

	<p style="text-align: center;"><b>Longridge Town Council</b></p> <p style="text-align: center;">Council Offices, The Station Building Berry Lane, Longridge, PR3 3JP</p> <p style="text-align: center;">Telephone: <b>01772 782461</b> email: <a href="mailto:longridgetc@gmail.com">longridgetc@gmail.com</a> website: <a href="http://www.longridgetowncouncil.com">www.longridgetowncouncil.com</a></p>	
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**Mission Statement**

Endeavour, through foresight and leadership, to enhance quality of life for Longridge residents and visitors. Working to enrich facilities and nurture opportunity,  
to protect and improve the built and natural environment, and promote community pride.

Ribble Valley Borough Council  
Council Offices  
Church Walk  
Clitheroe  
BB7 2RA

Dear Sir

**Re: Planning application 3/2016/0193 Land East of Chipping Lane Longridge - Longridge Town Council Comments**

Longridge Town Council was extremely concerned that outline planning permission number 3/2014/0764 was granted at **Land East of Chipping Lane Longridge** decision date 29 October 2015. Aside from the obvious issues of the impact on the landscape, the pressures on services and highways, the Council believes that the report upon which the decision was based was flawed in another very important aspect.

The drainage on site at present is inadequate and further development will exacerbate the problem. The Council is so concerned that the issue has not been properly addressed that it commissioned its' own independent report, a copy of which is attached/enclosed. The main conclusions in the report are:

The findings of the review are set out below – for clarity, only those issues worthy of consideration/comment have been highlighted with paragraph numbers referring to those in the RSK report which was submitted with the planning application 3/2014/0764 and can be found on the RVBCs website.

**Flooding From the Land** (Para 5.4) – The report does not consider the effects of surface water flooding downstream. There are high risk / flood plain areas that will be exacerbated by additional peak flow and volume downstream of the site.

☐ **Flooding from Sewers** (Para 5.6) – The Existing sewer from Redwood Drive is shown to be diverted into an unnamed watercourse from current outfall in to Higgin Brook. What are the implications of this? Can levels accommodate this? Has the receiving ditch got capacity? The sewer is 375mm diameter, which could potentially carry very large flows. The “other” surface water sewer is also a 375mm dia sewer which is likely to carry heavily surcharged unrestricted flows. Ditches in this area may already be at capacity however no assessment has been made of this.

**The Fisher German Report** mentions on numerous occasions about existing surface water problems and poor infiltration on site.

The scheme will involve a number of culverts over the existing watercourses, one of which appears to be Higgins Brook. Lancashire County Council Consenting and Enforcement Policy notes that the Lead Local Flood Authority will generally refuse consent applications which seek to culvert an existing ordinary watercourse. This is in line with Environment Agency guidance on protecting watercourses which is reproduced at **Annex 1**.

### **Drainage Strategy**

Post Development Situation (Para 6.5) - states that surface water will either infiltrate or more likely will leave the site via the watercourses. The findings in the Fisher German report, suggests that soakaways are very unlikely to be a viable solution. This could impact on the performance of porous paving. Porous paving doesn't necessarily perform on poorly draining ground. In reality, the clay layers are likely to act as a barrier and channel water towards the lowest lying areas (the watercourses)

- We assume that a drainage assessment would have been undertaken to inform the strategy however we have not had access to this.
- According to the drawings the existing greenfield run-off rate is set at 158.8l/s. Based on the calculated QBAR rate of 7.3l/s/ha, this would suggest a developable area (excluding public open space, landscaping, cricket pitch etc) of 21.7ha. This seems a little high but details of this calculation are not provided. More realistically, we would estimate a developable area of around 16ha, which would result in a corresponding allowable discharge rate of 117 l/s.
- No consideration appears to be taken of dealing with interception storage (i.e the first 5mm of rainfall to hit the ground). Around 50% of rainfall events are less than 5mm and cause no measurable runoff from greenfield areas into receiving watercourses. In contrast, runoff from a development takes place for virtually every rainfall event. This difference means that watercourses receive frequent discharges with polluted washoff from urban surfaces (hydrocarbons, suspended solids, metals etc). Replication of the greenfield runoff from small events will result in many fewer polluted discharges so limiting the potentially damaging impact on the receiving environment. If this can't be dealt with at source then it means that greater volumes of run-off will be hitting the watercourse overall and putting additional strain on what appears to be an already over capacity system downstream
- We can't comment on the volumes and attenuation calculated as these were not available. However, looking at the drawing there appears to be 3 outfalls. The restrictions from each outfall are 49.3 l/s, 63.3 l/s and 46.2 l/s. This totals 158.8 as per the RSK rate. Notwithstanding that we think this rate is overestimated, this doesn't allow or account for any greenfield run-off from the proposed development. What the assessment has done is calculated greenfield run-off from the entire site but then showed a positively drained system, collecting water purely from impermeable areas and discharged this at that rate. In accordance with the drawing notes, RSK have

estimated 40% will be impermeable, therefore suggesting that 60% will be greenfield (21.7 x 0.6 = 13ha). This 13ha will still have an associated greenfield run-off. Based on the RSK calculations, 13 x 7.3l/s/ha = 95 l/s. This therefore potentially equates to a total run-off from the proposed development of 158.8 + 95 = 253.8 l/s. Compare this to our suggested greenfield run-off rate of circa 117l/s then it can clearly be seen to be a significant difference.

- The proposed outlets from the HydroBrake flow control manholes are shown at their deepest 3.5m deep. It is doubtful that the receiving ditches will be deep enough to accept the free discharge without the need for pumping.

Longridge Town Council seeks assurances from the developer, the Lead Flood Authority and Ribblesdale Valley Borough Council that this fundamental matter will, at this late stage, be properly addressed.

Accordingly this letter has been copied to all three organisations.

The Town Council would be obliged if you could kindly acknowledge receipt of this letter and if you would forward the attached flood report with your consultations in regards to flooding.

Kind regards

Lesley Lund

Town Clerk