

**Contact:** Please contact the Local Planning Authority

**Date:** 18 July 2022

Dear Local Planning Authority,

Thank you for inviting the Lead Local Flood Authority to comment on the below application.

### PLANNING APPLICATION CONSULTATION RESPONSE

<b>Application Number:</b>	3/2022/0657
<b>Proposal:</b>	Discharge of conditions 9 (surface water sustainable drainage scheme), 13 (artificial bird nesting and bat roosting boxes) and 17 (Boundary treatment) for application 3/2019/1104
<b>Location:</b>	Land at Hawthorne Farm, Hawthorne Place, Clitheroe, BB5 2HU

The Lead Local Flood Authority is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015. It is in this capacity this response is compiled.

Comments provided in this representation, including conditions, are advisory and it is the decision of the Local Planning Authority whether any such recommendations are acted upon. The comments given have been composed based on the extent of the knowledge of the Lead Local Flood Authority and information provided with the application at the time of this response.

#### **Lead Local Flood Authority Position**

The Lead Local Flood Authority is currently **unable to recommend the discharge of condition 9** on planning decision 3/2019/1104 on the basis of:

- The applicant has failed to apply a climate change allowance of 40% as clearly stated in the wording of the condition. The submitted drainage calculations show a climate change allowance of 30% applied.
- The applicant has failed to demonstrate how an urban creep allowance has been applied within the site, an allowance for urban creep is required within the

wording of the condition. It is unclear from the submitted evidence if the applicant has applied the urban creep allowance to the drainage calculations, the applicant will be required to clearly demonstrate how this has been applied to the drainage calculations or else demonstrate an alternative method of how the urban creep allowance has been incorporated within the design. The CIRIA SuDS Manual can provide guidance on approved methodologies for urban creep allowances.

- It is unclear from the drainage layout, the connection point that surface water will be discharged at 11.7l/s.
- The drainage layout fails to provide cover levels for the manholes in order to ensure that in the event of exceedance from manhole chambers the surrounding areas are not at risk of flooding due to their finished floor levels.
- The exceedance routes should take into consideration the flow paths of exceedance for the entire site, in order to ensure that they can be directed away from vulnerable areas from the development.

### **Lead Local Flood Authority - Site-Specific Advice**

The following advice is provided to inform the applicant and the Local Planning Authority of our expectations:

The Lead Local Flood Authority wishes to make it clear for future applications that regardless of any previous applications attempting to discharge conditions under different application reference numbers, all documents should be submitted which are essential to discharging a particular condition.

### **What this response DOES NOT cover**

This response does not cover highway drainage, matters pertaining to highway adoption (s38 Highways Act 1980) and/or off-site highway works (s278 Highways Act 1980). Should the applicant intend to install any sustainable drainage systems under or within close proximity to a public road network (existing or proposed), then they would need to separately discuss the use and suitability of those systems with the relevant highway authority.

The applicant is encouraged to discuss the suitability of any overland flow routes and/or flood water exceedance with the relevant highway authority should they have the potential to impact the public highway network and/or public highway drainage infrastructure (either existing or proposed).

### **Material Changes or Additional Information to this Planning Application**

If there are any material changes to the submitted information or additional information provided after this Lead Local Flood Authority response to the Local Planning Authority which impact surface water, the Local Planning Authority is advised to re-consult the Lead Local Flood Authority. Please be aware this will be classed as a re-consultation with a full 21-day response time. Re-consultations should be sent to our identified mailbox.

Please send a copy of the decision notice to our identified mailbox.

Yours faithfully,

**Harry McGaghey**

Lead Local Flood Authority