

REFORD

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10th June 2026

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

Dear Ms Hughes

Planning reference: 3/2025/0873

Location: Land at Springwood Drive, Whalley, BB7 9XL

Proposal: Construction of six detached dwellings with associated parking and landscaping at land off Springwood Drive

We refer to the latest letter from the Environment Agency dated 26th May 2026 in which the Environment Agency maintained their objection to the planning application as the Environment Agency are not yet satisfied that the development would be safe without exacerbating flood risk elsewhere. The reasons being given are below along with our responses.

Please note that in addition to this letter, as requested by the Environment Agency, the Flood Risk Assessment in support of the planning application has been updated and is submitted with this letter.

1. Increasing flood risk elsewhere and compensatory storage.

At the request of the Environment Agency, in addition to what was already a detailed topographical survey, a more intense grid of levels has since been provided, to the stretch of the western bank of the Wiswell Brook where overtopping is alleged to occur on the Whalley 2017 model, i.e., the south-east of the site.

The information from the survey demonstrates, in unequivocal terms, that there is no low spot within the western bank which would cause flooding from the Wiswell Brook into the development site. As such, any water within the Wiswell Brook stays within the channel and does not overtop the western bank into the development site even when the 0.1% AEP event is considered, (i.e. during the design flood event – the 0.1% AEP event being used as a ‘proxy’ for the 1% AEP plus climate change event), and which has always been the situation.

However, approx. 5m to the south of Node Reference 931620 in the extreme south eastern corner of the development site, the additional topographical survey has identified a low spot within the western bank where there may be a plausible flow path for floodwaters to overtop the western bank of the Wiswell Brook during the 0.1% AEP event.

The detailed topographical survey was provided with our earlier letter and part has been attached to this letter. Importantly, it has been marked up to show that any potential overtopped floodwaters, should they occur at the location approx. 5m to the south of Node Reference 931620, i.e., in the very extreme south eastern corner of the development site, will not ‘fan out’ into the Flood Zone 2 extent at the south of the site where ground level raising is proposed. When correctly interpreting the existing ground levels it can be seen from the marked up survey that the potential for any overtopped floodwaters will flow away from the development site (the limit of the southern site boundary is defined / confirmed by the red line on the topographical survey). The downward gradient of the natural slope of the land away from the proposed development is very evident and therefore any potential flood routing will not be routed back to the south of the development site.

With regards to the 2018 FRA in support of the residential development to the south of the proposed development site, at the time, the planners requested a consultation response from the LLFA, the competent legislative body responsible for commenting on planning applications involving non-main river issues. The LLFA had no comment to make. Moreover, the 2018 flood risk assessment concluded that it is unlikely that the drainage ditch (Wiswell Brook) will overtop the right hand bank and inundate the site with floodwater during the 1 in 1000 year event (0.1%) and that the floodwater would be contained within the drainage ditch channel (Wiswell Brook). Therefore, the drainage ditch (Wiswell Brook) would not overtop its right hand bank to the north east of the site and would not result in floodwater flowing towards the site in question.

Our conclusion within the site specific flood risk assessment in support of the planning application for this development site was the same as for the 2018 FRA and the additional topographical survey carried out at the request of the Environment Agency has also concluded that for the design flood event the water within the Wiswell Brook, where it flows adjacent the development site, stays within the channel and does not overtop the western bank into the proposed development.

As such the Flood Zone 3 area within the development site close to and along the southern boundary of the site should be identified as being Flood Zone 1.

The Wiswell Brook ordinary watercourse lies to the north, east and south of the development site, flowing from the north from Wiswell along Wiswell Shay and Wiswell Lane and then adjacent the eastern boundary of the site. Thereafter, the watercourse flows to the south and then west along Brookside Close before flowing south in a 1200mm diameter culvert under King Street, to eventually discharge into the River Calder approx. 720m to the south of the site.

An extract from the Recorded Flood Outlines on the gov.uk website is shown below. It can be seen that the proposed development site was unaffected.



