (Zero Net Migration)

5. Turley Associates
   State that the housing figure should not be lower than 220 per year. Feels that the NLP recommended range can be questioned regarding its appropriateness in relation to demographic derived forecasts which indicate a level of 260 per year. Suggests that further work should be carried out to test a range of 220 – 260 to ensure better consistency with Government household projections.
6. United Utilities
No comment on housing figures. Goes on to make comments regarding policies within Core Strategy. But points out that infrastructure investment will be required to support any major development schemes.

7. Co-operative Estates
Agree that forecasts based on employment led statistics are unreliable as they depend on past growth trends which do not reflect the on-going period of economic instability. Support a figure towards the higher end of the recommended 190 – 220 range. Also feel that the annual figure should align with the pre-recession completion figure of 225 per year.

8. Stephen Abbott Associates
Not clear why the recommended figure has been selected. Feels the NLP comment that the figure reflects local constraints on development which seems at odds with the findings of the SHLAA which shows sites for 5441 deliverable units. Also points to the SHMA showing a need for 264 per year. Therefore feels that the 190 – 220 figure will risk undershoot in relation to need and demand. Feels that under provision risks infrastructure delivery problems arising from piecemeal planning, some by appeal. Also points to need to conform to NPPF.

9. Janet Dixon Town Planners
Feels that the range 190 – 260 is most realistic. However feels that the vacancy test of 1.9% is achievable therefore making figures close to 190 unrealistic. Feels that 220 – 260 more realistic. This is close to historic completion rates.

10. Dickman Associates
Feels that the NLP report does not take into account NPPF requirement for 20% minimum increase in first 5 years. Also uncertain whether the 190 – 220 figure is gross or net. Feels that the 190 – 220 figure is unclear as to whether it takes into account likely economic growth. The SHMA indicates 264 per year and historic completion rates are over 220 per year.
APPENDIX 4

Ribble Valley Borough Council – Planning & Development Committee

Report of Meetings of Housing Numbers Working Group

1. Introduction

Approval was given for the LDF Core Strategy – Outline Approach set out in Agenda Item No 7 Appendix 1 at the 8 Dec 2011 Planning & Development Committee. The housing numbers, etc in the paper were based on the RSS figure of 3220 over the 20 year period 2008-2028 (equivalent to 161 pa). For consistency, 3220 is the figure which has been used in all projections, etc until a firm figure is agreed by RVBC bearing in mind that the public consultation period on the RV Housing Requirement (Nathaniel Lichfield) report did not end until mid-December. P&D Committee agreed at their 10 Nov 11 meeting that a small Housing Review sub WG be formed to consider the responses to the consultation & report back to Committee. The Group was set up with the following members: Cllr R Sherras (Chair), Cllr T Hill, Cllr S Bibby, Cllr G Mirfin together with Colin Hirst. Its objectives (from 10 Nov 11 P&D Ctee) were:

3. Objectives

3.1 To provide a forum to discuss the findings of the consultant’s report and the implications for the proper planning of the borough.

3.2 To consider the consultation response to the Housing Requirements Review Report and identify any key matters of concern.

3.3 In the light of the consultation response to consider the recommendations in the Council’s report and contribute advice to the Planning and Development Committee on an appropriate level of housing provision.

The WG formally met on 2 occasions – 5 Jan 12 & 20 Jan 12, but in addition several pieces of information, etc have been exchanged/distributed.

2. Consultation & Responses

In addition to its publication in the 11 Aug 11 report to P&D (publicly available), responses to the findings of the Nathaniel Lichfield report were specifically invited from those on the previous core strategy respondent database. The majority of the responses were of a general nature or related to only specific areas/settlements rather than the overall RV housing requirement – these are being analysed separately. Some responses addressed the overall requirement, of these: 2 made detailed points about the need to increase the requirement above the Nathaniel Lichfield recommendation (3800 – 4400 [190 – 200pa]) & 1 made a case for a reduction from the 3220 (RSS) figure.

The Working Group have asked Nathaniel Lichfield for their views on the responses & whether they wish to change the recommendations at Section 6.2 of their original report:

1. Taking into account the scenarios tested and the core constraints on development delivery as shown by current evidence, it is NLP’s view that the dwelling requirement for Ribble Valley Borough should be in the range of 190-220 dwellings per annum between 2008 and 2028;

2. This figure is lower than the latest CLG household projections and particularly the employment-led growth forecasts, to reflect realistic build rates of housing and constraints to delivery in the Borough;

3. However, it is NLP’s view that any figure significantly lower than this 190-220 range would be unlikely to allow for the provision of a suitable level of affordable housing in the Borough; nor would it allow the Borough to pursue its economic growth objectives without potentially encouraging unsustainable levels of in-commuting from neighbouring districts. The 190-220 dpa range also reflects the potential for increasing the delivery of housing in Ribble Valley following the relaxation of the housing policy restraint;

They have promised that their views will be received by us in time for them to be reported at or before the Feb 2 P&D Ctee meeting.
3 Working Group Deliberations
The first meeting (5 Jan 12) considered the responses & discussed the changes in the housing & economic situation since the SHMA (Strategic Housing Market Assessment) was consulted upon & finally adopted in December 2008 by RVBC as part of evidence base. There was an extensive discussion on the SHMA. It was agreed that although it may need revisiting later in the 20 year plan period as more up to date information became available (eg 2011 census data), it would not be appropriate to discount it totally at present. Arguments for or against specific parts could however be accommodated by building some flexibility into the final figures. It was also agreed that we seek Nathaniel Lichfield comments on the 3 detailed responses & ask whether they wish to change their original recommended housing requirement numbers in the light of the comments. The meeting closed with a view to reconvening when more information & hopefully N Lichfield comments were available & WG members had had an opportunity to look at the responses overall in more detail. As stated above N Lichfield have agreed to comment but their views will be reported to P&D Ctee.

