

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

Our ref: NO/2021/113355/03-L01
Your ref: 3/2021/0205
Date: 20 September 2021

Dear Sir/Madam

**ERECTION OF 36 RESIDENTIAL DWELLINGS, ALONG WITH LANDSCAPING AND ASSOCIATED SITE INFRASTRUCTURE.
LAND AT NEDDY LANE, BILLINGTON, BB7 9LL**

Thank you for consulting us on the above application which we received 31 August 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 flood risks posed by the development. In particular, the FRA fails to:

- take the impacts of climate change into account
- address flood risk for the lifetime of the development, the measures included in the design are inadequate because they will not make the development resilient to the flood levels for a 1% AEP plus 36% allowance for climate change event (0.1% AEP levels are being used as proxy).

Consequently the development proposes:

- Inadequate flood storage compensation

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 re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Detailed comments.

The proposed development has used the 0.1% Annual Exceedance Probability (AEP) extent and levels as a proxy for the 1% AEP plus climate change allowance in this FRA. This is satisfactory in this location.

The development scheme proposes increasing ground levels within the 0.1% AEP event. Therefore a compensatory storage scheme has been proposed which results in a marginal betterment in flood storage as shown in drawing 20023-SK07 E, however the proposed design of the scheme is not considered to be acceptable.

The proposed storage area is connected by a restrictive channel design which cuts through an area of higher ground. This connection reduces the hydraulic and hydrological connection to the existing flood plain which the EA does not support. In addition, as flood water drains from the flood plain, sediment often gets deposited. Over time, this deposition would increase ground levels and is likely to result in sediment build up in the narrow channel which would prevent water flowing into the storage area. There is also ground level lowering proposed within the existing floodplain as part of the storage scheme. For similar reasons as above, this is not supported as it is likely that there would be a continuous standing water level, or sediment build up that would reduce the flood plain storage volume.

We would generally encourage where possible, the re-contouring of the land adjoining a floodplain. This is to allow development without increasing, and ideally reducing, overall flood risk.

For schemes such as the one proposed, maintenance must be considered. However, maintenance and the continued regulation of such a scheme is considered to be onerous and the scheme would need to be supported by a maintenance regime, funding and would be likely to need legal agreements to protect the area from future development.

We also request that the applicant provide clarification of whether the proposed SUDs scheme is located within the 0.1% AEP extent and whether ground level raising in this area has been considered in the design of the proposed flood storage scheme. If so, this must also be considered when designing the compensatory storage scheme and the SUDs scheme should not be located within the fluvial flood plain.

Movement of culverted watercourses - Advice to applicant

The matter of culverting and rerouting the ordinary watercourses should be discussed with the Lead Local Flood Authority – Lancashire County Council.

Sequential test - advice to LPA

In accordance with the National Planning Policy Framework (paragraph 162), development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

It is for the local planning authority to determine if the sequential test has to be applied and whether or not there are other sites available at lower flood risk. Our flood risk standing advice reminds you of this and provides advice on how to apply the test.

Yours faithfully

Carole Woosey
Planning Advisor

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