The recorded flood outlines do not show the flooding originating from the culvert inlet north of Springwood Drive experienced in December 2024 / January 2025 and caused by a blockage of a debris screen, which has subsequently been removed. The Environment Agency stated that that Springwood Drive (directly north of the site and along the access / egress / evacuation route) flooded and that flood flows then travelled north-west before joining Clitheroe Road. As such the subject site was unaffected.

The flood map for planning shows a Flood Zone 3 area within the western part of the site that is overland flow from water allegedly overspilling from the section of Wiswell Brook which runs alongside Wiswell Lane and then overland down the hill supposedly through the development site and beyond, to rejoin the Wiswell Brook where it lies along Brookside Close. This area, defined as Flood Zone 3 was originally as a consequence of surface water flooding,

as depicted on the surface water flood maps prior to March 2025. The route of this overland flow will not be impeded by the proposed development, ground levels within this area of the site being maintained and any boundary fences to be erected being raised a minimum 225mm above the ground.

From the above, it has been demonstrated:

- That for the design flood event the water within the Wiswell Brook stays within the channel where it flows adjacent to the development site and does not overtop the western bank into the development site. As such the southern part of the development site should be identified as being Flood Zone 1.
- The Flood Zone 3 area within the western part of the site is likely to be overland flow from water overspilling from the section of Wiswell Brook which runs alongside Wiswell Lane and then overland down the hill, potentially through the development site and beyond, to rejoin the Wiswell Brook where it lies along Brookside Close.

As such, there will be no interference of flow, water will not accumulate within the site and will not be displaced. The site specific FRA has demonstrated no increase in fluvial flood risk elsewhere as a result of the development both now and for the 1% plus climate change event. Flood storage compensation will, therefore, not be required to be provided.

2. Increasing risk elsewhere during residual events.

It has been demonstrated that the 0.1% AEP event remains within the Wiswell Brook channel where it flows through the development site and not overspill into the development site. The retaining structure plays no part in preventing flood waters from entering the site but is for bank stability as it is proposed to reduce the levels within the development site. The acceptance of the structure being termed a 'flood defence structure' is purely based on the fact that the structure will support the bank of Wiswell Brook. There will be no influence / impact on flood flow, velocity or flood risk from the Wiswell Brook and no increase in flood risk elsewhere.

For the above reasons, it is accepted that the retaining wall could be classed as a flood defence structure and therefore, should planning permission be granted, an appropriate condition should be added to the decision notice to provide drawings of the retaining wall and appropriate engineering details for approval.

3. Raised finished floor levels.

It has been stated that the proposed dwellings within Plots 3 and 6 have been set a minimum 600mm above the average existing ground levels adjacent to each dwelling. There will be no sunken floor levels within the development site, the floor levels being set above the highest finished ground levels immediately adjacent to the dwellings, thus providing a freeboard on

the uphill elevations immediately adjacent to the dwellings. As such, proposed (raised) floor levels of the dwellings should be more than sufficient to deal with any residual flooding should it remotely occur, in particular as any overspill from the Wiswell Brook will be overland flow rather than impounded accumulation.

It is not proposed to lift the proposed finished floor levels of Plots 1, 2, 4 and 5 as they are located within the Flood Zone 1 area of the site identified on the Flood Map for Planning, although the floor levels being set above the highest finished ground levels immediately adjacent to the dwellings will provide a degree of freeboard on the uphill elevations immediately adjacent to the dwellings.

It should be noted that floor levels also have to be set to comply with access requirements to the dwellings on a sloping site – ref AD ‘M’ of the Building Regulations.

With reference to the above we therefore request that the Environment Agency removes their objection to the proposal.

