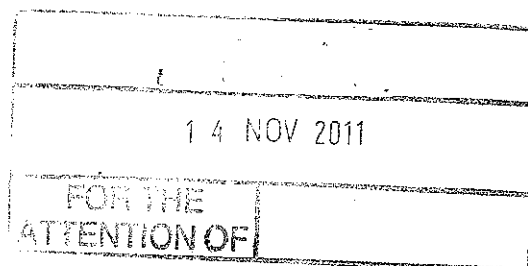


Ribble Valley Borough Council
Development Control
Council Offices Church Walk
Clitheroe
Lancashire
BB7 2RA

Our ref: CE/2011/105169/01-L01
Your ref: 3/2011/0837P
Date: 14 November 2011



Dear Sir/Madam

**PROPOSED RESIDENTIAL DEVELOPMENT
CALDERSTONES, WHALLEY**

Thank you for referring the above application which was received on 25 October 2011.

We have no objection in principle to the proposed development subject to the inclusion of conditions which meet the following requirements:-

Flood Risk

We have reviewed the Flood Risk Assessment (FRA) by RSK for Taylor Wimpey Manchester and the Calderstones Phase 3 proposal (October 2011; ref 880162-R02(04)). To ensure the development does not exacerbate flood risk downstream, surface water run-off from the development should be restricted to existing rates. Detailed drainage proposals have not been submitted and therefore we recommend that any subsequent approval is conditioned as follows:

CONDITION No development approved by this permission shall be commenced until a scheme for the disposal of foul and surface waters has been approved in writing by the Local Planning Authority. Such a scheme shall be constructed and completed in accordance with the approved plans.

REASON To ensure a satisfactory means of drainage.

CONDITION No development approved by this permission shall be commenced until a scheme for the provision and implementation, of a surface water regulation system has been approved by the Local Planning Authority. The scheme shall be completed in accordance with the approved plans.

REASON To reduce the increased risk of flooding

Approved Document Part H of the Building Regulations 2000 establishes a hierarchy for surface water disposal, which encourages a Sustainable Drainage Systems (SUDS) approach. Under Approved Document Part H the first option for surface water disposal should be the use of SUDS, which encourage infiltration such as soakaways or infiltration trenches. In all cases, it must be established that these options are feasible, can be adopted and properly maintained and would not lead to any other environmental problems. For example, using soakaways or other infiltration methods on contaminated land carries groundwater pollution risks and may not work in areas with a high water table. Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

The FRA has determined that ground conditions are not appropriate for infiltration and that the nearest watercourse is over 500m away. We would still encourage the use of appropriate SUDS systems, such as permeable pavements, in the design of the detailed drainage arrangements. Flow balancing SUDS methods which involve the retention and controlled release of surface water from a site may be an option for some developments. Flow balancing should seek to achieve water quality and amenity benefits as well as managing flood risk.

Further information on SUDS can be found in:

- PPS25 page 33 Annex F
- PPS25 Practice Guide
- CIRIA C522 document Sustainable Drainage Systems-design manual for England and Wales
- CIRIA C697 document SUDS manual
- The Interim Code of Practice for Sustainable Drainage Systems

The Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SUDS. The Interim Code of Practice is available on both the Environment Agency's website www.environment-agency.gov.uk and CIRIA's website www.ciria.org.uk

Any works to the watercourses within or adjacent to the site which involve infilling, diversion, culverting or which may otherwise restrict flow, require the prior formal Consent of the Environment Agency under Section 23 of the Land Drainage Act 1991. Culverting other than for access purposes is unlikely to receive Consent, without full mitigation for loss of flood storage and habitats.

We recommend that the developer considers the following, as part of the scheme:-

- Water management in the development, including, dealing with grey waters
- Use of sustainable forms of construction including recycling of materials
- Energy efficient buildings

Land Quality

We have reviewed the following reports submitted in support of this application:

- Preliminary Phase 2 Geoenvironmental Assessment – Calderstones Park, Whalley (Ref: 25608E/R1), Clarke Bond North Geoenvironmental, February 2011
- Geoenvironmental Site Investigation Report – Calderstones Park, Whalley (Ref:

It seems there is a discrepancy between the two reports in the consideration of the historic landfills to the north west of the site as an off-site source. We do not have any detailed records of the landfills, but both reports indicate they received commercial and household wastes. Only the June 2010 includes this off-site source in its conceptual model and, as a result, groundwater samples were taken to see if there was any leachate migration. The report states there were exceedance of some contaminants, but the results had been omitted from the report we have received.

As the site for which the planning application relates to is closer in proximity to the landfills, we would expect it to feature more in the conceptual model. Although it is considered good practice anyway to take samples if groundwater is encountered during a site investigation, this certainly should be the case when a potential migrating source has been identified. The report alludes to the fact that groundwater samples may have been taken, but they are not present in the laboratory analysis.

The historic landfills will need to be included in the conceptual model, and appropriate groundwater analyses submitted before points (1) & (2) of the condition below are satisfied.

We consider that planning permission should only be granted to the proposed development as submitted if the following planning condition is imposed as set out below. Without this condition, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the application.

CONDITION No development approved by this planning permission shall be commenced until:

- a) A desktop study has been undertaken to identify all previous site uses, potential contaminants that might reasonably be expected given those uses and other relevant information. Using this information a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors has been produced.
- b) A site investigation has been designed for the site using the information obtained from (a) above. This should be submitted to, and approved in writing by the local planning authority prior to that investigation being carried out on the site.
- c) The site investigation and associated risk assessment have been undertaken in accordance with details approved in writing by the local planning authority.
- d) A Method Statement and remediation strategy, based on the information obtained from c) above has been submitted to and approved in writing by the Local Planning Authority.

The development shall then proceed in strict accordance with the measures approved. Work shall be carried and completed in accordance with the approved method statement and remediation strategy referred to in (d) above, and to a timescale agreed in writing by the local planning authority: unless otherwise agreed in writing by the local planning authority.

If during development, contamination not previously identified, is found to be present at the site then no further development (unless otherwise agreed in writing

with the local planning authority) shall be carried out until the developer has submitted, and obtained written approval from the local planning authority for, an addendum to the Method Statement. This addendum to the Method Statement must detail how this unsuspected contamination shall be dealt with.

Upon completion of the remediation detailed in the Method Statement a report shall be submitted to the local planning authority that provides verification that the required works regarding contamination have been carried out in accordance with the approved Method Statement(s). Post remediation sampling and monitoring results shall be included in the report to demonstrate that the required remediation has been fully met. Future monitoring proposals and reporting shall also be detailed in the report.

REASON

a) To identify all previous site uses, potential contaminants that might reasonably be expected given those uses and the source of contamination, pathways and receptors.

b) To enable:

- A risk assessment to be undertaken,
- Refinement of the conceptual model, and
- The development of a Method Statement and Remediation Strategy

c) & d) To ensure that the proposed site investigation and remediation strategy will not cause pollution of ground and surface waters both on and off site.

The historic landfills will need to be included in the conceptual model, and appropriate groundwater analyses submitted before points (1) & (2) of the condition above are satisfied.

Foul Drainage

The Utilities Statement for Calderstones Park Phase 3 by RSK for Taylor Wimpey Manchester (September 2011; ref 880162 R01(04)) demonstrates that United Utilities have been consulted on the application and that they are satisfied with the proposed discharge to the foul sewer from this phase of the Calderstones development.

A copy of this letter has been sent to the applicant/agent.

Yours faithfully

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cc Turley Associates

End