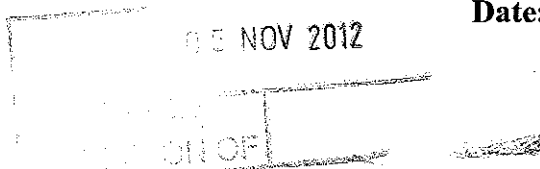


Ribble Valley Borough Council
 Development Control
 Council Offices Church Walk
 Clitheroe
 Lancashire
 BB7 2RA

Our ref: NO/2012/104426/01-L01
 and NO/2012/104423/01

Your ref: 3/2012/0785 and 3/2012/0786

Date: 02 November 2012



Dear Sir/Madam

LAND AT CLITHEROE HOSPITAL, CHATBURN ROAD, CLITHEROE, LANCASHIRE, BB7 4JX.

1) OUTLINE APPLICATION FOR DEMOLITION/PART DEMOLITION OF EXISTING HOSPITAL AND ENABLING RESIDENTIAL DEVELOPMENT INCLUDING ASSOCIATED ACCESS, PARKING, OPEN SPACE AND RELATED INFRASTRUCTURE.

2) PROPOSED ERECTION OF A TWO-STOREY COMMUNITY HOSPITAL INCLUDING ASSOCIATED ACCESS, PARKING, INFRASTRUCTURE WORKS, BOUNDARY TREATMENTS AND LANDSCAPING.

Thank you for consulting us on these proposals, our comments relate to planning application references 3/2012/0786 and 3/2012/0785. The two main considerations in relation to the site are the potential impacts of flooding and determination of whether any environmental permits are needed.

Environment Agency position

The Environment Agency objects to the proposed development as submitted due to the absence of an acceptable Flood Risk Assessment (FRA). We recommend that planning permission is refused on this application.

Reason

The FRA submitted with this application does not comply with the requirements set out in paragraph 9 of the Technical Guide to the National Planning Policy Framework. It does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to quantify discharge rates and provide sufficient information on how surface water run-off rates from the new development will be limited to greenfield discharge rates. The FRA also fails to highlight suitable surface water mitigation and also lacks details of a suitable drainage system.

Cont/d.

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

Overcoming our objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall.

A quality FRA will include the following:-

- clear plans and drawings showing the precise positions and sectional information on the proposed land levels.
- demonstrate that the development will not increase risk elsewhere and where possible reduces flood risk overall.
- evidence that the development is appropriately flood resilient and resistant, including safe access and escape routes where required. It should show that any residual risk can be safely managed, including by emergency planning.
- gives priority to the use of sustainable drainage systems based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development.

Regrettably, if this cannot be achieved or the revised FRA is insufficient, we are likely to maintain our objection to the application. If the applicants or agents wish to discuss this position with us, they should contact James Jackson on 01772 714134.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

Consenting and Permitting

I understand that site operators have carried out an assessments of the environmental impacts from the proposal. I am advised that the Agency's National Permitting team has taken this into account when determining whether or not to issue an Environmental Permit. The assessments confirm that the proposed emissions from the site would be unlikely to exceed any environmental quality standards or environmental assessment levels. Therefore, no permits are required. The assessments should be reviewed whenever there is a change in operation at the site.

If you have any questions about the contents of this letter, please contact me.

Yours faithfully

Dan Matthewman
Planning Officer - Sustainable Places

Direct dial 01772 714065
e-mail nwnorthwestplanning@environment-agency.gov.uk