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Date: 26 April 2017

APPLICATION CONSULTATION RESPONSE

Application Number:	3/2017/0270
Location:	Holmes Mill, Greenacre St, Clitheroe, BB7 1EB
Proposal:	Creation of new vehicular and pedestrian access and area of additional car parking associated with the adjacent Holmes Mil development.

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:

It is evident from the Flood Risk Assessment (Report no. 2015-025-010-A) that the applicant intends to change the characteristics of the site by creating a new access point, by demolishing an existing plot and by re-surfacing the proposed car park area. Owing to the size of the development proposal, this may present risks of flooding on-site and/or off-site if surface water is not effectively managed - for instance there could be an increased risk of surface water flooding to the site and to the adjacent highway network. There could also be a cumulative flood impact on the associated Holmes Mill development which has recently received planning permission (see planning application no. 3/2015/0943).

The applicant has failed to provide sufficient information relating to surface water management and therefore the flood risks resulting from the proposed development site are currently unknown. 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. The table below highlights the additional information which would need to be provided:

Site Drainage Layout, including:

- Sustainable drainage system
- Sewers
- Drains
- Existing and proposed discharge rates
- Existing and proposed volume rates
- On-site storage requirements
- Existing and proposed surface water flow paths and flood water exceedance routes

Drawings and calculations, including:

- Details of inlets, outlets and flow controls
- Long and cross section drawings of proposed drainage system(s), including design levels
- Details of appropriate water quality treatments (for example pollution prevention to Mearley Brook from hydrocarbons from proposed car park)
- 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 and 1 in 100 year + 30% climate change.

In the absence of the above information, the LLFA is unable to 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.

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.

Advice and information regarding surface water drainage can be found in our Pre-Application Standing Advice:

- <http://www.lancashire.gov.uk/media/657248/LLFA-Standing-Pre-Application-Advice.pdf>

Information on pollution control measures can be found in Pollution Prevention Guidance (PPG). This provides advice about how to prevent pollution and comply with environmental law when planning works near, in or over ponds, lakes, ditches, streams, rivers and other watercourses.

It gives information about planning the works, managing silt, concrete and cement, oils and chemicals, maintaining structures over watercourses, waste management and responding to pollution incidents. Pollution prevention guidance can be found on the Environment Agency's website:

- <https://www.gov.uk/government/collections/pollution-prevention-guidance-ppg>

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,

Chris Dunderdale
Lead Local Flood Authority