

Mr John Dalton
Pendle Borough Council
Planning Policy
Town Hall Market Street
Nelson
Lancashire
BB9 7LG

Our ref: NO/2012/104469/CS-
05/SB1-L02

Your ref:

Date: 2 December 2024

Dear Mr Dalton

**Pendle Local Plan 4th Edition (2021-2040)
Publication Draft**

Thank you for consulting us on this local plan document.

Environment Agency Position

We have reviewed the publication version of the draft plan and we are satisfied that in so far as it relates to our remit, the issues and concerns of relevance to our remit have been included in the plan and addressed through suitably worded policies.

The plan also seeks to allocate various sites for employment and residential use. Several of these sites are affected by fluvial flood risk issues, three of which already have planning approval. Where planning approval has been granted for sites with areas at risk of fluvial flooding, the applications were accompanied by site-specific Flood Risk Assessments (FRAs). We reviewed these FRAs and we were satisfied that in principle, the sites could be developed safely without increasing flood risk elsewhere (subject to mitigation).

Despite the above, three other sites (P052, P257, P013) are at risk of fluvial flooding and do not have planning approval. As a result, the publication version of the plan is accompanied by several Level 2 Strategic Flood Risk Assessments for these sites, which represent additional evidence that was not provided during the previous consultation on the local plan.

We have considered the Level 2 SFRA's for P052, P257, P013 in so far as they relate to our remit and we are satisfied that provided any development proceeds in accordance with the recommendations of those reports, we have no in principle concerns that the site would not be safe or would increase risk elsewhere. Notwithstanding this, we would like to make these specific comments in relation to some of the L2 SFRA content: -

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

Cont/d..

- The climate change allowances used in the L2SFRA are out of date and any future site-specific FRA needs to apply climate change allowance. We would refer you to the following guidance [Flood risk assessments: climate change allowances](#)
- The documents refer to culverts under the ownership of the Environment Agency but it is unlikely that we own them as usually they are the responsibility of the riparian landowner. Anyone who seeks to develop these sites should be aware of this.

If you have any questions about our comments, please do not hesitate to contact me.

Yours sincerely

Miss Isabel Garbutt

Planning Advisor

e-mail clplanning@environment-agency.gov.uk