

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

Our ref: [REDACTED]
Your ref: 3/2022/0176
Date: 14 April 2022

Dear Sir/Madam

**EXTENSION OF THE EXISTING FOOD STORE AND THE PROVISION OF NINE
STAFF CAR PARKING SPACES.
LIDL, SHAWBRIDGE STREET, CLITHEROE, BB7 1LZ**

Thank you for consulting us on the above application which we received 24 March 2022

Environment Agency position

The application site is located within Flood Zone 3 on the Environment Agency Flood Map for Planning. In the Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF), Flood Zone 3 is defined as having high probability of flooding.

We have reviewed the submitted Flood Risk Assessment, produced by Topping Engineers, referenced 22045-FRA-001, Revision A, Jan 2022, in so far as it relates to our remit, and we object to the proposed development on flood risk grounds, due to the absence of an adequate flood risk assessment.

Reasons

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:

- State the anticipated flood levels on site and how these relate to the proposed finished floor levels and stated property level resilience measures.

The FRA acknowledges that the proposed extension will be located partly in Flood Zone 3 as shown on the agencies Flood Map for planning. However, it fails to provide further detail as to the risk associated and how it may impact the proposed development. We suggest that you submit a request to us for an up to date Product 4 flood risk information package which is applicable to this site to inform your FRA. This information

Environment Agency
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.

[REDACTED]
www.gov.uk/environment-agency
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is free of charge and requests can be sent to Inforequests.cmbinc@environment-agency.gov.uk.

Using this data, the FRA should state what the finished floor level of the building will be (we expect that this will be the same as the existing building, but this information is not supplied) and whether the building will experience flooding, and to what depth. Sufficient mitigation should be provided to ensure the building can remain safe for its users and occupiers before, during and after a flood event.

Overcoming our objection

The applicant can overcome our objection by submitting a revised FRA and supporting plans which address the deficiencies highlighted above. The FRA must satisfactorily demonstrate that the development will be safe for its lifetime without increasing risk elsewhere and where possible reduces flood risk overall.

We ask to be re-consulted with the results of any revised FRA and we will provide you with bespoke comments within 21 days of receiving formal re-consultation.

Environmental permit - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit 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 culvert (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 03702 422 549. 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.

Flood warning and emergency response - advice to LPA

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The [planning practice guidance](#) to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the Planning Practice Guidance (PPG).

Yours faithfully

