

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

Our ref: NO/2025/116529/01-L01
Your ref: 3/2024/0834
Date: 24 January 2025

Dear Mr Kilmartin

**PROPOSED CONVERSION OF AN EXISTING RETAIL UNIT WITH ACCOMMODATION AT FIRST FLOOR OVER INTO A BOUTIQUE HOTEL WITH RESTAURANT INCLUDING THREE-STOREY EXTENSION TO SIDE, TWO AND THREE STOREY EXTENSIONS TO REAR, BUILDING UP AND EXTENSION OF EXISTING REAR OUTRIGGERS WITH ADDITION OF WINDOWS AND ROOFLIGHTS, ROOF TERRACES, NEW FLUE ABOVE RIDGE LEVEL, NEW BIN STORE TO SIDE, NEW BOUNDARY TREATMENT TO SIDE AND REAR AND USE OF LAND TO FRONT AND SIDE FOR OUTDOOR DINING.
69 KING STREET, WHALLEY, BB7 9SW**

Thank you for consulting us on the above application which we received 13 January 2025

The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Maplebrook Environmental Consultants, referenced; Report QA Number 24/03a and dated October 2024.

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 if the proposed flood risk mitigation measures are implemented.

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.

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, the FRA fails to:

- consider how a range of flooding events (including extreme events) will affect people and property.
- Take the impacts of climate change into account.

Our detailed comments regarding these points can be found below:

Environment Agency
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.
Customer services line: [REDACTED]

Cont/d..

The proposal description includes the statement 'Reinstate the Existing Wall': as part of the redevelopment, it is proposed that the existing wall that surrounds the site adjacent to George Street, that has been previously removed from in front of the building on King Street, is reinstated.

The FRA goes on to state that 'Given that the EA flood maps indicate that the risk of flooding is from the road on King Street reinstating the wall here will provide additional protection from flooding. This wall should be at a minimum height of 48.17m AOD to protect the building from the 0.1% level plus 0.6m freeboard for climate change allowance. The gate access in the wall should be fitted with a flood barrier to the same height as the wall.'

The proposed wall inclusive of the flood gate would extend into areas indicated on the Environment Agency's Flood Map for Planning (FMfP) as being in Flood Zones 2 and 3. The FRA includes no assessment of the potential to displace or direct flood risk elsewhere. The FRA should be amended to include consideration of what is effectively a flood wall proposal.

in addition to the issues noted above, there is also no assessment within the submitted FRA of the impact of climate change using appropriate climate change allowances according to <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#peak-river-flow-allowances>

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. The FRA needs to include the appropriate central Ribble Management Catchment peak river flow allowances matched to the lifetime of the development. That allowance would be a 23% uplift for the 2050's epoch or 36% for the 2080's (100yr development lifespan). If using best available proxy allowances, it should be stated why these are suitably precautionary.

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 submitted and we will respond within 21 days of receiving it.

Yours sincerely


Planning Advisor