

Ribble Valley Borough Council
Development Control
Council Offices Church Walk
Clitheroe
Lancashire
BB7 2RA

Our ref: NO/2022/114539/01-L01
Your ref: 3/2022/0536
Date: 30 June 2022

Dear Sir/Madam

**PROPOSED DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF NINE 2-BED APARTMENTS OVER THREE STOREYS TOGETHER WITH A TWO STOREY BUSINESS CENTRE AND ASSOCIATED BIN, CYCLE STORES AND CAR PARKING.
PEEL STREET BUSINESS ESTATE, PEEL STREET, CLITHEROE, BB7 1RA**

Thank you for consulting us on the above application which we received 10 June 2022.

Environment Agency position

We have reviewed the submitted Flood Risk Assessment, '*Flood Risk Assessment – Peel Street, Clitheroe BB7 1RA*' Ref: QFRA 2139 V1.0, dated 21/03/2022 and prepared by UK Flood Risk Consultants Limited

In the absence of an acceptable flood risk assessment (FRA), we object to this application and recommend that planning permission is refused.

Reasons

The submitted FRA, does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development.

In particular the FRA fails to:

- Specify Finished Floor Levels in Metres Above Ordnance Datum (mAOD)
- Take the impacts of climate change into account according to '[Flood risk assessments: climate change allowances](#)'. - Although the FRA states that: "*The Central allowance for the Ribble/North-West River Basin District is 36% for the period between 2070 and 2115 (Table 4). This allowance should be used for assessing the impact of climate change to the flood risk to the site.*" no assessment is made.
- Use the most up to date information to understand how a range of flooding events, (including extreme events) will affect people and property; the FRA seems to rely on the fact that there is no historical flooding on the site, neglecting

Environment Agency
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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modelled scenarios.

- Undertake flood hazard analysis using EA/ Defra research Flood Risk Assessment Guidance for New Development (FD2320) and the supporting Explanatory Note for FD2320 and FD2321
- Consider how a range of flooding events (including extreme events) will affect people and property consider how people will be kept safe from the identified flood hazards, including consideration of safe access and egress routes.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Guidance on how to prepare a flood risk assessment can be found at

<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

Flood warning and emergency response - Advice to LPA

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The [planning practice guidance](#) to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the Planning Practice Guidance (PPG).

Product 4 data request to inform climate change allowances - Advice to applicant

Flood risk data requests will be based on existing EA hydraulic models for existing 1% and 0.5% annual probability events with an allowance for climate change. Note as climate change allowances are updated we update our models but this work is not done immediately for all locations.

You should refer to '[Flood risk assessments: climate change allowances](#)' to check if the allowances modelled are appropriate for the type of development you are proposing and its location. You may need to undertake further assessment of future flood risk using different allowances to ensure your assessment of future flood risk is based on best available evidence.

Environmental permit - Advice to applicant

It is unclear from the submitted plans what distance the proposed "Building 1" and the other elements of built development are from Mearley Brook which is a designated Main

River. We therefore remind the applicant of the rules governing the need to apply for an environmental permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the riverbank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Yours faithfully

Carole Woosey
Planning Advisor

