

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

Our ref: NO/2025/117140/01-L01
Your ref: 3/2025/0873
Date: 28 November 2025

Dear Mr Kilmartin

**CONSTRUCTION OF 6 DETACHED DWELLINGS WITH ASSOCIATED PARKING
AND LANDSCAPING AT LAND OFF SPRINGWOOD DRIVE.**

LAND AT SPRINGWOOD DRIVE, WHALLEY, BB7 9XL

Thank you for consulting us on the above application, received on 12 November 2025.

The planning application is accompanied by a Flood Risk Assessment (FRA) prepared by Reford Consulting Engineers Limited (Ref: 24.1491; Dated: October 2025).

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:

- Adequately consider how a range of flooding events (including extreme events) will inundate the site

The FRA's conclusions are predicated on the assumption that floodwaters will be contained within the Wiswell Brook ordinary watercourse channel up to the 0.1% Annual Exceedance Probability (AEP) event. However, the Environment Agency's hydraulic modelling "shows floodwater overtopping the western bank of the watercourse at the site's southeastern corner and creating the Flood Zone 3 area within the site close to and along the southern boundary of the site before flowing south". The FRA has not satisfactorily demonstrated that the site will not flood during the design flood (1% plus appropriate climate change allowance).

The Whalley 2017 hydraulic model shows that the site will flood because of potential low spots in the right/western bank of the Wiswell Brook ordinary watercourse – this model was informed by a combination of LiDAR and topographical survey.

The applicant should provide information (e.g. from a more detailed/dense survey, showing levels with easting/northing coordinates) which demonstrates adequately that there is no low spot which would otherwise cause flooding from Wiswell Brook. Consideration should especially be given to any riparian vegetation which could conceal low spots. We have provided further data below to help with the additional survey/assessment.

Note: the existing topographical survey in Appendix D is illegible (except for the values that have been superimposed in red/blue) – any superseding survey must be fully legible.

- Increasing flood risk elsewhere and compensatory storage

The FRA has not demonstrated that there will be no increase in fluvial flood risk elsewhere because of the development (e.g. through any built development or ground level changes which may reduce flood storage / displace flood waters / affect flow routes).

The FRA has not considered or proposed flood storage compensation for any development/ground level raising within the fluvial floodplain, accounting for climate change (i.e. the 1% AEP plus appropriate climate change allowance fluvial flood extent). Alternatively, the developer could follow a sequential approach to the site layout and avoid raising ground levels/building in future floodplain.

The development is shown to encroach into the present day floodplain (see Flood Zone 3) and the future floodplain (see Rivers 1in100 Sea 1in200 defended extents CCP1 layer) – the encroachment takes place in the south of the site (which is informed by the Whalley 2017 'local model') and the north-west of the site (which is informed by the New National Model).

We presume ground level raising will take place in the south of the site (i.e. the construction of a development platform where existing ground levels are lower, in addition to any built development) which could displace flood waters and increase flood risk to properties southwards. Built development (or ground level alterations) within the future floodplain towards the north-west of the site could displace flood

waters and create/enhance a flow route to properties north-westwards.

The development may also encroach into Flood Zone 3 on its eastern boundary (i.e. considering ground level alterations). Section 6.10 of the FRA states “existing ground levels along the western bank of the watercourse where it lies along and within the eastern boundary of the site are to be maintained and are not to be reduced”.

However, Section B-B from drawing No.: SWD-CAA-ZZ-ZZ-D-A-1004 (Rev: P2, Date: 01/10/2025) suggests that levels will be reduced along the western/right bank of Wiswell Brook – this could affect flow routes from the watercourse. Furthermore, the ground level lowering for the “new road” shown in this section could create a new flow route running parallel to the watercourse, which could convey water southwards from any low spot on the brook or following any exceedance/blockage event (ie. From a residual flood risk) on the brook.

The above points raised in this section should all be explored/addressed in an updated FRA.

Furthermore, the applicant should provide a pre-development and post-development topographical survey (e.g. using contour lines with 200mm intervals), demonstrating how levels are proposed to change.

Note: the Flood Zone 3 extent on/surrounding the site is currently included as draft Flood Zone 3b for Ribble Valley’s Level 1 Strategic Flood Risk Assessment (albeit using FZ3 as a proxy for FZ3b).

- Raised Finished Floor Levels (FFLs)

Section 7.5 of the FRA states ‘the floor levels of the proposed dwellings are planned to be raised a minimum 300mm above existing ground levels’.

The ‘Preparing a flood risk assessment: standing advice’ PPG states: “Finished floor levels should be a minimum of whichever is higher of 600mm above the:

- average ground level of the site
- adjacent road level to the building
- estimated river or sea flood level

Where there is a high level of certainty about your estimated flood level, it may be appropriate to reduce this to 300mm. If there is a particularly high level of uncertainty it may need to be increased.”

