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Date: 15 December 2016

# APPLICATION CONSULTATION RESPONSE

Application Number:	3/2016/0344
Location:	Land at Accrington Road Whalley Lancashire
Proposal:	Application for approval of reserved matters of layout, scale, appearance and landscaping and the additional reserved matters required by Conditions 2 and 8 following outline planning permission 3/2012/0179 for a residential development for the elderly, comprising of 37 bungalows and 40 retirement apartments.

Thank you for inviting the Lead Local Flood Authority (LLFA) to comment on the above application. The Flood and Water Management Act (FWMA) 2010 introduces a range of new powers, duties and responsibilities and makes Lancashire County Council a Lead Local Flood Authority (LLFA). The Flood and Water Management Act 2010 sets out the requirement for LLFAs to manage 'local' flood risk within their area. 'Local' flood risk refers to flooding or flood risk from surface water, groundwater or from ordinary watercourses.

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. It is ultimately the responsibility of the Local Planning Authority to approve, or otherwise, any drainage strategy for the associated development proposal. The comments given have been composed based on the current extent of the knowledge of the LLFA and information provided at the time of this response.

### Lead Local Flood Authority Position:

The Lead Local Flood Authority has **no objection** to this reserved matters application; subject to the requirements of Conditions 15, 16, 17, 22, 24 and 25 of Outline planning permission 3/2012/0179 being satisfied in full. The Local Planning Authority is advised to consider attaching an appropriate condition or informative to the decision notice in order to secure this.

Ribble Valley Borough Council and the applicant are reminded that the proposals for access, appearance, landscaping, layout and scale can directly impact the nature of

any proposed surface water drainage system for the site. This should be taken in to consideration when finalising the details of any surface water regulation system for this site.

#### Comments and advice:

### Flood vulnerability

It is evident that the proposed development will result in a change in Flood Risk Vulnerability Classification from Less Vulnerable to More Vulnerable under Paragraph: 66 of the Planning Practice Guidance.

### Sustainable Drainage Systems:

<u>Paragraph 103 of the National Planning Policy Framework (NPPF)</u> and <u>Written</u> <u>Statement on Sustainable Drainage Systems (HCWS161)</u> requires that surface water arising from a developed site should, as far as it is practicable, be managed in a sustainable manner to mimic surface water flows arising from the site prior to the proposed development, whilst reducing flood risk to the site itself and elsewhere, taking climate change into account.

The Lead Local Flood Authority encourages that site surface water drainage is designed in line with the <u>Non-Statutory Technical Standards for Sustainable</u> <u>Drainage Systems</u> and <u>Planning Practice Guidance</u>, including restricting developed discharge of surface water to greenfield runoff rates making suitable allowances for climate change and urban creep, managing surface water as close to the surface as possible and prioritising infiltration as a means of surface water disposal where possible.

Regardless of the site's status as greenfield or brownfield land, the Lead Local Flood Authority encourages that surface water discharge from the developed site should be as close to the greenfield runoff rate as is reasonably practicable in accordance with Standard 2 and Standard 3 of the <u>Non-Statutory Technical Standards for Sustainable Drainage Systems</u>.

Sustainable drainage systems offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge absorbing diffuse pollutants and improving water quality. Ponds, reedbeds and seasonally flooded grasslands can be particularly attractive features within public open space.

The wide variety of available sustainable drainage techniques means that virtually any development should be able to include a scheme based around these principles and provide multiple benefits, reducing costs and maintenance needs.

The applicant is reminded that Paragraph 103 of the NPPF requires priority use to be given to SuDS and in accordance with Paragraph 80, Section 10 of the Planning Practice Guidance the preferred means of surface water drainage for any new

development is via infiltration. The applicant must submit evidence as to why each 'level' of this hierarchy cannot be achieved.

Prior to designing site surface water drainage for the site, a full ground investigation should be undertaken to fully explore the option of ground infiltration to manage the surface water in preference to discharging to a surface water body, sewer system or other means. For example, should the applicant intend to use a soakaway, they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

The Lead Local Flood Authority also strongly encourages that the developer should take into account designing drainage systems for exceedance working with the natural topography for the site. Should exceedance routes be used, the applicant must provide a site layout plan with these displayed, in line with Standard 9 of DEFRA's Technical Standards for SuDS.

Flow balancing SuDS methods which involve the retention and controlled release of surface water from a site may be an option for some developments at a scale where uncontrolled surface water flows would otherwise exceed the local greenfield run off rate. 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;

- CIRIA C687 Planning for SuDS Making it Happen
- CIRIA C697 The SuDS manual
- CIRIA C635 Designing for exceedance in urban drainage: good practice
- CIRIA C698 Site handbook for the construction of SUDS
- HR Wallingford SR 666 Use of SuDS in high density developments
- National Planning Policy Framework and Planning Practice Guidance

The multifunctional potential of sustainable drainage systems (SuDS) should be exploited to maximise their cost effectiveness, regardless of the size of development site. Early design consideration is advised to build SuDS into multi-functional spaces and build up a network of SuDS that manage runoff close to its source to avoid the need for large storage areas.

Designing green space and public realm with SuDS that work well when both wet and dry can provide valuable community recreational space as well as important blue and green infrastructure. Sports pitches, squares, courtyards, playgrounds, landscapes around buildings, urban parks, green corridors and woodlands are all popular types of open space which can be integrated with SuDS. SuDS can also contribute to development targets for open space where they are designed to be multi-functional.

On smaller development sites, space efficient SuDS can still be incorporated and include, for example, green roofs, bio retention gardens, permeable paving, rills, rainwater harvesting, hardscape storage, micro-wetlands, and bio retention tree pits.

## Permeable Paving Advice:

Any permeable paving used on hard standings **must not** be included as part of the hydrological calculations. The reason for this is that occupants may change hard standings to non-permeable materials in future which has the potential to increase surface water runoff which was previously unallocated for in the design of the sustainable drainage system. Where permeable paving is included in the hydrological calculations of a development proposal, the local planning authority is advised to consider the removal of permitted development rights for permeable paving.

Should the local planning authority not remove the permitted development rights for permeable paving on privately owned land, then the LLFA may consider the need to designate such areas under Schedule 1 of the Flood and Water Management Act 2010. The District Council, as a flood risk management authority in its own right, also has these powers to designate.

It should be noted that any permeable paving on the highway must be agreed with the Highway Authority (LCC Highways Developer Support Team) if the applicant intends to have the highway adopted following construction. Please contact the Highway Authority on: <u>developeras@lancashire.gov.uk</u>

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: <a href="mailto:suds@lancashire.gov.uk">suds@lancashire.gov.uk</a>

Yours faithfully,

**Chris Dunderdale** Lead Local Flood Authority Lancashire County Council

