

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

Our ref: NO/2025/117121/01-L01
Your ref: 3/2025/0870
Date: 13 November 2025

Dear Mr Kilmartin

**PROPOSED DEMOLITION OF FORMER MOTOR SERVICES BUILDING AND
CONSTRUCTION OF NEW OFFICE BUILDING.**

**18 ACCRINGTON ROAD (FORMER WHALLEY MOTOR SERVICES), WHALLEY,
BB7 9TD**

Thank you for consulting us on the above application, received on 3 November 2025.

The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by PSA Design Ltd (referenced: D4737-R-01, dated: October 2025).

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:

- Provide an assessment of the potential increase in flood risk elsewhere as a result of the development being located within both Flood Zones 2 and 3. Any development within the floodplain could impact the existing flooding regime whilst also, increasing the severity and frequency of flooding elsewhere.
 - The proposals include the demolition of an existing building with the construction of a new office building covering a larger footprint. The

proposed office building is shown to be in Flood Zone 2 (FZ2) and partly in Flood Zone 3 (FZ3).

- The FRA should provide a calculation of the amount of floodplain which would be lost as a result of the proposals.

In accordance with the Planning Practice Guidance (PPG) development must not impede the flow of water within Flood Zone 3, nor should it reduce the volume available for storage of flood water.

- Consider the need for flood storage compensation in the floodplain (i.e. Flood Zone 3). The southern extent of the development is located within FZ3. Therefore, the FRA should demonstrate that any built development or modifications/raising of levels to external areas will not increase flood risk elsewhere (e.g. through any built development or ground level changes which may reduce flood storage / displace flood waters / affect flow routes on the floodplain).
 - Paragraph 170 of NPPF states: *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”*. Paragraph 172 c) of NPPF states that this should be done *“using opportunities provided by new development... to reduce the causes and impacts of flooding”*.
 - Where practical, compensatory flood storage works should aim to reduce overall flood risk (whether it be preferably level for level flood storage or otherwise volume for volume flood storage) from developments in Flood Zone 3. This can be most easily achieved by providing more storage than is lost due to the development, although other options may exist in other cases. This principle is also supported by the exception test. The FRA must consider compensatory flood storage for all development/ground level altering in the 1% Annual Exceedance Probability (AEP) defended/undefended flood event (plus appropriate climate change allowance) extent (i.e. future Flood Zone 3).
 - The section ‘Compensation areas for construction in flood zones’ briefly outlines how this will be mitigated but additional narrative should also be added on how the storage volume calculated equates to the design flood (inclusive of climate change allowance), how the compensatory area is intended to function and subsequently drain down in the design flood event. It should also explain how the area would be maintained to fulfil this function for the required lifetime of the development.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. The revised FRA should provide consideration in relation to the impact of fluvial flood risk elsewhere. Where possible, it should reduce flood risk overall. 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.

Informative for the LPA

The Environment Agency has recently been consulted on a draft version of the Ribble Valley Level 1 Strategic Flood Risk Assessment (SFRA), as part of this consultation we have been consulted on the proposed flood zone 3b outlines (functional floodplain). Although this dataset is not currently published and still in draft format, we have checked against the 3b outlines we received during consultation and the southern part of the site is affected. We have not raised a policy objection on the basis that this is only draft information and therefore remains a matter for the LPA.

Yours sincerely

[Redacted]

Sustainable Places Planning Advisor

[Redacted]