

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

Our ref: NO/2020/112925/02-L01
Your ref: 3/2020/0602
Date: 18 May 2021

Dear Sir/Madam

CREATION OF ADDITIONAL DINING SPACE, A BAKERY DELI FOOD SALES AREA WITH STORAGE AND OFFICE FACILITIES. ADDITIONAL TERRACE DINING WITH STORAGE BELOW.
HOLDEN CLOUGH NURSERY, BOLTON BY BOWLAND ROAD, BOLTON BY BOWLAND, BB7 4PF

Thank you for consulting us on the above application which we received 28 April 2021.

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 development's flood risks. In particular, the FRA fails to:

- take the impacts of climate change into account
- consider how people will be kept safe from the identified flood hazards
- consider how a range of flooding events (including extreme events) will affect people and property
- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event.

Detailed comments;

The proposed development to the east side of the building will be at risk of fluvial flooding, it is understood from information submitted, the ground floor will not be habitable (used for storage) with a terrace associated to the business on the first floor. Whilst not mentioned within the FRA, the proposed and existing elevations appear to show that there will be ground level raising within the 1% AEP plus climate change allowance extent, the impact of this has not been assessed.

The FRA submitted is inadequate and does not comply with guidance within the PPG and NPPF. In order to be acceptable the FRA should contain the following additional information;

- Flood risk must be assessed for the lifetime of the development. This means that climate change must be considered in line with Planning Practice Guidance. As such, the North West river basin district climate change allowances, for the vulnerability class and design life of the development must be considered. Currently the correct climate change levels have not been considered in the FRA, which detailed sea level allowances. These are not relevant in this location as the watercourse is not tidally influenced.
- The proposed and existing elevations show that there is likely to be ground level alterations within the 1% AEP plus climate change extent which have not been assessed. Raising of ground levels within the flood plain would result in loss of flood plain storage which is likely to increase flood risk elsewhere. This would be contrary to Paragraph 155 of the NPPF. Please confirm whether ground levels will be raised, if so, this must be assessed within the FRA, including the extent and impact of any loss of flood plain storage. If this is proposed, compensatory storage must be provided on a level-for-level basis for the 1% AEP plus allowance for climate change extent.
- Safe access and egress to the development must be detailed.

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 consult us on any revised FRA and we will respond within 21 days of receiving it.

Advice to applicant- compensatory storage

For your given location the flood risk mapping is derived from modelling produced in 2004 (known as JFLOW) which was the first year of publication for our Flood Zones mapping. The underlying topographic data utilised in the 2004 mapping study was coarse (low resolution). The accuracy of the underlying terrain data has improved greatly since the early 2000s. Due to the coarse nature of the available modelling, the compensatory storage assessment is likely to need to be supported by detailed hydraulic modelling to inform the level-for-level assessment of replacement of flood storage.

Advice to LPA/Applicant

Due to the risk of flooding, it is strongly recommended that an emergency evacuation plan is prepared by the applicants and reviewed by relevant planning consultees.

Advice to applicant

The FRA details that flooding has not been observed at the site in living memory, please note, this does not eradicate the potential risk of flooding to the site and building for flood events of a greater magnitude than has been experienced in the past.

Advice to LPA/Applicant

The proposed site plan shows a line indicating incorrect flood zones, please refer to our previous comments dated 21st September 2020 for further detail.

Yours faithfully

Carole Woosey
Planning Advisor

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