The second meeting (20 Jan 12) was held to come to some conclusions to enable Colin Hirst to write his report for submission to the special P&D Ctee meeting on 2 Feb 12. Various items containing information/views prepared mainly by individual members after the first meeting were discussed. These covered: an overall assessment of economic, etc data available & its relevance to RV housing requirements; more detailed figures of the possible effect on settlements as defined in the Approach to a Preferred Option report approved by P&D Ctee at their 8 Dec 11 meeting; the need to emphasise the need for phasing of delivery of the overall 20 year total requirement rather than a flat annual requirement eg 3200 over 20 years equated to 161 pa.

4 Conclusions & Recommendation to P&D Committee
This has been a most difficult task in trying to balance conflicting views on the relevance of economic, housing, demographic, etc data with the practical need to recommend a level which:

a. Can be successfully defended against challenges at Examination in Public (EIP)

b. Is acceptable to residents in the Borough at both settlement & borough level as being reasonable

The Working Group elected members agreed that despite many reservations a figure must be recommended as a basis for Colin Hirst & his fellow officers to proceed with producing a draft Preferred Option for the Core Strategy. Without that, both our sustainability consultants, Hyder, and those charged with producing the mandatory Infrastructure Plan will find it virtually impossible to proceed with possible impacts/requirements.

With the reservations & qualifications above & the observations below, the 20 year requirement recommended to Committee is 4000 dwellings (equivalent to average of 200 pa).

6 Working Group Observations
There are some important observations which the WG members wish to record as being important in any debate, even though some may be outside the WGs terms of reference.

1. There is a need to think of phased delivery of the total 20 year requirement rather than the flat equivalent annual requirement. This takes account of the varying levels of economic activity & accommodates market troughs & peaks.

2. The current numerical requirements can only be based on overall requirement less definite permissions ie the permissions/completions between 2008 to present date can be deducted – currently these amount to almost 1400.

3. Account is not taken of those planning permissions already granted but for which the necessary Section 106 agreement has not been signed. Technically these do not yet
have full permission but it is considered unlikely that they will not be agreed & signed. These currently add up to 400 dwellings.

4. Taking points 2 & 3 into account leaves a net requirement based on the recommendation of 4000 less (1400 + 400) = 2200. If one then takes into account the Strategic Site concept (1040 dwellings) identified in the 8 Dec 11 report to P&D Clee then the figures become:

4000 less (1400 + 400 + 1040) = 1160

Richard Sherras
Chair, Housing Numbers Working Group

20 Jan 12
Dear Mr Dover

LAND SOUTH EAST OF HENTHORN ROAD CLITHEROE

I write with regard to the above pre-application advice which requests this Council's view on proposals for the use of land as described above for residential development. We met on 26 April and as promised here are our detailed observations on this matter which for ease of reference is broken down into headings.

**Principle of Development and Relevant Planning Policy**

To begin, it is important to note that we would encourage a site of this scale to be promoted through the Local Development Framework (LDF), work on which is currently underway. The scheme you are proposing is a residential development for approximately 120 dwellings with a single point of access off Henthorn Road. As you will be aware work has been ongoing to produce a preferred Development Strategy option for the Core Strategy (and subsequently the LDF as a whole) and what was historically the Regulation 27 Draft document was presented to a Special Planning and Development Committee on 4 April. Public consultation on that document has now commenced. On the basis of the current timetable that colleagues in the Regeneration and Housing Team are working to it is envisaged that an Examination could take place in Autumn and subject to the Inspector's Report adoption of the Core Strategy is anticipated by the end of the year. Given the timetable of events it is acknowledged that the current situation and policies of the adoptedsaved Districtwide Local Plan must be considered at this stage to assist with this current request for pre-application advice. I would, however, stress that dependent upon when an application is submitted and taken forward for consideration the weight to be attached to the existing 'saved' policies of the adopted Districtwide Local Plan may change from the views expressed within this response.

From the information provided with the request for pre-application advice, it appears that under the adopted Districtwide Local Plan, the site falls just outside of the settlement boundary and is designated Open Countryside (Policies ENV3, H2 and G5) Policy ENV3 states that in the open countryside, development will be required to be in keeping with the character of the landscape area and should reflect local vernacular style features and building materials. Proposals to conserve, renew and enhance landscape features will be permitted, providing regard has been given to the characteristic landscape features of the area. Policy H2 of the Plan discusses the concept of only permitting residential development to meet an identified local need being allowed within open countryside areas and states that the impact of proposals on the countryside will...
be an important consideration in determining all planning applications. Development should be appropriately sited and landscaped. In addition, scale, design, and materials used must reflect the character of the area, and the nature of the enterprise. Thus the need to consider the potential visual impact of any scheme will be key to the decision making process.

Policy G5 of the Plan forms part of the saved settlement strategy and seeks to restrict new residential development outside identified settlement boundaries to local needs housing or that which is essential for an agricultural/forestry worker. The policies of the saved Local Plan were of course formulated during the 1990s, with the Plan being adopted in 1998. The basis of the Plan's formulation was framed around the strategic framework set by the Lancashire Structure Plan, against which the Plan established its settlement boundaries to reflect the applicable planned housing requirement and the necessary allocation of land to meet that at that time. It should be acknowledged that clearly we are sometime on from when those boundaries were established and that there will clearly be a need to identify how the Council can address identified requirements that are relevant now and that have been set, in our instance through the Regional Strategy.

