

Adele Waddington
Clerk
Trawden Forest Parish Council
Unit 2A Black Carr Mill
Skipton Road
Trawden
Colne
Lancashire
BB8 8QU

Our ref: NO/2012/104469/OR-
06/PO1-L02
Your ref:
Date: 4 July 2018

Dear Madam

Re: Flood Risk Assessments for sites 012 and 015, Trawden Forest Neighbourhood Plan

We have reviewed the Neighbourhood Plan FRAs, for Site Allocations 012 and 015, referenced 2018-058-02 and 2018-058-01, produced by Flood Risk Consultancy Limited, dated 20/06/2018.

The site allocations lie within Flood Zone 2 and 3, defined as having a medium / high probability of flooding in the national Planning Practice Guidance.

In accordance with the Sequential Test outlined in National Planning Policy Framework (NPPF) paragraph 101, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine whether or not the proposals satisfy the Sequential Test as defined in paragraph 101 and, where necessary, the requirements of the Exception Test as set out in paragraph 102.c

Environment Agency position

We have reviewed the FRAs in line with the second part of the Exception Test and paragraph 103 of the NPPF.

The FRAs have been produced in line with the guidance and provide sufficient information to enable a preliminary understanding of the extent to which people and property will be exposed to flood hazards (on and off site) once the development and any flood mitigation is in place. The FRAs conclude that these sites are at high risk of fluvial flooding, and identify the relevant development constraints and recommend flood mitigation measures.

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

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We are therefore satisfied that the FRAs provides enough information to inform the allocation of these sites in the Neighbourhood Plan.

However, we do have significant concerns regarding the development of this site for more vulnerable use. In particular, the FRA identifies the depth and velocity of flooding during a design flood, rated as 'Significant Hazard- danger to most' with predicted flooding to a depth of 0.75m. Safe development would be dependent on rigorous management of the flood risk. We would therefore request that these site allocations are supported by a specific policy in the Neighbourhood Plan that clearly identifies the risks and necessary mitigation measures, as outlined in these FRAs.

In addition, any subsequent planning application should be accompanied by a more detailed FRA that comprehensively details how flood risk would be managed. The FRA should:

- Characterise the nature of flooding, considering how the rate of onset and duration of any flood event will affect the evacuation plan
- Include detailed building designs to demonstrate how the development will avoid displacement of flood water;
- Provide a complete understanding of how the development layout will affect flood flow routes through the site, including depth and velocity of flooding during a design flood plus climate change;
- Identify comprehensive flood resilience measures;
- Include a robust emergency evacuation plan to be reviewed and agreed by the LPA and emergency services, considering evacuation or the use of internal safe refuge.

Without this additional information we would not be able to assess the flood risk associated with any specific proposal, and would object to the development.

Further information

There some small but important errors in the FRAs that we would like to bring to your attention.

1. Firstly in page iii of the executive summary reference is made to 'Consent' required from the Environment Agency due to the Main River status of Trawden Brook. Please note as of April 2016 Environmental Permitting for Flood Risk Activities replaced the previous Flood Defence Consenting regime and the legislation and subordinated legislation that supported it Information on Flood risk activities: environmental permits can be found here. <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>
Please note that on proposed Main River development sites such as this the Environment Agency requires permanent retention of a continuous unobstructed area for future maintenance [and / or improvement works]. This can include access requirements suitable for plant and equipment.
2. Section 6.3.5 on Page 18 of the FRA states- "During the 100 year 70% climate change event within Trawden Brook the flood level associated with the watercourse is 175.256 AOD, the average ground level on site is 174.500m AOD.
During this event it is anticipated that the majority of the site will flood to a depth of 1.756m." This should read 0.756m and not 1.756m.

Yours faithfully

Mrs Liz Locke
Sustainable Places Officer

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