

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

Our ref: NO/2019/112110/02-L01
Your ref: 3/2019/0840
Date: 18 December 2019

Dear Sir/Madam

**EXTENSION TO EXISTING WORKSHOP AND CREATION OF PARKING AREA.
JAMES ALPE LIMITED LINCOLN WAY, CLITHEROE, LANCASHIRE, BB7 1QD.**

Thank you for consulting us on the above application which we received 28 November 2019.

Environment Agency Position

We have reviewed the latest FRA for this proposal, reference QFRA 1198, version 1.1, dated 26 November 2019.

Unfortunately the minor alterations made to the previous FRA do not cover the requirements of a site specific flood risk assessment. Due to the absence of an acceptable Flood Risk Assessment (FRA) and the proposal to erect a fence and provide car parking within 8 metres of a Main River, we object to this application and recommend that planning permission is refused. As submitted, it is unlikely that we would grant a flood risk activity permit for this application

Flood Risk

Reasons

The submitted FRA does not adequately assess the development's flood risks and therefore does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance.

Specifically, the FRA fails to:

- Properly assess the increased flood risk associated with infilling the floodplain. The proposed car park within the floodplain will reduce the flood storage capacity of the river and will increase flood risk to adjacent properties. Infilling the floodplain will only be permitted if compensatory flood storage is provided and flood risk is not increased.
- Properly understand and assess the risks of erecting wire mesh fencing within the floodplain and next to the river. The proposed fencing will impede overland flood flow which will increase flood risk to adjacent properties.
- take the impacts of climate change into account

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

- consider how people will be kept safe from the identified flood hazards
- consider how a range of flooding events (including extreme events) will affect people and property
- 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.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA and we will respond within 21 days of receiving it.

Environmental Permitting

Reason(s)

- The proposed development would restrict essential maintenance and emergency access to the Main River watercourse. The permanent retention of a continuous 8 metre wide unobstructed area is an essential requirement for future maintenance and/or improvement works.
- The proposed development would obstruct flood flows, thereby increasing the risk of flooding to adjacent properties
- The construction of the car park adjacent to the river may interfere with natural geomorphological processes and could be placed at risk of damage arising from channel migration/erosion.

Environmental permit - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of the top of the riverbank of a main river
- on or within 8 metres of a flood defence structure or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

In this particular instance, the Environment Agency would be unlikely to issue a permit for this proposed development.

Note to applicant

Should you wish us to review any technical documents, e.g. a Flood Risk Assessment, or want further advice to address the flood risk issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential solutions to flood risk issues, before formally submitting an FRA as part of a further planning application.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help

resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The terms and conditions of our charged for service are available [here](#).

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.

If you would like more information on our planning advice service, including a cost estimate, please contact us at the following email address; clplanning@environment-agency.gov.uk

Yours faithfully

Carole Woosey
Planning Advisor

E-mail clplanning@environment-agency.gov.uk