

MM 186

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

Our ref: NO/2017/109917/OT-
03/SB1-L01
Your ref: pmods22HEDDPD
Date: 15 August 2018

Dear Sir/Madam

**HOUSING AND ECONOMIC DEVELOPMENT – DEVELOPMENT PLAN DOCUMENT
CONSULTATION ON PROPOSED MAIN MODIFICATIONS – ADDITIONAL HOUSING
SITES**

Thank you for consulting us on the above.

We have reviewed the proposed additional housing sites in so far as they relate to our remit.

Environment Agency position

We object to the proposed allocation of sites MM1 (Site 15) and MM3 (Site 13) as insufficient information has been submitted to demonstrate their compliance with paragraph 157 of the National Planning Policy Framework (NPPF) July 2018.

Reason

Sites MM1 and MM3 both include areas that are considered to be at risk of flooding based on the Environment Agency flood Map for Planning:-

- Site MM1 – approximately a quarter of the proposed allocation lies within Flood Zone 2 (medium probability of flooding) and Flood Zone 3 (high probability of flooding)
- Site MM3 – small parts of the proposed allocation lie within Flood Zone 2 (medium probability of flooding) and Flood Zone 3 (high probability of flooding) along the northern and southern site boundaries

There is no evidence submitted to demonstrate that the proposed allocations satisfy the requirements of the Sequential Test and, where necessary, the Exception Test. In the absence of this information, there is nothing to indicate that the suitability of those parts of the site that are at risk of flooding are suitable for residential development.

Environment Agency
PO Box 519, South Preston, Lancashire, PR5 8GD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

Overcoming our objection

To address the above concerns, the following options are available:-

- a) If residential development is proposed in an area of flood risk on these sites, sufficient information to demonstrate compliance with the requirements of the Sequential Test and, where necessary, the Exception Test, will be required. To satisfy the Exception Test, sufficient information should be obtained to identify any mitigation measures necessary to make the development safe for its lifetime.

We will only consider the evidence submitted to satisfy the Exception Test. It will be for the Inspector to determine whether or not the sites satisfy the Sequential Test.

- b) If residential development is not proposed in those parts of the site considered to be at risk of flooding, then the site boundary needs to be revised to exclude them. Alternatively, those parts of the site that are not suitable for residential development need to be clearly delineated within the site allocation and excluded from the area available for residential development.

As the allocation of the site will effectively give the "in principle" approval for residential development, in the absence of evidence to support development in the floodplain it will be essential that areas of the site at risk of flooding are clearly excluded from the allocation. Development on these parts of the site will be unacceptable unless it can be demonstrated that it would be safe without increasing flood risk elsewhere.

In relation to option a), we can provide you with any relevant information that we may have to help you satisfy the Exception Test, where required.

If you wish to discuss our comments further, please do not hesitate to contact me.

Yours faithfully



End