Ribble Valley Borough Council Development Control Council Offices Church Walk Clitheroe Lancashire BB7 2RA Our ref:NO/2020/112855/03-L01Your ref:3/2020/0601

Date: 02 December 2020

Dear Sir/Madam

## OUTLINE PLANNING FOR THE CONSTRUCTION OF UP TO 125 DWELLINGS WITH PUBLIC OPEN SPACE, LANDSCAPING AND SUSTAINABLE DRAINAGE SYSTEM AND VEHICULAR ACCESS POINT FROM HIGHMOOR PARK. ALL MATTERS RESERVED EXCEPT FOR MEANS OF ACCESS. LAND AT HIGHMOOR FARM, CLITHEROE, BB7 1PN

Thank you for consulting us on the above application which we received 12 November 2020.

### **Environment Agency position**

In the absence of an acceptable flood risk assessment (FRA) we maintain our objection 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:

 Provide details of the proposed raising of the banks of the watercourse/flood defences. No assessment has been made to consider whether the scheme is feasible, or whether it would impact people and property elsewhere

## Overcoming our objection

To overcome our objection, the applicant should provide further detail and assessment of the proposed flood defence or raising of the banks of the river. The area of the site located in flood zone 2 must also be acknowledged.

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.

### Assessment of Flood Risk – Information for LPA/applicant

The FRA states throughout, that the site is located in flood zone 1. There is however, a small area of the site located in flood zone 2 to the south-west which must be acknowledged.

The revised FRA has further assessed the 70% climate change allowance to Shaw Brook, Main River. This the higher allowance of the 35% and 70% allowances which should be assessed as part of the flood risk assessment (as advised in <u>'Flood risk assessments: climate change allowances'</u>).

The FRA states that the banks of the watercourse will be raised or flood defences will be put in place to accommodate the 1 in 100-year event with 70% climate change allowance. Inadequate information has been submitted in relation to design, feasibility and assessment regarding the impact on property and people elsewhere.

It is recommended that the 100-year fluvial flood event with 35% allowance for climate change level for Shaw Brook is also assessed. The modelled levels should form part of the fluvial flood risk assessment for the site, the assessment should also include analysis of flood depths, extents etc. and the risks these pose. Mitigation measures implemented must not increase flood risk to people and property elsewhere.

Yours faithfully

# Carole Woosey Planning Advisor

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