Where dwellings are proposed in future Flood Zone 3 (such as towards the north-west or south of the site), it is not appropriate to set FFLs based on existing ground levels – they should be based on the design flood level plus appropriate climate change allowance (i.e. because the design flood level will be higher than the existing ground levels).

Where dwellings are not proposed in future Flood Zone 3, residual flood risk should also be considered when determining finished floor levels.

FFL proposals should be reconsidered in light of the above.

- Adequately consider how people will be kept safe from the identified flood hazards

The FRA has not demonstrated that the development will be safe for its lifetime. For instance, the FRA has not fully considered access and egress routes that people can use to reach areas of safety in times of flooding.

Section 7.3 states that access/egress/evacuation would take place “north onto Springwood Drive and then to the east.” This initially seems sensible/logical given that the route is Flood Zone 1.

However, the EA is aware and has evidence that Springwood Drive (directly north of the site and along the access/egress/evacuation route) flooded on 31/12/24 / 01/01/2025, following the blockage of a debris screen upstream of the Springwood Drive culvert. We understand that flood flows then travelled north-west before joining Clitheroe Road. This is not currently reflected in Recorded Flood Outline polygon, but we will be updating this as soon as possible. The debris screen has since been removed.

Such flooding events/residual flood risks could have implications on safe/dry access from the site during a range of flooding events. This should be adequately considered in the updated FRA.

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.

Flood risk assessment data (previously known as Product 4) – advice to applicant

In the ‘Product 4’ dataset issued to the applicant (Appendix B in the FRA), the Environment Agency only provided 1d hydraulic modelling information for nodes 6 (931627) and 7 (931620). Information for nodes 931611 (Easting, Northing: 373618,436540) and 931669 (Easting, Northing: 373619,436538), which are located between nodes 6/7, was not provided. The data from these nodes should inform the updated FRA – see Figure 1 and Table 1 below:

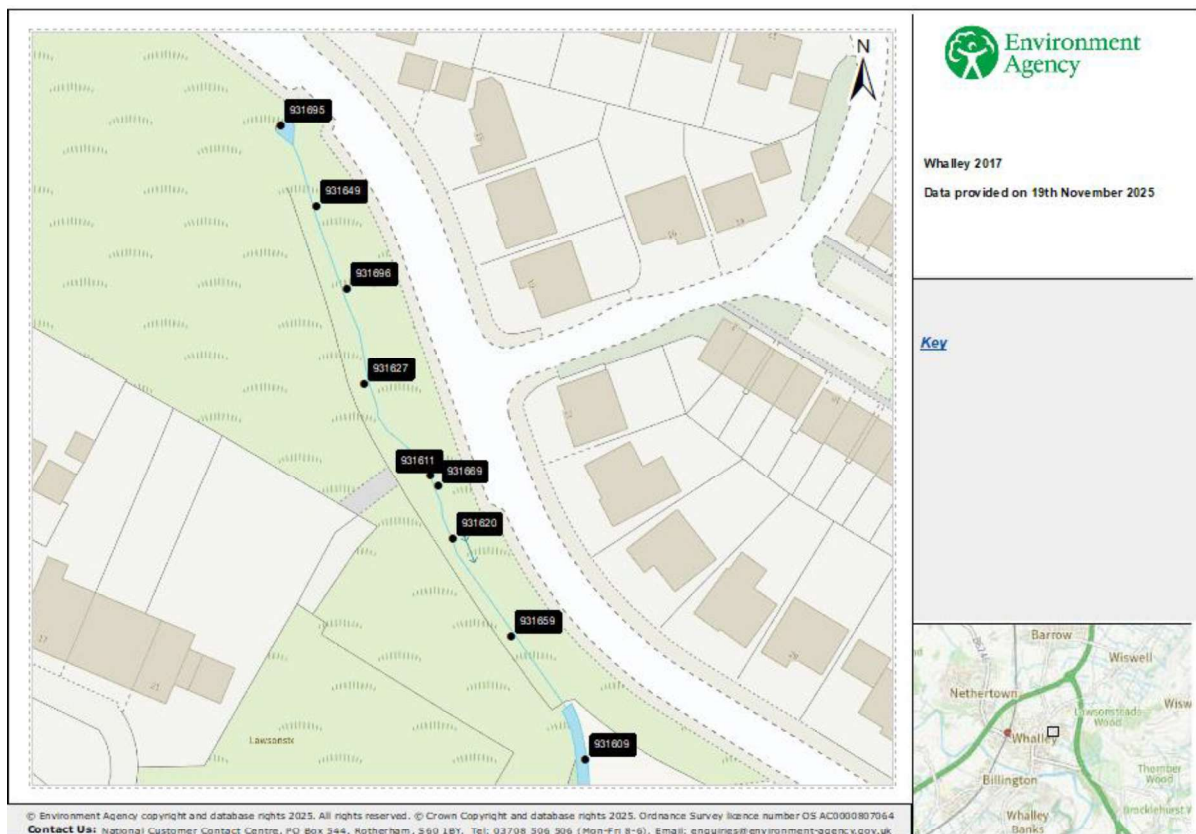


Figure 1: Whalley 2017 modelled information locations

Table 1: 1d hydraulic modelling information at relevant nodes

Flood Location ID	Node Point ID	Model Flood Group ID (D = Defended, UD = Undefended, CC = Climate Change)	Annual Exceedance Probability (AEP %)	Water Level (mAO D)	Flow (m ³ /s ⁻¹)
931627	WISW01_I002	Whalley2017_D	0.1	58.1	2.66
931627	WISW01_I002	Whalley2017_D_15%CC	1	58.05	2.01
931627	WISW01_I002	Whalley2017_D	1	58.03	1.76
931627	WISW01_I002	Whalley2017_U	0.1	58.1	2.66
931627	WISW01_I002	Whalley2017_U_15%CC	1	58.05	2.01
931627	WISW01_I002	Whalley2017_U	1	58.03	1.76
931611	WISW01_01019	Whalley2017_D	0.1	58	1.71
931611	WISW01_01019	Whalley2017_D_15%CC	1	57.95	1.43
931611	WISW01_01019	Whalley2017_D	1	57.92	1.31
931611	WISW01_01019	Whalley2017_U	0.1	58	1.71
931611	WISW01_01019	Whalley2017_U_15%CC	1	57.95	1.43
931611	WISW01_01019	Whalley2017_U	1	57.92	1.31
931669	WISW01d01019	Whalley2017_D	0.1	57.87	1.71
931669	WISW01d01019	Whalley2017_D_15%CC	1	57.81	1.43
931669	WISW01d01019	Whalley2017_D	1	57.77	1.31
931669	WISW01d01019	Whalley2017_U	0.1	57.87	1.71
931669	WISW01d01019	Whalley2017_U_15%CC	1	57.81	1.43
931669	WISW01d01019	Whalley2017_U	1	57.77	1.31
931620	WISW01_01006	Whalley2017_D	0.1	57.78	1.69
931620	WISW01_01006	Whalley2017_D_15%CC	1	57.7	1.43
931620	WISW01_01006	Whalley2017_D	1	57.66	1.31
931620	WISW01_01006	Whalley2017_U	0.1	57.78	1.69
931620	WISW01_01006	Whalley2017_U_15%CC	1	57.7	1.43
931620	WISW01_01006	Whalley2017_U	1	57.66	1.31

Peak river flow climate change allowances – advice to applicant

The appropriate peak river flow allowances for the Ribble Management Catchment have not been applied to the Whalley 2017 hydraulic modelling information to estimate/model future flood levels/extents from Wiswell Brook (downstream of the Springwood Drive culvert). The correct peak river flow allowance of 'Central 2080's uplift of 36%' for more vulnerable development should have been applied for this assessment.

Thus, the potential encroachment/levels associated with future FZ3, towards the south of the site, is not fully considered. It is noted however, that the Rivers 1in100 Sea 1in200 defended extents CCP1 extent broadly aligns with FZ2 at the south of the site – thus, it may be deemed appropriate to use the defended/undefended 0.1% Annual Exceedance Probability (AEP) hydraulic modelling information from the Whalley 2017 model as a proxy for the 1% AEP plus 36% climate change event (but only at the south/east of the site).

Determining flood levels and depths from New National Modelling – advice to applicant

In the absence of flood levels and depths at this site, data should be interpreted to determine indicative flood levels and depths. The approach you take to do this should be presented in your FRA. LiDAR data could be used to determine flood extents by plotting the flood zones on site. An allowance for climate change should be added or you could consider using Flood Zone 2 (or the Rivers 1in100 Sea 1in200 CCP1 extents) as a proxy if appropriate.

Freeboard should be added to the interpreted levels. As per FRA guidance, finished floor levels (FFL's) should be a minimum of whichever is higher of 600mm above the:

- average ground level of the site
- adjacent road level to the building(s)
- estimated river or sea flood level for the site

LiDAR data can be publicly accessed here: [Defra Survey Data Download](#). To download the LiDAR, you will need to draw a polygon around the site of interest. A series of drop down boxes will then appear on the right hand side. You will most likely want to select the Composite DTM. The 2022 box and 1m box should then automatically populate themselves. Then click on the link under the Available tiles to download the data.

You should also consider undertaking your own hydraulic modelling to support your FRA. We hope to be able to supply flood levels and depth data from the New National Model at the end of 2025.

Flood warning and emergency response - advice to LPA

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an

emergency will be limited to delivering flood warnings/alerts to occupants/users covered by our flood warning/flood alert network.

Planning practice guidance (PPG) to the National Planning Policy Framework (NPPF) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 of the NPPF and the guiding principles of the PPG.

Our comments do not mean we consider that the access is safe, or the proposals acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation proposals.

Yours sincerely

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Sustainable Places Planning Advisor

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