

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

Our ref: NO/2020/112543/01-L01
Your ref: 2/2020/0112
Date: 06 April 2020

Dear Sir/Madam

**DEMOLITION AND REBUILD OF EXISTING DWELLING AND ERECTION OF
NEW ADDITIONAL DWELLING.
GLENCROFT, PENDLE AVENUE, CHATBURN. BB7 4AX**

Thank you for consulting us on the above application which we received 17 March 2020.

Environment Agency position

The proposed development site is located across flood zones 1, 2 and 3 on the Environment Agency's Flood Map for Planning and Heys Brook, Main River flows through the site. The proposed new dwelling and rebuild of the existing dwelling would be located in flood zones 1 and 3.

We have reviewed the submitted FRA, produced by Earth Environmental and Geotechnical Ltd, dated September 2019. In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA 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. The FRA does not therefore adequately assess the flood risks posed by the development.

In particular, the FRA fails to:

- Assess the impact of climate change on fluvial flood risk using appropriate climate change allowances for the north west basin, for 'more vulnerable' development (please refer to: ['Flood risk assessments: climate change allowances'](#) for information relating to climate change allowances).
- Provide adequate detail relating to the need for compensatory storage, and how this will be undertaken.

Overcoming our objection

The submitted flood risk assessment states that compensatory storage will be provided, however there is little justification for this requirement. If there is to be

alteration of ground levels within the area of Flood Zone 3, that would necessitate the provision of compensatory storage, this should be clearly stated. If ground levels are being raised within flood zone 3, compensatory storage will be required on a level-for-level basis. If levels are not being altered, and fluvial flood water could move as it does currently over the site in the area of flood zone 3 (including under the finished floor level), compensatory storage will not be required. If compensatory storage is required, further detail must be submitted, including where the excavated soil would be placed and the volume of storage to be provided at each level.

In addition to the above, the application has considered the 0.1% AEP fluvial flood event, but has not justified the reasoning behind not using climate change allowances.

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 re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Sequential test - advice to the LPA

In accordance with the National Planning Policy Framework (paragraph 158), development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

It is for the local planning authority to determine if the sequential test has to be applied and whether or not there are other sites available at lower flood risk. Our flood risk standing advice reminds you of this and provides advice on how to apply the test.

Yours faithfully

Carole Woosey
Planning Advisor

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