

TODMORDEN TOWN COUNCIL

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Mr N Swales & Ms L Buckley
C/O National Customer Contact Centre
Environment Agency
PO Box 544
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DATE: 25th JANUARY 2021

Dear Mr Swales and Ms Buckley

Concerns About Planning Application 20/01367/FUL Derdale St, Todmorden

I am writing on behalf of the members of the Development Committee of Todmorden Town Council. They have asked me to let you know that they are very concerned about the potential for additional flooding in Todmorden caused by further building proposed for Derdale St - planning application 20/01367/FUL.

I attach a copy of my letter to the Calderdale Planning Department about the wider planning issues.

Members are particularly concerned about the flood zone categorisation for Derdale St and surrounding areas which is currently zone 3(a).

This categorisation was likely to have been applied before the major floods in 2015 and subsequent years which devastated local properties and assumes that flooding would be 1 in a 100-year occurrence.

As there have been several floods since then it would seem that, based on the evidence, the likelihood of flooding is now 1 in 10-years or worse. Would this indicate that the categorisation for this area should be changed to zone 3(b) so that no further building can take place in the pockets of land between the river and canal in this area?

Walking down the canal from Derdale St to Hebden Bridge I notice that after the Weir Minerals site is a substantial area of flood plain. With the impact of climate change and the increase in flooding in the Derdale St area it would seem reasonable that this area also be classified as functional flood plain.

On a wider note, given increased frequency of flooding events in Todmorden and no doubt across the country, we wonder whether the Environment Agency is undertaking any formal review of its current classification of flood zoning in general and especially with a view to increasing the flood mitigation requirements and burden of proof for developers to satisfy such requirements for all zones.

Our concerns focus on the fact that we are in an era of increasing frequency of flooding events and that the usual 1 in 100 year frequency is no longer the norm and which current flooding classifications appear to be based upon.

Whilst we appreciate at the sharp end, physical works are being carried out across the country and are most welcome, nevertheless we are concerned that the incremental effect of new development in flood zone areas can only add to the burden placed on at times, old and inadequate infrastructure. Add to this, areas that suffer from extensive water run-off, and any development in such areas has an incremental impact.

We appreciate there is a very difficult balance to be achieved but would be interested to know whether there are any intentions to review the current classification of areas in terms of flood zone categorisation, or the strengthening of such classifications, and whether greater importance will be given to the cumulative effect of increasing development in areas of known flooding risk that would enable more frequent reviews of such areas to be carried out.

Whilst understanding that there are competing demands in terms of the need for more housing and indeed proposed changes to the planning system to encourage new development, but unchecked growth in areas that are prone to flooding, where developers can relatively easily satisfy existing flood zone requirements, place Planning Authorities with little remedy to refuse permission for fear of planning appeal and associated costs.

Having a framework/guidance in place that enables Planning Authorities to cite more frequent flooding incidences as evidence to support localised changes in restricting development would require legislative change.

We see the Environment Agency as the only statutory body that could seriously influence such change and would welcome your views and advice on this.

Yours sincerely

C R Hill

Colin Hill

Town Clerk, Todmorden Town Council

Letter sent by email