

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

**Our ref:** NO/2020/112855/02-L01  
**Your ref:** 3/2020/0601  
**Date:** 11 November 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 22 October 2020.

**Environment Agency position**

We have reviewed the submitted FRA produced by Topping Engineers, reference 18522, dated August 2019.

The revised FRA has assessed the 30% climate change allowance to Shaw Brook, Main River, however this allowance does not comply with those advised in '[Flood risk assessments: climate change allowances](#)' and its use has not been justified. The area of the site off Highmoor Park road is located partially in and adjacent to the flood zone. As a result of this, areas of the site may be located in the future flood zone 3 and the impact of future climate change on the risk of flooding must be assessed further.

Therefore, in the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused at this stage.

**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.
  - Different climate change allowances have been used to assess future flood risk than those advised in '[Flood risk assessments: climate change allowances](#)', without adequate justification. As a result, there may be inadequate safe access and egress routes to the site as the flood risk for the lifetime of the development has not been assessed.

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)

Cont/d..

**Overcoming our objection**

To overcome our objection, the applicant should submit a revised FRA which assesses the impact of climate change in line with the recommended climate change allowances 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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