

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

**Date:** 07 February 2022

Dear Local Planning Authority,

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

#### PLANNING APPLICATION CONSULTATION RESPONSE

<b>Application Number:</b>	3/2021/1262
<b>Proposal:</b>	Full application for the erection of 4no. commercial units (Use Class E).
<b>Location:</b>	Land at the North of the Chapel Hill site Longridge

Under the Flood and Water Management Act 2010 the LLFA is the responsible 'risk management authority' for managing 'local' flood risk which refers to flood risk from surface water, groundwater or from ordinary watercourses. The LLFA 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 (LPA) whether any such recommendations are acted upon. The comments given have been composed based on the current extent of the knowledge of the LLFA and information provided with the application at the time of this response.

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

The Lead Local Flood Authority **objects** to the development proposal on the basis of: No Drainage Strategy

#### **Objection**

##### **Objection 1 – No Drainage Strategy**

In the absence of a drainage strategy to assess the principle of surface water sustainable drainage associated with the proposed development, we object to this application and recommend refusal of planning permission until further information has been submitted to the local planning authority.

## **Reason**

Paragraph 169 of the NPPF requires major developments to incorporate sustainable drainage systems that:

- take account of advice from the lead local flood authority;
- have appropriate proposed minimum operational standards;
- have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- where possible, provide multifunctional benefits.

The submission of basic information on how surface water is intended to be managed is vital if the local planning authority is to make informed planning decisions. In the absence of acceptable information regarding surface water sustainable drainage, the LLFA cannot assess whether the development proposed meets the requirements of Paragraph 169 of the NPPF or the PPG in principle. This is sufficient reason in itself for a refusal of planning permission.

## **Overcoming our Objection**

You can overcome our objection by submitting information that demonstrates how surface water will be managed on-site, satisfying the principles of Paragraph 169 of the NPPF and the PPG.

If this cannot be achieved we will consider whether there is a need to maintain our objection to the application. Production of this information will not in itself result in the removal of an objection.

The Lead Local Flood Authority asks to be re-consulted with the results of the amended flood risk assessment and/or amended drainage strategy. We will provide you with further comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an amended flood risk assessment and/or amended drainage strategy has been submitted. Production of a revised FRA and/or drainage strategy will not in itself result in the removal of an objection.

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

The LLFA makes note to the applicant that the North West SuDS Pro-forma directs developers that when not using an existing drainage system in its entirety for brownfield sites, it is expected that surface water drainage calculations are derived using the greenfield rates for the site.

## **Material Changes to this Planning Application**

If there are any material changes to the submitted information which impact on surface water, the local planning authority is advised to consider re-consulting the LLFA. Please send a copy of the decision notice to our mailbox.

## **If you decide to approve contrary to our response**

If the Local Planning Authority grants planning permission for this development contrary to the LLFA's objection, we will be unable to provide comment on the discharge of any surface water or flood risk conditions which we have not recommended.

Yours faithfully,

**Harry McGaghey**  
Lead Local Flood Authority