

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

**Our ref:** NO/2018/111175/01-L02  
**Your ref:** 3/2018/0750  
**Date:** 12 October 2018

Dear Sir/Madam

**CHANGE OF USE OF REDUNDANT BARN TO FORM ONE UNIT OF RESIDENTIAL ACCOMMODATION**

**TWITTER BRIDGE FARM BARN, TWITTER BRIDGE FARM, TWITTER LANE, WADDINGTON, BB7 3LG**

Thank you for consulting us on the above application.

**Environment Agency position**

In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

**Reasons**

The application site is located within Flood Zone 3 and Flood Zone 2 on the Environment Agency Flood Map for Planning. In the Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF), Flood Zone 3 is defined as having high probability of flooding and Flood Zone 2 as having a medium probability of flooding, and the proposal is for a change of use from 'less vulnerable' to 'more vulnerable' development.

In accordance with the NPPF, development proposed in Flood Zone 3 or 2 should be accompanied by a FRA appropriate to the nature and scale of the proposed development.

We have reviewed the FRA and it does not comply with the requirements set out in Paragraph 030 (Reference ID: 7-030-20140306) of the Flood Risk and Coastal Change category of the national PPG. The submitted FRA does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

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

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In particular, the submitted FRA fails to:

1. Identify the correct flood zones and the flood hazards applicable to the development. Flood risk information can be obtained from us free of charge (advice provided below)
2. Consider how people will be kept safe from flood hazards applicable to the site.
3. Take climate change into consideration for the lifetime of the development.
4. Consider the effect of a range of flooding events including extreme events on people and property.
5. Consider the requirement for flood resistance and resilience measures to protect people and property from flooding. This includes consideration of whether raising the ground floor level internally is possible.
6. 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.
7. Include topographical survey data and levels to metres above Ordnance Datum (mAOD).

### **Overcoming our objection**

It may be possible to overcome our objection if a FRA is submitted that covers the deficiencies highlighted above. The FRA must demonstrate that the development is safe for its lifetime (including climate change impacts) without increasing risk elsewhere and where possible reduces flood risk overall.

A satisfactory FRA is vital if the local planning authority is to make informed planning decisions.

We ask to be re-consulted on the FRA, and 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.

### **Advice to applicant**

The site is not in an area which benefits from our Flood Warning Service.

### Guidance for preparing FRAs

FRAs should be appropriate to the nature and scale of the proposed development, and undertaken by someone who understands how to use the available evidence to assess the risk in accordance with national guidance. The following guidance is available on the GOV.UK website for use when preparing flood risk assessments for planning applications:

- <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.
- <https://www.gov.uk/guidance/flood-risk-and-coastal-change>
- <https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-risk-raised-by-change-of-use>

In particular, we would recommend that the author of the FRA uses the site-specific FRA checklist covered in paragraph 068 of the PPG for Flood Risk and Coastal Change to ensure the FRA content complies with the relevant advice. This can be found on the GOV.UK website at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Site-Specific-Flood-Risk-Assessment-checklist-section>

## Flood risk information (flood levels)

The applicant can submit a request to our Customers and Engagement team to obtain what flood risk information (e.g. a Product 4 package) we have to inform their FRA. This service is now available free of charge. Requests can be sent to [Inforequests.cmbInc@environment-agency.gov.uk](mailto:Inforequests.cmbInc@environment-agency.gov.uk).

For further information on what flood risk information packages we offer please refer to the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#get-information-to-complete-an-assessment>

## **Environment Agency planning advice**

If the applicant requires further detailed planning advice from us following our response to this application, we may be able to provide this through our voluntary charged for service. Any request for planning advice should be submitted to [clplanning@environment-agency.gov.uk](mailto:clplanning@environment-agency.gov.uk). We will review the request and where appropriate, we will provide a written offer based on our planning advice charges of £100 per person per hour (plus VAT). We will not undertake any additional work until an offer has been accepted.

We will be unable to offer this service where we consider that a request is unreasonable, goes beyond what we can advise on through our planning remit or where other operational activities and issues prevent us from doing so.

Yours faithfully

**Mr Alex Hazel**  
**Planning Advisor – Sustainable Places**

E-mail: [CLPlanning@environment-agency.gov.uk](mailto:CLPlanning@environment-agency.gov.uk)