

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

Our ref: NO/2020/112543/02-L01
Your ref: 3/2020/0112
Date: 22 June 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 2nd June 2020.

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused. Please find our detailed comments in relation to the FRA below.

We have reviewed Revision C of the FRA (Earth Environmental and Geotechnical Ltd, May 2020) which supports application 3/2020/0112, which has not yet been uploaded to the LPA planning portal.

The 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 dwelling and rebuild of the existing dwelling would be located in flood zones 1 and 3. Whilst climate change allowances have not been explored, the 1,000-year return period has been explored which is considered satisfactory at this location.

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:

- Provide adequate finished floor levels for the proposed dwelling to protect against the lifetime of the development.
- Inadequate information has been provided in relation to compensatory storage

The FRA has outlined the finished floor levels of the extension of the existing dwelling will be the same as the existing building, this is considered to be acceptable. The proposed dwelling will have finished floor levels of 102.76mAOD, this provides 300mm above the 100-year and 1,000-year return period levels. The 100-year and 1,000-year return period extents for the proposed dwelling are about the same, as such we would

Environment Agency
Sustainable Places Cumbria and Lancashire for following this up
clplanning@environment-agency.gov.uk

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expect the FFLs to be, as a minimum of whichever is higher of:

- 300 millimetres (mm) above the general ground level of the site
- 600mm above the estimated river or sea flood level

The FFL for the proposed dwelling does not comply with this.

It is currently unclear whether compensatory storage will be required for this development. Compensatory storage is not required for the footprint of the proposed dwelling and extension. However, if ground levels are raised outside of the footprint of the buildings, compensatory storage would be required. If ground levels will not be raised outside the footprint of the building, this must be clearly stated within the flood risk assessment.

If it is deemed necessary to provide compensatory storage, the area provided must be connected to the existing area of Flood Zone 3 and be able to function as part of the floodplain.

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

Sequential test - advice to 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

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