The most relevant policies of the Regional Strategy (RS) are those that relate to housing requirements (Policy L4) and affordable housing (Policy L5). Government advice has highlighted that the RS is soon to be abolished and as a result it will fall upon LPAs to determine what the housing requirement should be for their own Borough, albeit determined upon strong and robust evidence. The Council has established that it will continue to determine planning applications against the existing RS figure of 161 dwellings per year. Even though the Council is undertaking a review of its housing requirements as part of the plan making process, any increase in requirement will, it is considered, need to be addressed through the Core Strategy Examination. Therefore whilst mindful of the figure of 200 dwellings per year agreed by a Special meeting of the Planning and Development Committee on 20th February 2012 as the annual housing requirement, following work undertaken by Nathanial, Litchfield and Partners (NLP) consultants on assessing what the overall requirement for housing land should be in the borough, it is the 161 per year requirement which forms the basis for the comments offered in relation to this enquiry.

As the proposals are for the development of 120 residential units, the National Planning Policy Framework (NPPF) must be considered. Para 14 states that 'At the heart of the NPPF is a presumption in favour of sustainable development' which means for decision making purposes in relation to this pre application enquiry that:

- Where the development plan is absent, silent or relevant policies are out of date granting permission unless:
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
  - Specific policies in this framework indicate development should be restricted.

The NPPF requires Authorities to consider housing applications in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the LPA cannot demonstrate a 5yr supply of deliverable sites (para 49). As at 1 April 2012, Ribble Valley can demonstrate a 5.2 year supply.
It is considered that although the site would be located on land designated as open countryside, it is adjacent to the settlement boundary of Clitheroe and therefore closely related to a service centre where the predominance of services and local facilities are to be found. I am conscious of the decision issued by the Planning Inspectorate for the site to the opposite side of Henthorn Road for 270 dwellings where the Inspector concluded that in his view the development of a site immediately adjacent to the built up area of Clitheroe would in principle be ‘sustainable’ and that was in part due to the fact that such a location would reduce reliance upon the private car. If you have read the Inspector’s report you will be aware that there is a discussion about accessibility as that was a concern expressed by Planning and Development Committee in formulating the reasons for refusal of that scheme, but the Inspector recognised that there are many other components of sustainability other than accessibility. In terms of addressing the bullet points above I would advise that on the basis of the information provided to date, and subject to incorporation of matters within any subsequent submission associated with infrastructure requirements that are detailed elsewhere within this response, the development of this site would accord with the principles of achieving sustainable development as expressed within the NPPF.

I have made reference to the Council being able to demonstrate a five-year land supply, it can also demonstrate a supply position that would address any immediate pressures with schemes in the pipeline that will continue to address the supply pressures. The Regulation 19 Draft that is soon to be out for consultation puts forward a development strategy going forward that will direct development in the main to Clitheroe as the key service centre with growth envisaged principally at the proposed strategic site of Standen. This would leave a requirement for the remainder of the Clitheroe area of some 340 dwellings over the plan period (2008-2028). In assessing you enquiry against the Draft Regulation 19 Document I would comment that the figure of 340 does not take into account the 270 approved at Henthorn, the 54 dwellings approved at Low Moor and 8 that Committee are minded to approve at the Henthorn Garage site subject to satisfactory completion of a S106 Agreement. Nor does it take account of schemes currently awaiting presentation to Planning and Development Committee for formal determination. If all of these were taken into account then consideration needs to be given to whether further development elsewhere within the town would significantly undermine the development strategy as expressed in the aforementioned document - in particular would it restrict the Council’s choice of greenfield sites in developing the Local Development Framework. I am of the opinion that the level of development envisaged here may well prove to do so but as you are aware consultation is still to be undertaken on the preferred option and thus interpretation on this matter will be subject to change as both work on that document proceeds and Members give consideration to other schemes already in the system in the coming months.

Affordable Housing

In relation to the level of affordable housing required on the site, a percentage of housing on the site would have to meet an identified housing need. The Council’s document entitled ‘Addressing Housing Needs’ (Adopted January 2012) is a material planning consideration in this matter and is intended to be both complementary with and supplemental to the relevant policies contained within the Districtwide Local Plan - the later clearly placing the site within open countryside where policy G5 would require development to be 100% affordable. However, as stated, your site is closely related to the settlement boundary and in such an instance, having regard to the requirements of NPPF, the Council would adopt the approach outlined in paragraph 3.1 of the Housing Policy, i.e. in Longridge and Clitheroe on housing developments of 10 or more dwellings (or sites of 0.5 hectares or more, irrespective of the number of dwellings) the Council will
seek 30% affordable units on the site. This approach is taken because of the particular location of the site in relation to the identified settlement boundary and not because it is a qualifying development under the saved settlement strategy of the Districtwide Local Plan. The Council would therefore require a minimum of 30% of the site (under current proposals) to be for affordable housing which meets an identified local need. 15% of the site would need to be for elderly persons (of these a 50/50 split between market units and affordable units). Rachael Stott who is the Council’s Housing Strategy Officer has advised that the Clitheroe Housing Needs Survey is about to be re-done in May and thus she would not wish to provide any specific detailed comments in respect of tenure mix until the results of that survey are available.

