

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

Our ref: NO/2024/116298/01-L01
Your ref: 3/2024/0544
Date: 12 September 2024

Dear Sir/Madam

**PROPOSED PROVISION OF GRP SUBSTATION TO HOUSE ENWL
INFRASTRUCTURE, PLANT ROOM BUILDING AND ASSOCIATED ALTERATIONS
TO SITE LAYOUT INCLUDING REPOSITED BIN STORE, CYCLE STORE AND
BOUNDARY TREATMENT ALTERATIONS.
THE OLD GARAGE SITE NEWTON ROAD, DUNSOP BRIDGE, BB7 3BB.**

Thank you for consulting us on the above application which we received 28 August 2024.

We previously responded to a similar application on this site, under planning application reference 3/2022/0082, our ref. NO/2022/114247/01, dated 24/02/22. The latest plans show the inclusion of an electricity sub-station.

We have reviewed the following documents:

'The Old Garage Site - Flood Risk Assessment' - Version 3.0 - RAB: 2833L by RAB consultants Limited– dated 12/01/2022.

The Old Garage Site, Dunsop Bridge, Phase 1 Desk Study. Rev O. Dated November 2021

Contaminated land

We note the following paragraph in the desk study report and concur with the proposals. *'It is recommended that groundwater monitoring boreholes be constructed at the site to permit sampling and testing of the groundwater. The testing regime should also include the testing of soil samples taken during the construction of the boreholes to assess hazards to future site users and to water supply pipes. Whilst the main focus of the investigations will be centred on the former tank farm and garage buildings, the investigations should also assess the area to the rear of the garage where there may be fuel and oil residues from parked or dismantled vehicles, and asbestos fibres that have been dispersed from building materials. The scope and extent of the site investigations should be approved by the regulators before works begin.'*

The previous use of the proposed development site as a Petrol Station presents a high risk of contamination that could be mobilised during construction to pollute controlled

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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waters. Controlled waters are particularly sensitive in this location because the proposed development site is

- located upon a secondary A aquifer.
- Within 25 meters of a river

The application demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken.

Environment Agency position

We have no objection to the development proposed subject to the inclusion of the following planning condition requiring the submission of a remediation strategy. This should be carried out by a competent person in line with paragraph 189 of the National Planning Policy Framework.

Without this condition we would object to the proposal in line with paragraph 180 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution. Our detailed comments can be found below.

Condition

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reasons

- To ensure that the development does not contribute to and is not put at

unacceptable risk from or adversely affected by unacceptable levels of water pollution in line with paragraph 180 of the National Planning Policy Framework.

- To prevent deterioration of a water quality element to a lower status class in the underlying aquifer. and/or adjacent River.

Flood Risk – Advice to applicant

The planning application is accompanied by a comprehensive Flood Risk Assessment (FRA), referenced above. We have reviewed the FRA, in so far as it relates to our remit, and we have no objection to the development as proposed. However, the applicant, as owner of the existing property, will be aware of the potential flood risk and frequency. The applicant should be satisfied that the impact of any flooding will not adversely affect their proposals.

Flood warning and emergency response - advice to LPA

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The planning practice guidance to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the Planning Practice Guidance (PPG).

Advice to LPA/applicant

This development has been proposed within an area identified as being at risk of flooding and includes the provision of car parking. The applicant should be aware that vehicles can start to float in flood depths of less than 60cm – less if it is fast-flowing. The applicant must satisfy themselves that any buildings will be constructed in such a way that vehicles floating or displaced as a result of flooding, would not jeopardise its structural stability.

In addition, the applicant should ensure that any sensitive infrastructure such as gas and water pipes or electrical cabling are located and designed to withstand the potential impacts of floating or displaced vehicles.

Signing up for flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings> . It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities. For practical advice on preparing for a flood, visit

<https://www.gov.uk/prepare-for-flooding>. To get help during a flood, visit <https://www.gov.uk/help-during-flood>. For advice on what do after a flood, visit <https://www.gov.uk/after-flood>.

Yours faithfully

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