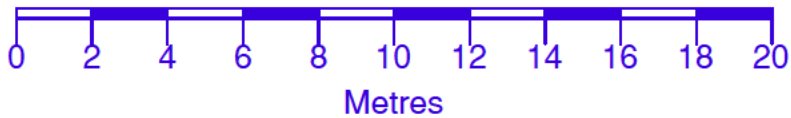
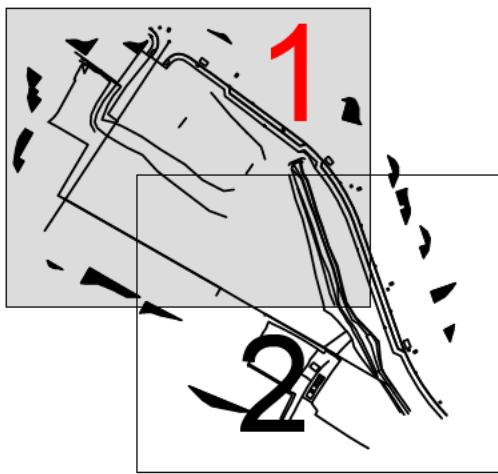
Yours sincerely,

Bob Ford

Bob Ford
DIRECTOR
REFORD Consulting Engineers Limited

Notes

All Dimensions to be checked on site. Walls shown on plans are not to be assumed to be solid & should be checked for thickness, construction, load bearing capacity & stability.



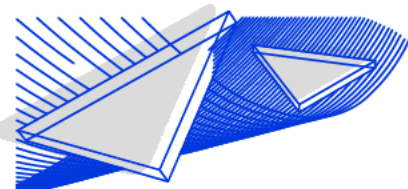
ABBREVIATIONS

- BT BT Cover
CL Cover Level
DK Drop Kerb
EH Eaves Height
GU Gully
LP Lamp Post
MH Man Hole
RH Ridge/Roof Height
TF Top of Fence
TH Top of Hedge
TW Top of Wall

NOTE

All levels and coordinates relate to OSGB36(15) using GNSS data.
Levels defining edge of carriageway are observed at channel (bottom of kerb).

Rev.A Description. Additional Survey Data



2 Berkshire Close | Wilpshire | Blackburn | Lancashire | BB1 9NG
tel 01254 614055 fax 01254 209754 e-mail sales@tricadsolutions.co.uk

