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

NO/2017/109917/OT-04/EW1-L01

Your ref:

sub22HEDDPD

Date:

11 March 2019

Dear Sir/Madam

HOUSING AND ECONOMIC DEVELOPMENT - DEVELOPMENT PLAN DOCUMENT CONSULTATION ON MAIN AMENDMENTS - ADDITIONAL HOUSING SITES

Thank you for referring the above to the Environment Agency for consultation.

## **Environment Agency position**

We have reviewed the amendments to the additional housing sites, and based on the proposed revisions to the boundaries of Site MM1 and Site MM3 to remove any areas of Flood Zone 3 and Flood Zone 2 from the site allocations, we withdraw our objection to the proposed Main Modifications and we wish to make the following comments:-

The revisions to the boundaries of Site MM1 and Site MM3 ensure that residential allocations are wholly within Flood Zone 1 (low probability of flooding) and include a 10m buffer to the extent of Flood Zone 2. The Sequential and Exception Tests as detailed in paragraph 158 and 159 of the National Planning Policy Framework no longer apply and a Level 2 Strategic Flood Risk Assessment (SFRA) is not required. Locating the residential allocations wholly within Flood Zone 1 ensures development will be at the lowest possible risk and allow Flood Zone 2 to provide a buffer should the extent of Flood Zone 3 increase as a result of climate change.

While developers who subsequently bring these allocations forward may seek to extend the site boundary, any future proposals for development in unallocated areas in either Flood Zone 2 or 3 will still need to comply with relevant flood risk policies in the NPPF and Policy DME6 in the adopted Ribble Valley Core Strategy. A detailed site-specific Flood Risk Assessment (FRA) will be required to support proposals in Flood Zones 2 and 3 to determine the extent of flood risk and identify what mitigation may be required to make the development safe.

Yours faithfully

Planning Advisor - Sustainable Places Team

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

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