

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

Our ref: NO/2012/104629/01-L01
Your ref: 3/2012/1042

Date: 20 December 2012

Dear Sir/Madam

**PROPOSED CHANGE OF USE FROM VACANT SHOP PREMISES AND
DWELLING TO FORM 2 NO APARTMENTS - NO. 2 WALKER STREET,
CLITHEROE, LANCASHIRE, BB7 1NN.**

Thank you for consulting us on this application. The application site lies within Flood Zone 3 defined by the Environment Agency Flood Map as having a high probability of flooding. Unfortunately due to flood risk issues related to the site, our concerns are so significant that we object to the application.

Environment Agency position

Your authority should be satisfied that the sequential test and the exceptions test outlined in the National Planning Policy Framework have been applied and passed. Paragraph 100 of the NPPF states "Local Plans should apply a sequential, risk based approach to the location of development to avoid flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by: applying the Sequential Test".

When considering alternative sites, the search should include sites of a similar size and dwelling capacity to the one being tested, but also smaller sites which could cumulatively provide the same number of dwellings. Evidence that the tests have been carried out would need to be supplied alongside any planning application in flood zones 2 or 3 which are submitted to us for consultation. Once this is provided, we will offer you bespoke comments on the flood risk assessment (FRA).

In this particular case, we object to this application and recommend refusal of the planning application until a satisfactory FRA has been submitted. A quality FRA is vital if the local planning authority is to make informed planning decisions, but in this case a quality FRA is not provided.

Advice to Applicant

You can overcome our objection by undertaking an FRA which demonstrates that the development is safe without increasing risk of flooding elsewhere. If this cannot be achieved we are likely to maintain our objection to the application.

We will ask the LPA to re-consult us on the FRA once submitted. We recommend that you consider using flood passive proofing measures to reduce the impact of flooding when it occurs. Flood proofing measures include setting finished floor levels above the maximum flood level and integrating designed-in barriers/seals on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels. Consultation with your building control department is recommended when determining if flood proofing measures are effective.

Additional guidance can be found in our Floodline Publication 'Damage Limitation'. A free copy of this is available by telephoning 0845 988 1188 or can be found on our website www.environment-agency.gov.uk click on 'flood' in subjects to find out about, and then 'floodline'.

Reference should also be made to the Department for communities and local Government publication 'Preparing for Floods' a copy is available online at <http://www.planningportal.gov.uk/uploads/odpm/4000000009282.pdf>. The DCLG also have a guidance document called 'Improving the flood performance of new buildings' which can be viewed at: <http://www.communities.gov.uk/publications/planningandbuilding/improvingflood>

If you have any queries or need further advice, please contact either James Jackson on 01772 714134 or contact me directly using the details given below.

Yours faithfully

Dan Matthewman
Planning Officer - Sustainable Places

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