

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

**Our ref:** NO/2021/113773/01-L01  
**Your ref:** 3/2021/0690  
**Date:** 01 September 2021

Dear Sir/Madam

**PROPOSED CREATION OF CAR PARKING (INCLUDING LIGHTING) AND AREA OF  
SOFT LANDSCAPING TO REDUNDANT LAND BEHIND STANDS.  
CLITHEROE FOOTBALL CLUB, SHAWBRIDGE STREET, CLITHEROE, BB7 1LZ.**

Thank you for consulting us on the above application which we received 05 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.

The development is located within flood zone 3, an area at high risk of flooding. It is unclear whether ground levels have been altered and there has been little assessment of the impact the proposed works would have on flood risk. If ground levels have been raised, this is likely to displace water within the floodplain and increase flood risk elsewhere which is contrary to the NPPF.

**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:

- 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. There is no assessment of the impact of climate change using appropriate climate change allowances. Please refer to '[Flood risk assessments: climate change allowances](#)' for more detail.

**Overcoming our objection**

To overcome our objection, the applicant should provide ground levels for the site both pre and post development. They should also submit a revised FRA which addresses

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)

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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.

Yours faithfully

**Carole Woosey**  
**Planning Advisor**

E-mail [clplanning@environment-agency.gov.uk](mailto:clplanning@environment-agency.gov.uk)