

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

Our ref: NO/2021/113355/02-L02
Your ref: 3/2021/0205
Date: 21 April 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 25 March 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 (PPG).

The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- 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
- Take the impacts of climate change into account
- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for 2080s “upper end or higher/central” scenarios (70% and 35% respectively, or the 1,000-year return period in this location, as already used within the FRA). Consequently the development proposes inadequate;
 - Flood storage compensation
 - Raised finished floor levels
 - Resistance and resilience measures
 - Safe access and egress routes

Overcoming our objection

We have provided detailed comments regarding the deficiencies in the FRA below. To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above with reference to the comments that follow. If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

Flood Risk Assessment – detailed comments

Climate Change

The proposed development has used the 1,000-year extent and levels as a proxy for the 100-year plus climate change allowance in the FRA. This is satisfactory in this location.

Compensatory Storage Scheme

A number of components of the compensatory storage scheme are unclear. The developer must ensure that flood risk will not be increased on site and elsewhere for the lifetime of the development (i.e. factoring in climate change). It appears that the compensatory storage scheme is based on the 100-year return period extent, as the upper level of 43.34mAOD has been used in the volume calculations, which is the 100-year fluvial flood level on site.

Drawing No 20023-SK02-C appears to show ground level raising within the 1000-year extent (which as stated above, has been used as the climate change allowance figure). Allowance for this has not been included within the compensatory storage scheme. As such, the ground level raising within this area will result in increasing flood risk elsewhere within the lifetime of the development, the Environment Agency will not support this.

Boundary Treatments Within the Floodplain

Clarity needs to be provided regarding the compensatory storage scheme, however it appears that the boundary treatments show that boarded fencing will be used within the 1,000-year extent. This means that the free flow of water will be restricted within the floodplain.

Finished Floor levels

As per the EA's standing advice, it is expected that finished floor levels should be a minimum of whichever is higher of:

- 300mm above the general ground level of the site
- 600mm above the estimated river or sea flood level (1% AEP plus climate change allowance).

Whilst the FRA has not provided finished floor levels in line with the above, all proposed finished floor levels will be at or above this level, aside from one Harl house to the north-west of the site as shown in 20023-SK02-C. This property should be raised in line with the advice above, and the FRA amended to reflect this.

Other Concerns

- Although there has been a brief mention of flood resistance and resilience measures in paragraph 4.7.1, there has been no detail provided of these or residual flood risk which must be considered.
- There has been no assessment of access and egress to the site.

Advice to applicant - Movement of culverted watercourses

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

Environmental permit - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Yours faithfully

Carole Woosey
Planning Advisor

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