

Mr Stephen Kilmartin
Ribbles Valley Borough Council
Development Control
Council Offices Church Walk
Clitheroe
Lancashire
BB7 2RA

Our ref: NO/2023/115288/01-L01
Your ref: 3/2023/0272
Date: 01 June 2023

Dear Mr Kilmartin

DEMOLITION OF DETACHED COLLAPSED STORAGE BUILDING AND ERECTION OF ONE TWO-STOREY DWELLING WITH PRIVATE GARDEN AND PARKING AREAS. ERECTION OF A TWO STOREY OUTBUILDING, PROVIDING GARAGE AND HOBBY ROOM SERVING TWINBROOK BARN. TWINBROOKS BARN, UP BROOKS, CLITHEROE, BB7 1PL

Thank you for consulting us on the above application which we received 16 May 2023.

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 planning application is accompanied by a Flood Risk Assessment (FRA) prepared by GeoSmart Information Ltd. referenced; 74970.00.01R1, dated 2023-03-17. We have reviewed the FRA in so far as it relates to our remit, and we are not satisfied that the development would be safe without exacerbating flood risk elsewhere.

The FRA confirms that; 'As the development proposals involve the increasing of building footprint within the fluvial Flood Zones, compensatory storage will be required, this should be achieved through level for level compensation or where this is not feasible through use of voids.'

No calculation of lost flood plain storage requiring to be compensated for is stated as part of the FRA, and no other proposals are provided in any other supporting documents.

Reasons

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular:

- Flood risk mitigation measures to address flood risk for the lifetime of the

development included in the design are inadequate, because they do not demonstrate that the development will not increase flood risk elsewhere during the design flood event considered.

- The FRA 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.

Given that the land parcel includes areas of higher ground in Flood Zone 1 and Flood Zone 2, it should be technically feasible to provide level for level compensation. CIRIA 624 (Development and flood risk – guidance for the construction industry - Section A.3.3.10, 2004) states that:

“Compensatory flood storage must become effective at the same point in a flood event as the lost storage would have done (McPherson 2002). It should therefore provide the same volume and be at the same level relative to flood level, as the lost storage”

If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

Yours sincerely

Carole Reynolds
Planning Advisor

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