Trees/Ecology/Biodiversity/Land Quality

In this respect I have sought advice from David Hewitt, the Council’s Countryside Officer and colleagues at the Environment Agency. The site is Greenfield with trees and hedgerows in situ.

Any subsequent application would need to be accompanied by a Phase 1 Habitat Survey/ ecology survey to determine the presence or absence of protected species or habitats within the application site. These should be conducted by a suitably qualified ecologist at an appropriate time of year. These surveys will guide the development and where necessary identify any mitigation measures that may be required to compensate for any habitat/species loss. Mitigation should be on a like-for-like basis, ensuring that the area and quality of habitat and/or species population is equal to that which would be lost as a result of the development. As stated there are trees and hedgerows around the site and the habitat survey should pick up the value of the hedgerows and a tree survey be carried out that clearly identifies Root Protection Areas based on DBH calculations.

The Environment Agency has requested that any proposals retain water features such as ditches and ponds (even if they are seasonally dry) as they form important habitats and wildlife corridors. Buffer zones of a minimum 5 metres (measured from the top of the bank) should be maintained around/along these features.

It is also recommend that any planting proposed be of locally native species, and that hedgerows and or trees that are present be left intact and protected during development.

David Hewitt has raised an issue about the provision of building specific bird/bat species nest/root sites being incorporated into those buildings/elevations identified as appropriate and I thought it best to bring this to your attention now as you may wish to put in details of this as part of any submission. I am not sure if you are aware that the Primrose Lodge site in Clitheroe has been identified as a receptor site for Conservation Credits and that developers can purchase credits for the site which will then be used to further the environmental enhancement work that is to be progressed at that location. The Conservation Credit scheme operates separately from the planning system but I draw it to your attention as future developers may wish to demonstrate their ‘environmental credentials’ outside of the remit of the planning system. If you would wish any further details on this then I suggest you contact David direct on 01200 414505.

A matter to raise with you under this heading is a guide for further work to support any future application in terms of agricultural land quality. According to the information sources I have available to me the land would be classed as Grade 3 agricultural land and I draw your attention to saved Policy ENV6 which seeks to safeguard the best and
most versatile land. I raise this with you as there was an application submitted on this site for residential development back in 1979 (3/1979/1101/P) that was refused for a number of reasons, one of which was its Grade 3 land classification. I would recommend that you carry out a reappraisal of the land classification in order to establish whether it is good quality agricultural land or indeed a lower grade as was I believe the case with the site opposite this.

**Highways**

Martin Nugent who is the highway engineer at Lancashire County Council was at our meeting and his initial comments are expressed below although these should not be considered definitive.

The recent appeal decision in relation to the existing Henthorn Road site provides a useful indication of many of the relevant highway considerations at this location.

**Access**

The location of a suitably designed vehicular access to the site from the south east side of Henthorn Road should be readily achieve, as there is considerable scope for the safe siting of the access within the available frontage to the site.

As the sole means of vehicular access, there would be a residential loop road serving up to 120 dwellings within the site. The design capacity of such a road would need to be carefully considered to provide a coherent route through the site and it should be possible to place appropriate measures within the 11 acre site to minimise points of conflict (vehicle/vehicle and vehicle/pedestrian).

There are no other links to adjacent lengths of highway or footway from this site and there are no footpaths within or immediately adjacent to the site. Therefore, measures should be considered to achieve a pedestrian link to Footpath 17. Consideration should also be given to other appropriate cycle links, such as leisure/amenity links to River Ribble and commuter/leisure links to Clitheroe town centre.

**Extent of Scoping Study**

The direct impact of the proposed development will be experienced as:

a. a potential delay for emerging traffic from neighbouring residential streets, Kenilworth Drive, Conway Avenue, Myton Avenue, etc;

b. queuing and delays at a number of junctions; Thorn Street, Bawdlands, Eshton Terrace, Woone Lane, Edisford Road and Parson Lane;

c. the capacity of the mini-roundabout at Woone Lane and Moor Lane;

d. the Transport Assessment for this site will include as committed development the approved application for 270 dwellings on the site opposite. It will be appropriate to raise and have addressed many of the arguments concerning the sustainability of further residential development in this vicinity.

**Possible Mitigating Highway Measures**

1. Public Transport, improved and additional bus stops within or close to the site.
2. Pedestrian link to Footpath 17 and consideration of other appropriate cycle links.
3. Measures to improve the safe and efficient movement of traffic along Henthorn Road and through its junctions with Thorn Street and Bawdlands, and other links through to the principal highway network.

The costs of preparing, advertising and bringing these measures into effect would be met by the applicant.

Martin’s colleagues at LCC Property Assets Team (Planning Contributions) have made the following request for potential highway contributions in respect of transport measures:

**Request for Highways Contribution**

Should the LPA be minded to approve this development, the County Council would seek planning obligation contributions from this development to fund measures that support sustainable transport. It is acknowledged that a number of measures provided under proposed s278 highway works support sustainable development. However, it is considered that further sustainable measures may be necessary to promote and support sustainable development, particularly in respect of public transport. Until agreement has been reached on the Transport Assessment the LHA is unable to provide full details on the request for planning obligations relating to highways and transport. The planning obligations are expected to cover:

- contribution for sustainable transport, walking, cycling and public transport, and
- request for contribution for advice and assistance with the Travel Plan.

A Highways contribution of £194,400 will be sought. This is based on 120 dwellings of unknown room size, 84 for open sale and 36 affordable, with an approximated Accessibility score of 20, as follows:- 84 x £1,800 = £151,200 and 36 x £1,200 = £43,200.

