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Date: 9 June 2017

APPLICATION CONSULTATION RESPONSE

Application Number:	3/12017/0183
Location:	Land adjacent Church Raike, Chipping, PR3 2QL
Grid Ref:	362148/443371
Proposal:	Reserved matters application for the appearance, landscape, layout and scale of a residential development comprising 41 dwellings.

Thank you for inviting the Lead Local Flood Authority (LLFA) to comment on the above application. 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 with the application at the time of this response.

Lead Local Flood Authority (LLFA) Position

The Lead Local Flood Authority **objects** to the development proposal on the following basis:

Objection 1:

Inadequate information to assess application - In the absence of adequate information to assess the principle of surface water 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:

The proposed scale of development may present risks of flooding on-site and/or off-site if surface water run-off is not effectively managed. The lack of any information at all in relation to surface water drainage means the LLFA cannot assess whether the development proposal meets the requirements of Paragraph 103 of the National Planning Policy Framework or Paragraph 80 of Section 10 of the Planning Practice Guidance in principle.

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 any information at all regarding surface water management, the flood risks resulting from the proposed development are unknown and this is therefore sufficient reason in itself for a refusal of planning permission. The table below highlights the additional information which would be required in order for the LLFA to be able to provide a substantive response:

<p>Desktop study to incorporate maps showing:</p> <ul style="list-style-type: none">• Geological and soil types
<p>Site Drainage Layout, including:</p> <ul style="list-style-type: none">• Sustainable drainage system• Sewers• Drains• Watercourses• Outfall locations• Discharge rates• On-site storage requirements
<p>Site investigation report, including the results of each sustainable drainage system feature of:</p> <ul style="list-style-type: none">• Boreholes or Trial pits• Infiltration (Permeability) Testing• Factual Ground Investigation Report (GIR)• Geotechnical Design Report (GDR)
<p>Drawings and calculations, including:</p> <ul style="list-style-type: none">• Details of inlets, outlets and flow controls• Long and cross section drawings of proposed drainage system(s), including design levels

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| <ul style="list-style-type: none">• Details of appropriate water quality treatments• Sustainable drainage system flow calculations (PDF files showing the input and output data for flow calculations) and storm simulation plan for: 1 in 1 year, 1 in 2 year, 1 in 30 year. |
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Overcoming our objection:

You can overcome our objection by submitting information which demonstrates how surface water will be managed on site, satisfying the principles of Paragraph 103 of the NPPF and Paragraph 80 of Section 10 of 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.

Objection 2:

Proposal contrary to National Planning Guidance - Runoff Destinations:

The LLFA objects to this application and recommends refusal of planning permission until robust evidence has been submitted to the local planning authority demonstrating why higher priority discharge points for the runoff destination of surface water are not reasonably practicable in line with Planning Practice Guidance.

The [Planning Practice Guidance \(PPG\)](#) establishes a hierarchy for surface water disposal, which encourages a SuDS approach:

Generally, the aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:

- *into the ground (infiltration);*
- *to a surface water body;*
- *to a surface water sewer, highway drain, or another drainage system;*
- *to a combined sewer*

Reason

It is evident from section 5.4 of the submitted Flood Risk Assessment (320140183P) that the applicant intends to discharge surface water to a surface water body (watercourse). The applicant has not provided robust justification or evidence as to why preferable runoff destinations, notably *into the ground (infiltration)* cannot be used for this development proposal. The absence of this evidence is contrary to policy and therefore sufficient reason in itself for a refusal of planning permission.

Overcoming our objection

You can overcome our objection by submitting further evidence of your chosen runoff designation and robust justification of this runoff destination over preferable destinations set out in the hierarchy contained in the Planning Practice Guidance.

If robust justification or evidence as to why preferable runoff destinations cannot be achieved is not provided in line with Planning Practice Guidance, we will consider whether there is a need to maintain our objection to the application. Production of a justification or evidence will not in itself result in the removal of an objection.

We ask to be re-consulted following the submission of additional information. We will then provide you with comments within 21 days of receiving formal re-consultation.

Yours faithfully,

Kevin Kellett

Lead Local Flood Authority