

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

Our ref: NO/2025/117121/02-L01
Your ref: 3/2025/0870
Date: 26 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 re-consulting us on the above application on 19 November 2025,
following the submission of additional information.

In our letter dated 13 November 2025 and referenced NO/2025/117121/01-L01, we
objected to this application due to an inadequate Flood Risk Assessment (FRA).

We have now been re-consulted on the letter prepared by PSA Design in response to
our objection.

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA), we maintain our
objection to this application and recommend planning permission is refused.

Reasons

We have reviewed the letter from PSA Design in response to our objection to this
application. The letter provides an explanation regarding the displacement of floodwaters
elsewhere however, we still have concerns about the impact of flood risk elsewhere that
cannot go overlooked and therefore this is a sufficient reason for maintaining our
objection to the planning permission.

The southern extent of the new building lies within Flood Zone 3 which is land defined
by the Planning Practice Guidance as having a high probability of flooding. In our

Environment Agency
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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previous objection, we requested a revised FRA which would provide an assessment of the potential increase of flood risk elsewhere from the development and would therefore not displace fluvial floodwaters or otherwise based on satisfactorily assessing the impact of the development on flood risk elsewhere.

We have not received a revised FRA document, however the letter submitted in response to our previous objection states that '*the extension (within the flood zone area) beyond the existing building footprint is calculated at 100sqm*'. In addition, the applicant has calculated that the proposed building footprint would result in 30 cubic metres of floodwater being displaced. While the applicant has calculated the displacement volume, it fails to provide any solutions or mitigation measures to prevent the displacement of floodwaters elsewhere. The individual effect of not carrying out compensation works for the loss of floodplain storage may appear to be minor, but we are concerned by the cumulative effect of such proposals.

The NPPF states that '*there is no lower volume limit below which compensation is not required*'. In this instance we do not deem it acceptable to remove our objection based on 'inconsequential' volumes, we instead must be mindful of cumulative impacts especially given the history of flooding in Whalley itself. This is a sufficient reason for maintaining our objection to planning permission.

Overcoming our objection

The site could be reconfigured to avoid the development extending further into Flood Zone 3 and therefore potentially displacing floodwaters elsewhere or the applicant should further assess the need for flood storage compensation.

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.

Yours sincerely

Mrs Dana Binns
Sustainable Places Planning Advisor

E-mail clplanning@environment-agency.gov.uk