This figure may have to be reassessed when the precise distribution of house types and affordable element are fully known

**Cycle and Pedestrian measures**

Measures should be considered for a pedestrian link to Footpath 17 and consideration of other appropriate cycle links, such as leisure/amenity links to River Ribble and commuter/leisure links to Clitheroe town centre.

As a guide, a contribution of £50,000 would assist with the creation of these links, in liaison with previous undertakings from the developer and the planning authority.

**Public Transport**

The provision of suitable bus stop locations would be required as the available stops fall outside a 400m radius from the centre of the site.

Furthermore, a contribution to the funding of the existing C1 services would also be sought, with the detailed financial arrangements determined as part of a future S106 agreement.
Travel Plan

We would request that individual Travel Plans should be developed and approved by LCC Travel Plan team, timescales for which would be agreed as a condition of planning approval.

Each Full Travel Plan needs to include the following as a minimum:

- Appointment of a named Travel Plan Co-ordinator.
- Travel survey.
- Details of cycling, pedestrian and public transport links to the site.
- Details of secure, covered cycle parking.
- SMART Targets for non-car modes of travel.
- Action plan of measures to be introduced.
- Details of arrangements for monitoring and review of the Travel Plan for a period of at least 5 years.

For a development of this size, a contribution of £12,000 is required to enable Lancashire County Council Travel Planning team to provide a range of services as described in 2.1.5.16 of the Planning Obligations in Lancashire paper dated September 2008.

Any questions on this aspect of my response should be directed to Rob Hancock, Travel Plan Adviser, Sustainable Travel, Lancashire County Council on 01772 530702.

Public Open Space

On a development of this size there will be a requirement for public open space under Policy RT8 of the DWLP. The Council do not have a set formula for working out the size of such an area and this would be dictated to a degree by the type of accommodation to be provided on site. Ultimately the decision would be yours with a justification to be given for the approach taken in any submission. I note that an area is set aside at the centre of the development area for this purpose and at this stage would say that it appears to meet the requirements of the aforementioned policy in terms of being an adequate and usable area of public open space. It is not the Council's intention to take on any future management/maintenance responsibilities associated with such areas and you would have to work out how this would happen. We would also require details of the layout/equipment to be provided on such an area which would be subject to further discussion.

Design/Layout/Visual Amenity

You have provided a conceptual masterplan for discussion which shows a single point of access leading from Henthorn Road with a single loop road serving the whole development which has an area of public open space at its centre. The layout appears to protect the route of an existing sewer through the site and has a series of focal buildings throughout in an attempt to break up the development blocks. You have said that the site area is approximately 11 acres (4.45ha) which on a site of approximately 120 dwellings would mean an average density across the whole site of 27 dwellings per hectare. However, this is clearly skewed by the area of public open space at the core at the development site and you will need to make referenced in any supporting information to an application of the area of the site that is residential and that which is POS in order that a realistic density figure is given. The masterplan shows a strong development edge to Henthorn Road but it is not clear from the drawing whether these
houses would have individual access points onto the main road. This approach would reflect the existing development along the Henthorn Road frontage which is characterized to the immediate east of the site by detached dwellings with individual driveways but I would advise against the long linear blocks proposed. The site is on the edge of the town’s development limits and thus I would suggest that, whilst the density would on face value in purely numeric terms, assessing the whole site appear low, more thought is given to the building/layout form. There is some variation shown but I do not consider the long expanses of what would appear to be terraced form appropriate in this setting. I am mindful of the NPPF guidance on good design offered in paras 56-56 and I suggest that more attention is given to the building footprints/layout in relation to neighbouring development on Kenilworth Drive and the local area more generally in order to break up the massing of the built form. Clearly any design approach would need to be justified as part of a Design and Access Statement submitted in support of an application. In terms of general layout principles we adopt the 21m between facing habitable rooms at first floor and this will be an important consideration in assessing the potential impact of the development on the existing residents bordering the site. Another consideration will be the overall scale and massing of the built form and whilst I have guarded against the long blocks shown I have no information on building heights and would again suggest that you look to existing development as a guide in this respect.

In respect of the potential visual impact of the development on this greenfield site which would extend the urban edge of the settlement, I am of the opinion that the impact would be of a localized nature. It is inevitable that any development will bring with it some impact and the important consideration is whether this would prove significantly harmful to the landscape character of the area.

I have asked for comments from the Planning Officer (archaeology) at LCC who has advised that The proposal site has been identified in the ALSF Aggregate Extraction in the Lower Ribble Valley Final Report (Oxford Archaeology North/University of Liverpool, 2007) as being considered to have a high potential for archaeological deposits dating to the prehistoric, a medium potential for the Roman period and a medium to high potential for the Medieval period.

Submission of a planning application to develop the site would therefore be likely to meet with a recommendation from the County Archaeology Service that the site be the subject of a pre-determination archaeological field evaluation. Such work is likely to consist of a combination of geophysical survey and trial trenching, in order to characterise the nature and extent of any deposits that might survive on the site, and to provide information as to whether there is a need to preserve such deposits or to mitigate the effects of the development through archaeological excavation.

**Renewables**

The Council would condition that the proposal should secure at least 10% of the predicted energy requirements from decentralised and renewable or low carbon sources unless it can be demonstrated, having regard to the type of development or design, that this is not feasible or viable. We would be fairly flexible in our approach to the use of such techniques and have approved schemes which provide a mix of fabric first and ‘bolt on’ renewable types.

