Dear Sir/Madam

ACCRINGTON AREA ACTION PLAN - EXAMINATION

I refer to the above and our previous response dated 27 September 2010 which raised issues of soundness of the Accrington AAP in relation to flood risk and main river constraints.

Following the start of the examination process we have worked closely with Hyndburn Borough Council to provide guidance on resolving the issues raised. In relation to this further work we wish to make the following comments:

**Flood Risk**

- Flood Risk Issues Report, September 2011

The above report applies the Sequential and Exception test to the proposed allocated sites as specified by Planning Policy Statement 25: Development and Flood Risk (PPS25). The investigation demonstrated that site 32 has significant flood risk issues that could effect the deliverability of the site, it also demonstrated the level of risk posed by flooding on the other sites. This improved understanding of flood risk has allowed Hyndburn to make reasonable recommendations regarding the development of all of their allocations

**Main River Culverts**

In terms of the culverted main rivers which flow through the AAP boundary the maps provided by the Council demonstrate that apart from site 32 the constraint of the culvert and the subsequent 8 metre easement could be accommodated within future layouts of these sites.

**Removal of Site 32**

Environment Agency
PO Box 519, Bamber Bridge, Preston, PR5 8GD.
Customer services line: 03708 506 506
www.environment-agency.gov.uk
Cont/d..
As a result of the above investigations, site 32 has been recommended for removal as a residential allocation it is now proposed as open space. We support this recommendation.

**Proposed Changes to AAP**

- Schedule of Proposed Changes in relation to flood risk matters, August 2011

We have reviewed the schedule of proposed changes for the AAP which along with the flood risk report we feel that the AAP and it’s site allocations are now justified and deliverable.

We support the inclusion of flood risk policy (ATC24) flood risk policy within the AAP as it outlines the sites which will require a flood risk assessment to ensure these developments will not be at an unacceptable risk of flooding.

We support the amended policies within Part C for specific sites which now include reference to flood risk, main river culverts and the inclusion for recommendations of deculverting for certain sites.

Taking the above into consideration, providing that the proposed changes outlined within the schedule are implemented we would consider the Area Action Plan to now be sound.

Yours faithfully

**Gemma Jackson**  
**Planning Liaison Officer**

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