

In response to the EA's request for further consideration to compensatory storage requirements we would comment as follows.

The extension (within the flood zone area) beyond the existing building footprint is calculated at 100sqm. In isolation, and with reference to NPPF guidance this would be deemed "minor development" small commercial extensions (under 250sqm). As such, compensatory storage would NOT be a material consideration. Whilst we acknowledge this application does not constitute minor development, it is important to take cognisance of the fact that if the application was revised to simply extend the existing commercial building to the rear, it would fall well within the above remit.

Our flood risk assessment acknowledged that the EA's model does not provide up to date data in terms of "design flood event + climate change allowance" and used the 0.1% AEP as a proxy design level. The FRA concluded that the building would be safe during such event. It would however be remiss to calculate the offsite impacts based on this level. The model data contained within the FRA indicated the 1% +15%cc) AEP flood level was 46.30m AOD. Actual climate change level should be +36%. Ground levels to the rear of the building are generally flat, measuring 46.0mAOD. Thus, using the +15%cc level, this would indicate a displaced flood volume of 30cum. When compared to the wider fluvial event footprint, such a small volume would be insignificant. Due to the constraints and topography of the brownfield site, it is not possible to provide compensatory storage.

Notwithstanding the above, with reference to planning application 3/2022/1158 (immediately east of the site), this application's FRA provided additional modelling in the area, taking the Whalley 2017 data used in our FRA and updating specifically to the proximity of our application site. The FRA and its conclusions were subsequently accepted by the EA. The FRA calculated the 1%AEP + 36%cc design event level, along Woodland View (immediately south of our application site) at 46.02mAOD. With reference to our topographical survey, and as set out above, levels within the area of the proposed "extension" are at or above this level. This would therefore suggest that there would be negligible impacts following the construction of the proposed building. On the contrary, there would be significant flood risk benefits in rebuilding the existing dilapidated commercial building, providing a safe working environment complimented with modern SuDS and flood resilient features.

I trust this helps clarify matters.

Kind Regards

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