**Lancashire County Council Planning Contributions**

LCC adopted the policy paper Planning Obligations in Lancashire on 3 November 2006 which was updated in 2008. It puts forward principles, methods and good practice with
the aim of developing a consistent and robust approach to planning obligations across Lancashire. Whilst the formal observation from the education team had not been received at the time this response was drafted I have highlighted above the sustainable transport requirements from LCC. Should additional comments be forthcoming at some point in the future on the outstanding matters I shall forward these to you.

**Environment Agency**

Considered the site in question prior to the introduction of the NPPF, and commented that as part of any subsequent planning application, the following issues will need to be considered:

**Flood Risk & Water Quality**

In accordance with Planning Policy Statement 25 (PPS25), any application for a development over 1 hectare in Flood Zone 1 should be accompanied by a Flood Risk Assessment (FRA). Surface water run-off rates from the site must be restricted to existing rates at minimum. In accordance with PPS25, opportunities offered by new development to reduce the causes and impacts of flooding should also be considered. Full details of the proposed drainage arrangements will need to be submitted as part of the FRA.

Although the site is not within Flood Zone 2 or 3, there is an undesignated watercourse flowing adjacent to the site. We note that it is intended to retain/restore this watercourse based on the illustrative Masterplan. If it is intended to discharge surface water from the proposed development to this watercourse, it will be necessary to identify the existing and potential capacities and flows within this watercourse as part of the FRA.

Surface water run-off should be managed through the use of sustainable drainage systems (SUDS), and we advocate their use. SUDS are a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands that attenuate the rate and quantity of surface water run-off from a site, and contribute to a reduced risk of flooding. SUDS offer other benefits in terms of promoting groundwater recharge, water quality improvement and amenity enhancements. Approved Document Part H of the Building Regulations 2000 sets out a hierarchy for surface water disposal which encourages a SUDS approach. Further information on SUDS can be found in the following documents:


The Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SUDS, and is available on both the Environment Agency’s website (www.environment-agency.gov.uk) and CIRIA’s website (www.ciria.org.uk).

As stated above, the management of surface water via the use of SUDS would also benefit water quality. The River Ribble and Mearley Brook are both at moderate status for diatoms and invertebrates respectively. Mearley Brook is a priority catchment for us and there has already been an impact from previous housing developments causing contaminated surface water which is being addressed by United Utilities under their Asset Management Plan (AMP) 5 programme. We would recommend that any
developer consult with UU to consider whether the development of this site could potential impact on the AMP5 works.

Developers will need to ensure that surface water from any areas on the site likely to be contaminated should be connected to the foul sewer to prevent pollution of the surface water drainage network. This could be achieved through a number of ways, such as the use of SUDS and ensuring all downspouts are sealed directly into the ground ensuring the only open grids present around any dwelling/building are connected to the foul sewage systems.

Any works to the watercourse within the site which involve infilling, diversion, culverting or which may otherwise restrict flow, require the prior written Consent of the Environment Agency under Section 23 of the Land Drainage Act 1991. Culverting other than for access purposes is unlikely to receive Consent, without full mitigation for loss of flood storage and habitats.

**Land Contamination**

Given that this is a Greenfield site, it is unlikely that the proposed development would pose a significant risk to controlled waters. However, it is recommended that a desk study is undertaken to confirm whether or not this is the case.

**Infrastructure Capacity**

The developer is strongly advised to contact UU to discuss whether or not the existing treatment works and sewage network itself have the capacity to accept sewerage from the site.

The developer should ensure that facilities are provided within any proposals for adequate storage of the current three bin waste recycling system in the Ribble Valley to ensure that recycling and sustainable waste management is promoted within the development.

Prior to the submission of any planning application, we would be happy to comment on any proposals for the site or any surveys/reports that the applicant intends to submit as part of the application.

**United Utilities**

There had been no response from United Utilities at the time of drafting this letter but as you will note from the observations of the Environment Agency concerns have started to be expressed about the capacity of the Wastewater Treatment Works and thus I would suggest that you contact them direct to ascertain their requirements as part of any formal submission to us.

**Miscellaneous**

We have a new Pennine Architectural Liaison Officer covering our area who may take a more proactive role in passing comment on secure by design matters. Her contact details are Barbara Thomber tel: 01282 472554 email Barbara.thomber@lancashire.pnn.police.

The Council’s position on wheeled bins is that we impose a standard charge of £90 per unit to developers to cover the administration and delivery costs in providing the standard three 140 litre wheeled bins to each household within new build developments.
To summarise, I would comment that whilst the principle of development may be acceptable at this point in time, the progression of the Core Strategy towards examination will have a bearing on the suitability of the site having regard to the Development Strategy it puts forward to guide development to 2028 - in particular, restricting the Council's choice of greenfield sites in developing the Local Development Framework. I stress the views given in this letter represent officer opinions only given without prejudice to the final determination of any application submitted. They are a reflection of our views at the time of writing this response and may be subject to change as matters progress on the LDF.

Yours sincerely

S. Westwood

SARAH WESTWOOD
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M3 7DG
SOIL RESOURCES AND
AGRICULTURAL USE & QUALITY
LAND SOUTH OF HENTHORN ROAD,
CLITHEROE

Report 775/1
1st June, 2012

Land Research
ASSOCIATES
SOIL RESOURCES AND AGRICULTURAL USE AND QUALITY
OF LAND SOUTH OF HENTHORN ROAD, CLITHEROE

M J Reeve, CSci, FISSLSci, MBIAC

Report 755/1
Land Research Associates Ltd
Lockington Hall,
Lockington,
Derby
DE74 2RH

1st June, 2012
1.0 Introduction

1.1 This report provides information on the soils, agricultural quality and use of 5.1 ha of land south of Henthorn Road, Clitheroe. The report is based on a soil and agricultural desk study and a survey of the land in late May 2012.