Site Address

Springwood Drive
Whalley
BB7 9XL

Project Description
Site Survey

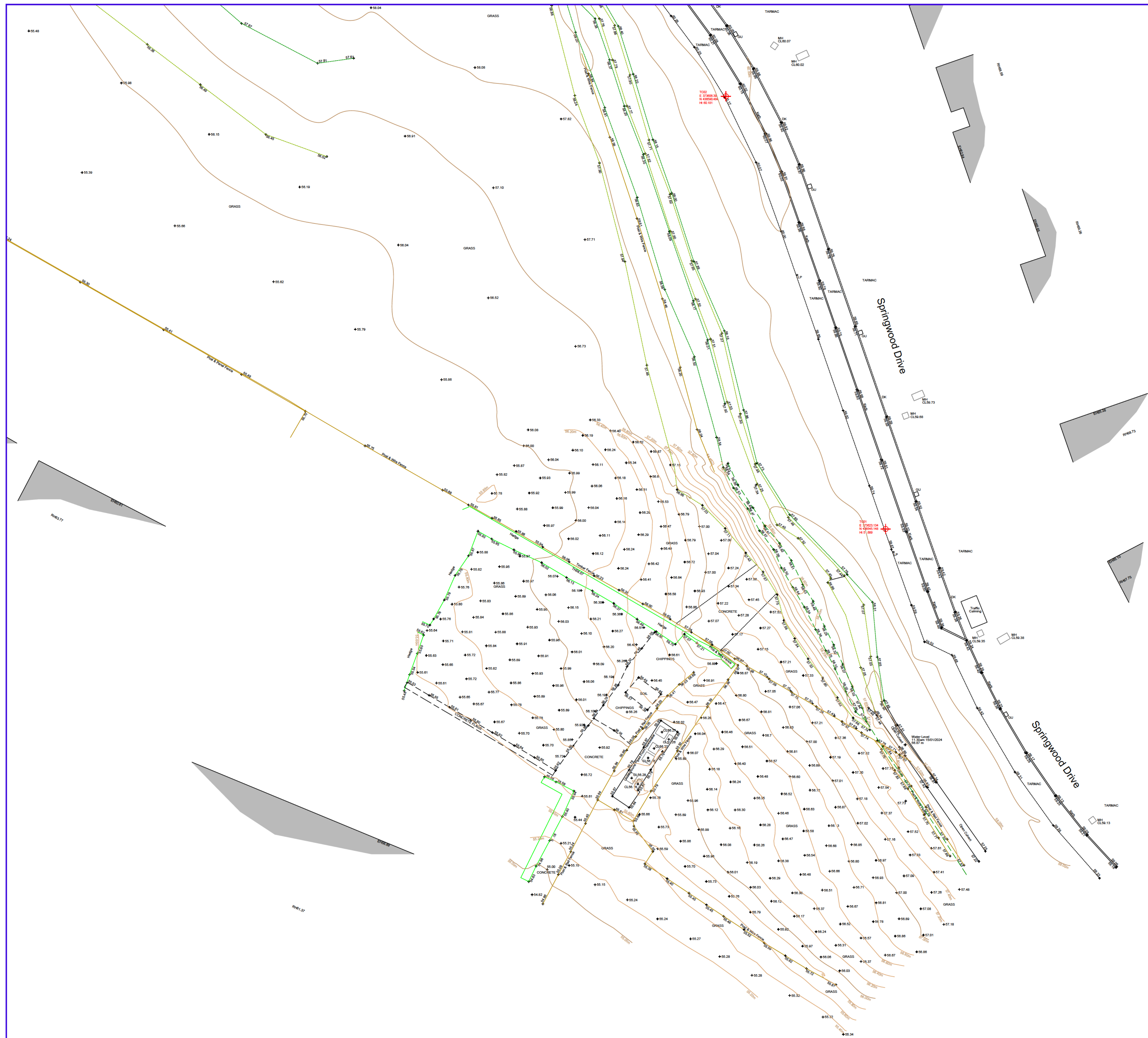
Drawing Title

Existing
Site Layout

Scale Date Drawn By
1:200@A1 15/01/2024 MW

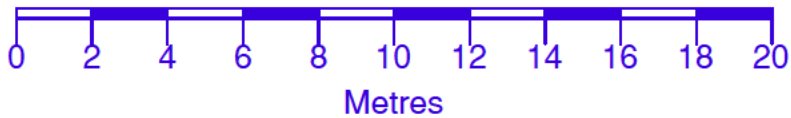
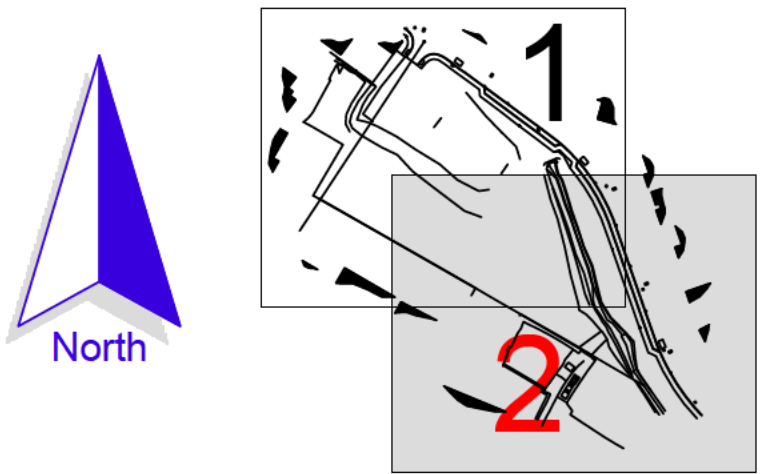
Drawing Number

TRI-4353-01



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BB7 9XL

Project Description

Site Survey

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1:200@A1	15/01/2024	MW

Drawing Number

TRI-4353-02

