

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

Our ref: NO/2014/107052/01-L01
Your ref: 3/2014/0831
Date: 14 October 2014

Dear Sir/Madam

OUTLINE PROPOSAL FOR A RESIDENTIAL DEVELOPMENT OF AROUND 25 DWELLINGS

LAND OFF WHITEACRE LANE, WISWELL, BARROW, BB7 9BJ

Thank you for consulting us on the above application.

Environment Agency position

The application site is greater than 1 hectare and lies within Flood Zone 1, which is defined by the national Planning Practice Guidance to the NPPF as having a low probability of flooding. However the proposed scale of development may present risks of flooding on-site and/or off-site if surface water run-off is not effectively managed. In accordance with the NPPF, the application is accompanied by a Flood Risk Assessment (FRA).

We have reviewed the submitted FRA (Ref: 5792/R1, dated August 2014) and it does not comply with the requirements set out in section 10, paragraph 30 of the Flood Risk and Coastal Change category of the PPG to the NPPF. The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In the absence of an acceptable FRA, we therefore object to the grant of planning permission and recommend refusal on this basis for the following reasons:-

Reason

In particular, we have the following concerns:-

The FRA fails to clearly state where on-site flows in excess of the 1 in 30 year return period up to the 1 in 100 year plus climate change will be stored. There is a balancing

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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pond shown on the proposed surface water drainage strategy drawing (Ref: 5792/01-04), however this is not referred to in the FRA. The FRA should confirm the anticipated volume of surface water that would need to be stored on site up to the Q100 climate change event and identify how it will be stored.

Results of the site investigation will need to be provided to support the detailed drainage design to demonstrate that soakaways are not appropriate. If soakaways are not practicable, a balancing pond as shown on the illustrative site layout in the FRA must be incorporated to satisfy the sustainable drainage requirement in accordance with the NPPF.

If the applicants or agents wish to discuss this position with us, they should contact James Jackson on 01772 714134.

Overcoming our objection

You can overcome our objection by undertaking a FRA which demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we will consider whether there is a need to maintain our objection to the application. Production of a FRA will not in itself result in the removal of an objection.

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 re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Supplementary Informatives

We note that the FRA indicates that what is identified as a watercourse on the OS map is in fact a dry ditch that does not convey a flow. Following a site visit, we are also aware of a second potential watercourse along the southern boundary of the site. The applicant is strongly advised to seek the advice of Lancashire County Council in respect of these features and confirm with them whether or not they are defined as Ordinary Watercourses. Any works to the watercourses within or adjacent to the site which involve infilling, diversion, culverting or which may otherwise restrict flow, may require the prior formal Consent of the Lead Local Flood Authority under Section 23 of the Land Drainage Act 1991.

If this feature is defined by Lancashire County Council as an Ordinary Watercourse, infilling it will increase the risk of localised flooding and reduce flood storage capacity on site. If it is proposed to culvert the watercourse for land gain purposes, this too is likely to increase localised flood risk, reduce flood storage capacity and any future occupants of dwellings with a culvert within their cartilage will be responsible for the maintaining and repair of this structure.

As part of any subsequent site layout, and in the absence of any advice from the Lead Local Flood Authority, we strongly recommend that to the two watercourses crossing the site are retained to ensure that there is no net loss of flood storage capacity, unless their loss can be mitigated elsewhere on site on a like-for-like basis. We would recommend that the watercourses are incorporated into the site layout and, if necessary, the post development Greenfield run-off be discharged in to them to maintain flows.

A clear, unobstructed buffer between the edge of the watercourses and the proposed development should be incorporated in to the layout of the proposed development. The

buffer zone should be free from built development, including lighting, domestic gardens and formal landscaping. For maximum biodiversity benefit, the site layout should use watercourse(s) on site as a feature rather than a constraint. Watercourses can be integrated in to the layout as a positive feature by locating new built development in positions that overlook watercourses and including them within areas of public open space rather than hiding them behind gardens and fences.

A copy of this letter has been sent to the applicant/agent.

Yours faithfully

Mr Alex Hazel
Planning Advisor - Sustainable Places Team

Direct dial 01772 714065

E-mail: CLPlanning@environment-agency.gov.uk

cc Cass Associates