

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

**Our ref:** NO/2021/113750/06-L01  
**Your ref:** 3/2021/0731  
**Date:** 05 October 2023

Dear Sir/Madam

**REDEVELOPMENT OF THE EXISTING EDUCATIONAL FACILITY INCLUDING PART DEMOLITION OF THE EXISTING INFANT SCHOOL TO PROVIDE A STANDALONE NURSERY FACILITY, TOGETHER WITH THE ERECTION OF A NEW INFANT BLOCK TO THE REAR OF THE NEW NURSERY BUILDING, ALONGSIDE ADDITIONAL CAR PARKING. SOFT AND HARD LANDSCAPING TREATMENT AND VEHICULAR AND PEDESTRIAN ACCESS WORKS OFF GREENACRE STREET. ST. JAMES' C OF E PRIMARY SCHOOL, GREENACRE STREET, CLITHEROE, BB7 1ED**

Thank you for consulting us on the above application which we received 22 September 2023.

### **Environment Agency position**

The planning application site is subject to a lengthy planning history and an existing Environment Agency objection on Flood Risk grounds relating to an incomplete modelling review process.

The current proposal has taken a sequential approach and placed the new buildings in the areas of the site at lowest risk of flooding, with the proposed new school building being situated on the right bank of the river and on the western aspect of the existing school site, adjacent to the existing playground.

The application is accompanied by a Flood Risk Assessment (FRA) prepared by JBA Consulting referenced; KPZ-JBAU-00-00-RP-Z-0002-St\_James\_Clitheroe\_-\_FRA, Revision S3-P02 and dated 1st September 2023. We have reviewed the FRA in so far as it relates to our remit, and we are satisfied that the development would be safe without exacerbating flood risk elsewhere if the proposed flood risk mitigation measures are implemented. The proposed development must proceed in strict accordance with this FRA and the mitigation measures identified as it will form part of any subsequent planning approval. Any proposed changes to the approved FRA and / or the mitigation measures identified will require the submission of a revised FRA.

### **Compensatory Storage**

Section 7.3 of the FRA referenced above, describes the Compensatory Storage requirements. The proposed development is partly within the 1% AEP plus 36% climate

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change allowance flood boundary. Therefore, an equivalent compensatory storage provision must be provided to store an equal volume to the volume of water displaced. The FRA confirms that the volume of water within the proposed development footprint has been calculated in GIS and is equivalent to 49.05 m<sup>3</sup>, this has been calculated by assuming a uniform depth of 150mm across the entire flood area.

An area for proposed compensatory storage area comprising of 120m<sup>2</sup> is suggested in the FRA and indicated in the proposed site plan STJ-CAA-ZZ-DR-A-1002 Rev P1. However, this detail is not yet designed and therefore we have no objection to the proposal subject to the inclusion of the following planning condition:

### **Condition**

The development hereby permitted must not be commenced until such time as a scheme to provide appropriate compensatory storage on site has been submitted to, and approved in writing by, the local planning authority.

- The scheme and plans submitted shall show the final engineering solution for the compensatory storage, providing detailed design to demonstrate how the scheme will function to ensure flood waters can enter the storage and be discharged freely after a flood. It must be demonstrated that there will be no loss in storage capacity for the lifetime of the development.
- The scheme shall be fully implemented prior to any development on site and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

### **Reasons**

- To ensure that there are no detrimental impacts to flood storage or flood flow routes.
- To reduce the risk of flooding to the proposed development, future users and elsewhere.

### **Compensatory Storage – advice to applicant**

The compensatory storage should be designed using the following guidance: - CIRIA 624 (Development and flood risk – guidance for the construction industry - Section A.3.3.10, 2004) states that:

“Compensatory flood storage must become effective at the same point in a flood event as the lost storage would have done (McPherson 2002). It should therefore provide the same volume and be at the same level relative to flood level, as the lost storage”.

Yours faithfully

**Carole Reynolds**  
**Planning Advisor**

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