SITE ENVIRONMENT AND AGRICULTURAL USE

1.2 The site forms a gently sloping triangular block of land at 55m aOD alongside Henthorn Road. The gardens of housing along Kenilworth Drive and at the end of Stirling Close form the eastern boundary and other agricultural fields form the southern boundary.

1.3 The land is divided into two parts by a stream than runs north-south alongside a hedgerow in the eastern part of the block. To the west of the stream is small grass field with an access off Henthorn Road. The larger area to the east of the stream is farmed as a single field of permanent grassland, although it includes the remnants of hedgerows that formerly divided the land into three fields.

PUBLISHED INFORMATION

1.4 BGS 1:50,000 geology maps show that the basal geology of Clitheroe Limestone and Hodder Mudstone formation site is entirely covered by Devensian till within the site boundary.

1.5 There are no published detailed soil surveys of the area, but the area is covered by the national soil map¹, published at 1:250,000 scale. This shows the land as Brickfield 3 association, which comprises slowly permeable clay loam and clay soils developed in till.

1.6 Reconnaissance agricultural land classification (ALC) mapping carried out in the 1970s shows the agricultural land of the study area as grade 3.

2.0 Soils

2.1 The Defra Soil Strategy\(^2\) points out that soils deliver a range of vital functions for human activities including food and fibre production, support for ecosystems and habitats, and environmental services that play a vital role in the global carbon cycle, stabilising and degrading contaminants and providing clean water. One of the strategy’s objectives is to ensure that soil functions (soil ecosystem services) are fully valued in the planning process.

2.2 A detailed soil and agricultural quality survey was carried out in late May 2012. It was based on observations at the intersects and centres of a 100 m grid, giving a sampling density of two observations per hectare (11 in total). During the survey soils were examined by a combination of pits and augerings to a maximum depth of just over 1 m. A log of the sampling points and a map (Map 2) showing their location is in an appendix to this report.

2.3 The survey showed that a clay loam over clay soil is typical of the whole site. The topsoil (cultivation layer) is typically a 15 cm thick rusty-mottled heavy clay loam, although medium clay loam topsoil was encountered in two locations and the topsoil in the small field tends to be slightly thicker – 22 cm. In most places the topsoil is directly underlain by grey-mottled clay subsoil but, in three locations is over 10-15 cm-thick heavy clay loam with the clay encountered at a depth of 25-37 cm. The clay is dense, slowly permeable and passes downwards into dark grey clay that in places is stony with sandstones and, in places, limestone.

2.4 An example profile from observation 6 (Map 2) is described below:

<table>
<thead>
<tr>
<th>Depth (cm)</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-15 cm</td>
<td>Very dark greyish brown (10YR 3/2) heavy clay loam passing downwards into dark grey to very dark grey (10YR 4/1-3/1) heavy clay loam with common fine and extremely fine yellowish red (5YR 4/6) prominent mottles along root channels; a few small and medium soft stones, mainly of sandstone; moderately developed medium angular blocky structure; friable to firm consistency; 1% fine macro pores; abundant very fine fibrous roots; abrupt smooth boundary to:</td>
</tr>
<tr>
<td>15-31 cm</td>
<td>Dark greyish brown (10YR 4/2) clay with many fine dark yellowish brown (10YR 4/4 and 4/6) and common medium dark grey (10YR 4/1) prominent mottles; rare stones; moderately developed coarse prismatic structure with dark greyish</td>
</tr>
</tbody>
</table>

\(^2\) Safeguarding our Soils: a Strategy for England (Defra, 2009)
brown (10YR 4/2) ped faces; firm consistency; 0.1% fine macropores; common very fine fibrous roots, mainly on ped faces; clear smooth boundary to:

31-100 cm Very dark grey (10YR 3/1) clay with many fine and medium distinct dark yellowish brown (10YR3/4) distinct mottles; stoneless; weak developed adherent coarse prismatic structure becoming structureless massive below 50 cm; very firm; no visible macropores; non calcareous; a few very fine fibrous roots above 50 cm.

2.5 These soils are slowly permeable and only have a very limited capacity to absorb excess winter rainfall. Consequently water ponds above the clay subsoil in winter months.
3.0 Agricultural Quality

3.1 To assist in assessing land quality, the Ministry of Agriculture, Fisheries and Food (MAFF) developed a method for classifying agricultural land by grade according to the extent to which physical or chemical characteristics impose long-term limitations on agricultural use for food production. The MAFF Agricultural Land Classification (ALC) system classifies land into five grades numbered 1 to 5, with grade 3 divided into two sub-grades (3a and 3b). The system was devised and introduced in the 1960s and revised in 1988.

3.2 The agricultural climate is an important factor in assessing the agricultural quality of land and has been calculated using the Climatological Data for Agricultural Land Classification\(^3\). The relevant site data for an average elevation of 55 m is given below.

- Average annual rainfall: 1,179 mm
- January-June accumulated temperature >0°C: 1359 day\(^a\)
- Field capacity period (when the soils are fully replete with water): 263 days mid Aug-mid May
- Summer moisture deficits for:
  - wheat: 64 mm
  - potatoes: 44 mm

3.3 The site’s location on the edge of the Pennines gives rise to a relatively wet agricultural climate with a long period when the soils are wet. This limits the land quality to sub-grade 3a or below.

