

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

Our ref: NO/2020/112925/03-L01
Your ref: 3/2020/0602
Date: 03 September 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 16 August 2021.

Environment Agency position

The proposed and existing elevations submitted with this application show that there are likely to be ground level alterations within the 1% AEP plus climate change extent. The impact of ground level raising within the flood plain is likely to result in loss of flood plain storage and/or impeding of flows is likely to increase flood risk elsewhere. This would be contrary to Paragraph 155 of the NPPF.

Whilst not mentioned within the FRA, the proposed and existing elevations show discrepancies between existing and proposed ground levels, the impact of this has not been confirmed or assessed. The applicant should confirm whether ground levels will be raised, and if this is the case, 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.

Therefore, 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:

- Consider the impact of the development on flood risk to the site and elsewhere for the lifetime of the development. Consequently the development proposes inadequate flood storage compensation.

- Fails to assess the impact of climate change. We note that the climate change allowances stated within the FRA are incorrect for the site as these are the sea level climate change allowances. These are not relevant in this location, as the watercourse is not tidally influenced.

The proposed development to the east side of the building will be at risk of fluvial flooding, it is understood from information submitted that the ground floor will not be habitable (used for storage), with a terrace associated to the business on the first floor. The additional supporting information submitted accepts that the property will flood and the applicant has provided an evacuation plan. The adequacy of this plan is not within the remit of the Environment Agency to assess.

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.

Compensatory Storage - Advice to applicant

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 2000's. 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 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 those 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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