

REFORD

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5th May 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 letter from the Environment Agency dated 6th March 2026 in which the Environment Agency maintained their objection to the planning application, the reasons being given are below with our responses alongside.

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

The FRA has not satisfactorily demonstrated that the site will not flood during the design flood (0.1% event used as a proxy for the 1% plus climate change event). The applicant must provide a sufficiently detailed / dense / concentrated / continuous survey which demonstrates adequately that there is no low spot which would cause flooding from Wiswell Brook. Consideration should especially be given to any riparian vegetation which could conceal low spots. We do not yet believe the applicant has demonstrated beyond reasonable doubt that there is no low spot in the right / western bank of Wiswell Brook, which would cause inundation to the site during a design flood.

Attention must especially be given to the stretch of bank where overtopping is shown to occur on the Whalley 2017 model, at the south-east of the site. The design flood level for Nodes References 931669 and 931620 is higher than the next respective downstream bank levels.

Furthermore, the applicant has not considered bank levels outside (i.e. south-east) of the red line boundary near 1d Node 931695 – the modelled 2d grid from our Whalley 2017 model shows a potential flowpath near this node, which could inundate the site in the 0.1% AEP event (which is being used as a 'proxy' for the 1% plus climate change design flood).

Response: We have produced a site specific flood risk assessment using a detailed topographical survey of the site. LiDAR information has not been used. As requested, we have carried out sufficiently detailed / dense / concentrated / continuous additional survey work to the stretch of the western bank of the Wiswell Brook where overtopping is shown to occur on the Whalley 2017 model at the south-east of the site.

In order for an accurate survey to be carried out the vegetation was cut back along the bank of the Wiswell Brook prior to the survey. The information from the survey demonstrates that there is no low spot within the western bank which would cause flooding from the Wiswell Brook into the development site. As such the water within the Wiswell Brook stays within the channel and does not overtop the western bank into the development site for the 0.1% AEP event, which has always been the situation.

As such the Flood Zone 3 area within the site close to and along the southern boundary of the site before flowing south should be identified as lying within Flood Zone 1. A copy of the additional survey is included with this letter.

It is noted that the same conclusion was reached, as for this application, within the flood risk assessment produced in 2018 in support of the residential development that has been constructed on land immediately to the south of this application site. The modelled information within the Wiswell Brook provided by the Environment Agency for the 2018 application has been compared with the modelled information provided by the Environment Agency for this application and the modelled information is the same.

The letter from the Environment Agency mentions that bank levels outside (i.e. south-east) of the red line boundary near 1d Node Reference 931695 have not been considered as the modelled 2d grid from the Environment Agency's Whalley 2017 model shows a potential flowpath near this node, which could inundate the site in the 0.1% AEP event. Please note that Node Reference 931695 is within the north eastern part of the site where the Wiswell Brook emerges from culvert into open ditch.

However, we have considered Node Reference 931620 in the extreme south eastern corner of the development site. Here the modelled level provided for the 0.1% event is 57.78m AOD

and the adjacent bank level is 57.99m AOD demonstrating that the water stays within the Wiswell Brook.

Approx. 5m to the south of Node Reference 931620, the additional topographical survey has identified a low spot within the western bank where water from the Wiswell Brook may overtop the western bank in the 0.1% AEP event. However should this happen, the water will flow away from the development site, down the natural slope of the land, as indicated by the additional survey work that has been carried out for that area.

Please note that a fence has been erected at the extreme south eastern end of the southern boundary of the site to separate the development site from the neighbouring land. Flooding from the Wiswell Brook is not expected to occur at this location. However the fence has been raised off the ground by a minimum of 225mm so that if residual flooding were to occur it would be able to flow unimpeded and not affect the development site. Photographs of the erected fence are included with this letter.

2. Increasing flood risk elsewhere and compensatory storage

The FRA has not adequately demonstrated no increase in fluvial flood risk elsewhere as a result 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 adequately demonstrated whether flood storage compensation is required for any development / ground level raising within the future floodplain, accounting for climate change (i.e. the 0.1% AEP extent used as a 'proxy' for the 1% AEP plus climate change extent).

With regards to potential future floodplain encroachment north-west of the site (which is informed by the New National Model) – the FRA states “The route of this overland flow will not be obstructed by the proposed development, ground levels within this area of the site remaining existing”. The applicant should provide a site plan (with appropriate topographic information) overlayed with Flood Zones (namely Flood Zone 2 which is being used as a 'design flood proxy' as demonstration.

As stated above, it has been demonstrated above that the 0.1% AEP flood level will remain within the Wiswell Brook channel and not overspill into the development site. As such the southern part of the development site should be identified as lying within Flood Zone 1. In addition, the flood risk assessment in support of the planning application states that the flood risk within the western part of the site is overland flow from water overspilling from the section of Wiswell Brook which runs alongside Wiswell Lane and then overland to rejoin the Wiswell Brook where it lies along Brookside Close. 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. Also, being overland flow, the water will not accumulate within the site and will not be displaced and therefore flood storage compensation will not be required.

With regards to potential future floodplain encroachment north-west of the site, the site plan, with appropriate topographic information, has been overlayed with the Flood Zone 2 boundary. The site plan demonstrates that the route of the overland flow will not be impeded by the proposed development.

As it has been demonstrated that the 0.1% AEP flood level will remain within the Wiswell Brook channel and not overspill into the development site, the construction of a 300mm upstand within the site, parallel to the western bank of the Wiswell Brook, will not increase flood risk elsewhere.

As requested, further sectional drawings have been produced and are provided with this letter.

3. Raised Finished Floor Levels (FFLs)

As it has been demonstrated above, based upon the modelled flood levels provided by the Environment Agency and the additional topographical survey of the site, there is a high level of certainty that the 0.1% AEP flood level will remain within the Wiswell Brook channel and not overspill into the development site. As such the proposed floor levels of the proposed dwellings within Plots 3 and 6 have been set a minimum 600mm above the average existing ground levels adjacent to each dwelling and this should be sufficient to deal with any residual flooding should it occur, in particular as any overspill from the Wiswell Brook will be overland flow.

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

The flood risk assessment in support of the planning application stated that a safe route was available onto Springwood Drive and then to the east. It is noted that Springwood Drive at its eastern end, is currently being connected to the A671 and the whole of this route lies within Flood Zone 1.

If it is not possible to evacuate safely from the dwellings, or If during evacuation flood waters are confronted, then refuge shall be taken within the first floor of the dwellings where occupants will be safe above predicted flood water levels and may remain until rescued or flooding has subsided or Environment Agency Flood Warnings are no longer active.

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