3.4 The survey described in the previous section was used in conjunction with the agroclimatic data above to classify the site using the revised guidelines for agricultural land classification issued in 1988 by the Ministry of Agriculture, Fisheries and Food\(^4\).

SURVEY RESULTS

3.5 Most of the land is classified as grade 4 but there is a small area of sub-grade 3b where there is a greater depth of permeable soil over clay.

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\(^3\) Climatological Data for Agricultural Land Classification. Meteorological Office, 1989

Subgrade 3b

3.6 This is subgrade occupies less than half a hectare of land on a rise in the small field. A 22 cm-thick stony medium clay loam topsoil is over a 15 cm thick stony heavy clay loam upper subsoil with slowly permeable clay below. The greater thickness of permeable soil provides slightly better natural drainage (wetness class IV) than the rest of the land.

Grade 4

3.7 This is the dominant grade of the site, accounting for more than 90% of it. The soils described in paragraphs 2.3-2.5 are typical and, because of slowly permeable clay within 30 cm of the surface and gentle (1-2°) slopes, lie wet for long periods in autumn, winter and spring (wetness class V). This limits opportunities for cultivation and tends to restrict agricultural use to grass.

Grade areas

3.8 The boundaries between the different grades of land are shown on Map 2 and the areas occupied by each are shown below.

Table 1. Areas within the survey area occupied by the different land grades

<table>
<thead>
<tr>
<th>Grade/subgrade</th>
<th>Area (ha)</th>
<th>% of site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subgrade 3b</td>
<td>0.4</td>
<td>8</td>
</tr>
<tr>
<td>Grade 4</td>
<td>4.7</td>
<td>92</td>
</tr>
<tr>
<td>Total</td>
<td>5.1</td>
<td>100</td>
</tr>
</tbody>
</table>
APPENDIX

LOCATION AND DETAILS OF OBSERVATIONS
### Soil and agricultural land quality survey, land south of Henthorn Road, Clitheroe - Details of observations at each sampling point

<table>
<thead>
<tr>
<th>No</th>
<th>Topsoil</th>
<th>Upper subsoil</th>
<th>Lower subsoil</th>
<th>Wetness Class</th>
<th>Agricultural quality</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Depth (cm)</td>
<td>Texture</td>
<td>Stones (%)</td>
<td>Depth (cm)</td>
<td>Texture</td>
</tr>
<tr>
<td>1</td>
<td>0-15</td>
<td>HCL</td>
<td>&lt;1</td>
<td>16-25</td>
<td>HCL</td>
</tr>
<tr>
<td>2</td>
<td>0-23</td>
<td>MCL</td>
<td>0</td>
<td>23-40</td>
<td>C</td>
</tr>
<tr>
<td>3</td>
<td>0-15</td>
<td>HCL</td>
<td>&lt;1</td>
<td>15-45</td>
<td>C</td>
</tr>
<tr>
<td>4</td>
<td>0-15</td>
<td>HCL</td>
<td>&lt;1</td>
<td>15-50</td>
<td>C</td>
</tr>
<tr>
<td>5</td>
<td>0-22</td>
<td>HCL</td>
<td>2</td>
<td>22-45</td>
<td>C</td>
</tr>
<tr>
<td>6</td>
<td>0-15</td>
<td>HCL</td>
<td>1</td>
<td>15-30</td>
<td>C</td>
</tr>
<tr>
<td>7</td>
<td>0-15</td>
<td>HCL</td>
<td>1</td>
<td>15-75</td>
<td>C</td>
</tr>
<tr>
<td>8</td>
<td>0-22</td>
<td>MCL</td>
<td>5</td>
<td>22-37</td>
<td>C</td>
</tr>
<tr>
<td>9</td>
<td>0-15</td>
<td>MCL</td>
<td>&lt;1</td>
<td>15-45</td>
<td>C</td>
</tr>
<tr>
<td>10</td>
<td>0-15</td>
<td>HCL</td>
<td>&lt;1</td>
<td>15-70</td>
<td>C</td>
</tr>
<tr>
<td>11</td>
<td>0-15</td>
<td>HCL</td>
<td>&lt;1</td>
<td>15-26</td>
<td>HCL</td>
</tr>
</tbody>
</table>

**Key to table**

- **Mottle intensity:**
  - o: unmottled
  - x: few to common rusty root mottles (topsoils) or a few ochreous mottles (subsoils)
  - xx: common to many ochreous mottles and/or dull structure faces common to many greyish or pale mottles (grayed horizon)
  - xxx: dominantly grey, often with some ochreous mottles (grayed horizon)

- **Texture:**
  - G - clay
  - ZC - silty clay
  - SC - sandy clay
  - CL - clay loam (H-heavy, M-medium)
  - ZCL - silty clay loam (H-heavy, M-medium)
  - SCL - sandy clay loam
  - SZL - sandy silt loam (F-fine, M-medium, C-coarse)
  - SL - sandy loam (F-fine, M-medium, C-coarse)
  - LS - loamy sand (F-fine, M-medium, C-coarse)
  - S - sand (F-fine, M-medium, C-coarse)
  - LP - loamy peat; P - peat

- **Limitations:**
  - W - wetness/workability
  - D - droughtiness
  - De - depth
  - St - stoniness
  - Sl - slope
  - F - flooding
  - T - topography/microrelief

- **Texture suffixes & prefixes:**
  - r - reddish; gy - grey; dk - dark
  - mn - ferrimanganeseferous concretions

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- A depth underlined (e.g. 50) indicates the top of a slowly permeable layer.