

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

**Our ref:** NO/2023/115662/03-L01  
**Your ref:** 3/2023/0754  
**Date:** 11 June 2024

Dear Ms. Hughes

**PROPOSED CHANGE OF USE OF AGRICULTURAL LAND TO NEWCAR PARK  
AND STORAGE YARD.  
JUDGE WALMSLEY MILL, LONGWORTH ROAD, BILLINGTON, BB7 9TP**

Thank you for consulting us on the above application which we received 29 May 2024.

In our letter referenced NO/2023/115662/01-L01 and dated 29<sup>th</sup> November 2023, we objected to the development as proposed in the absence of an acceptable Flood Risk Assessment (FRA).

In our letter referenced NO/2023/115662/02-L02 and dated 18<sup>th</sup> January 2024, we maintained our objection to the development as the FRA failed to:

- Identify pre- and post-development ground levels
- Evidence that there will be no displacement of flood plain storage
- Demonstrate that the proposal will not increase flood risk off site
- 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

We also directed that the FRA should follow the “Guidance on how to prepare a flood risk assessment” which can be found at:-

<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

This guidance states that ‘the design flood must include an appropriate [allowance for climate change](#)’.

The product 4 data included in the FRA also includes the following:

*‘The climate change data included in the models may not include the latest flood risk assessment climate change allowances. Where the new allowances are not available you will need to consider this data and factor in the new allowances to demonstrate the development will be safe from flooding.*

*The Environment Agency will incorporate the new allowances into future modelling studies. For now, it’s your responsibility to demonstrate that new developments will be safe in flood risk terms for their lifetime.’*

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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## **Environment Agency position**

The applicant has now submitted a document entitled Proposed New Car Park & Storage Yard, Billington Flood Risk Assessment- Revised March 2024, referenced T3947-FRA-01 – Rev A. We have reviewed the document and unfortunately, it fails to satisfactorily answer the points we raised in our previous objection. We therefore maintain our objection, as different climate change allowances have been used to assess future flood risk than those advised in 'Flood risk assessments: climate change allowances', without adequate justification, and consequently, the design flood level is likely to have been underestimated.

For the appropriate climate change allowances see:

<https://environment.data.gov.uk/hydrology/climate-change-allowances/river-flow>. The Central, 2080's peak river flow allowances for Ribble Management Catchment peak river flow allowances of 36% should be applied for the proposed lifetime of the development.

The planning policy guidance includes the following for the definition of a design flood:

### **What is meant by a “design flood”?**

This is a flood event of a given annual flood probability, which is generally taken as:

- river flooding likely to occur with a 1% annual probability (a 1 in 100 chance each year); or
- tidal flooding with a 0.5% annual probability (1 in 200 chance each year); or
- surface water flooding likely to occur with a 1% annual probability (a 1 in 100 chance each year),

plus, an [appropriate allowance for climate change](#).

Without appropriate climate change allowances, the design flood event including the depth, velocity and duration of any flooding may be underestimated. As the proposals include significant capital investment to the client the full picture of flood risk should be assessed appropriately.

In the absence of detailed hydraulic modelling including the 36% Ribble Management Catchment peak river flow allowances, we would recommend an Intermediate approach whereby the developer can use existing modelled flood and flow data to construct a stage-discharge rating curve, which can be used to interpolate a flood level based on the required peak flow allowance to apply to the 'design flood' flow. Alternatively, and taking a more precautionary approach, we would accept that the developer uses the 0.1 % AEP event as peak river flow climate change proxy as the design flood event, while acknowledging that in the NW River Basin District this would equate more closely to the 70% allowance.

### **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 re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

### **Additional information**

The FRA refers to levelling of the site and the volumetric flood risk storage benefits this would present. This would only be acceptable if the developer confirms that any material generated from this process will be moved from the current and future flood

plain (Flood Zone 3 plus Climate change allowance i.e. the design flood extent)

Yours sincerely

**Carole Reynolds**  
**Planning Advisor**

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