

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

**Our ref:** NO/2020/112855/04-L01  
**Your ref:** 3/2020/0601  
**Date:** 24 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 10 December 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.

**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 details of the proposed raising of the banks of the watercourse and compensatory storage scheme. Inadequate assessment has been made to consider whether the scheme is feasible, or whether it would impact people and property elsewhere. We are unable to state whether or not the proposed scheme is acceptable to the Environment Agency based on the information currently supplied.
- Provide flood risk mitigation measures to address flood risk for the lifetime of the development, including safe access and egress routes

**Overcoming our objection**

To overcome our objection, the applicant should provide further detail and assessment of the proposed river bank raising and compensatory storage scheme. Access and egress routes in the event of a flood must also be outlined.

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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## **Flood Risk Assessment - Information for the LPA/applicant**

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

The FRA and supporting information details that the banks of the watercourse will be raised and a compensatory storage scheme will be put in place to reduce the flood extent on site in the 1 in 100-year event with 70% climate change allowance added. The impact of the proposed raised banks is unclear on the flood risk to the surrounding area and therefore it is unclear whether the compensatory storage is adequate and how it would work. At this stage, inadequate information has been submitted in relation to design, feasibility and assessment on the impact of property and people elsewhere. As a result we are unable to assess whether the proposed works would be acceptable. The applicant should submit modelling information and further detail to support the proposed works.

We also note that the above mentioned works may be disproportionate to the scale of flooding on the development scheme. As outlined in previous comments, it is recommended that the 100-year fluvial flood event with 35% allowance for climate change level for Shaw Brook is also assessed. These 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. Access and egress routes to the site in a flood event must also be detailed within the FRA.

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.

Yours faithfully

**Carole Woosey**  
**Planning Advisor**

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