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

Our ref:	NO/2020/112855/01-L01
Your ref:	3/2020/0601

Date: 21 August 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 11 August 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.

Whilst the FRA has assessed fluvial flood risk over the majority of the site, according to the Environment Agency's Flood Map for Planning, there is a small area at the point of access to the site located in flood zone 2. Due to the close proximity of Shaw Brook and the flood risk it poses to the primary access point of the site, the future flood zone 3 and therefore the impact of climate change must be assessed in more detail.

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:

• take the impacts of climate change into account at the access point to the site

There is no assessment of the impact of climate change using appropriate climate change allowances. Further information of climate change allowances can be found in the associated PPG <u>'Flood risk assessments: climate change allowances'</u>. As a result there may be inadequate safe access and egress routes as the flood risk for the lifetime of the development has not been assessed.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which assesses the impact of climate change on flood risk at the access point to the site over the life time of the development.

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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