

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

**Our ref:** NO/2014/107312/02-L01  
**Your ref:** 3/2014/1007  
**Date:** 20 January 2015

Dear Sir/Madam

**CHANGE OF USE OF BARN TO DWELLING - REVISED FRA  
STARTIFANTS FARM, GOOSE LANE, CHIPPING, PRESTON**

Thank you for providing us with further information for the above, which we received on 5 January 2015.

**Environment Agency position**

We have reviewed the revised flood risk assessment (FRA) produced by ML Planning Consultancy Ltd and maintain our previous objection for the following reasons:

**Reason**

The FRA submitted with this application does not comply with the requirements set out in the Planning Practice Guidance to the National Planning Policy Framework. Therefore, the submitted FRA does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In particular the FRA is not acceptable because:

1. The FRA does not demonstrate that the property is not at risk from flooding from the 1 in 100 year plus climate change flood event. Our Flood Zone maps show that this property is at risk of flooding but the FRA does not provide any evidence to challenge this;
2. The FRA does not show how the property will be protected from the 1 in 100 year plus climate change flood event, and no flood protection is proposed;
3. The FRA does not consider how people will be kept safe from flood hazards identified;
4. The FRA does not consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event. The access and egress from the proposed development is in Flood Zone 3 and during flood events occupants would be

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Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.  
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[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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- trapped with no escape route. In addition, there is no route for the emergency services to reach the proposed development;
5. The FRA states that the existing ground level of the development site is approximately 3.5m higher than the adjacent watercourse. As a detailed topographical survey to Ordnance Datum has not been carried out there is no evidence to support this; and
  6. The FRA states that if the watercourse bank was overtopped then floodwater would flow west towards the highway rather than east towards the proposed dwelling. No evidence has been provided to support this statement.

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 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. If this cannot be achieved we are likely to maintain our objection to the application. Production of an 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 reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

Yours faithfully

**Mr Dave Hortin**  
**Planning Advisor - Sustainable Places Team**

Direct e-mail [clplanning@environment-agency.gov.uk](mailto:clplanning@environment-agency.gov.uk)

cc ML Planning Ltd