

**Phone:** 01772 534593  
**Email:** Chris.dunderdale@lancashire.gov.uk  
**Date:** 22 June 2017

Dear Sir/Madam

### APPLICATION CONSULTATION RESPONSE

|                            |                                                                                                                                         |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| <b>Application Number:</b> | 3/2017/0270                                                                                                                             |
| <b>Location:</b>           | Holmes Mill, Greenacre St, Clitheroe, BB7 1EB                                                                                           |
| <b>Proposal:</b>           | 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 **wishes to withdraw its objection** to the proposed development subject to the inclusion of the following conditions, in consultation with the LLFA:

**Condition 1: Appropriate surface water drainage scheme to be submitted -**  
Prior to the use of the car park, details of the design and implementation of an appropriate surface water drainage scheme shall be submitted to and approved in writing by the local planning authority, in consultation with the Lead Local Flood Authority.

As a minimum, those details shall include:

- a) Information about the lifetime of the development design storm period and intensity (1 in 30 & 1 in 100 year + allowance for climate change – see EA advice <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>), discharge rates and volumes (both pre and post development), temporary storage facilities, means of access for maintenance and easements where applicable, the methods employed to delay and control surface water discharged from the site, and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters, including watercourses;
- b) The drainage scheme should demonstrate that the post development surface water run-off rate will not exceed the existing pre-development runoff rate. The scheme shall subsequently be implemented in accordance with the approved details prior to the use of the car park.
- c) Any works required on or off-site to ensure the adequate discharge of surface water without causing flooding or pollution (which should include the refurbishment or removal of any existing watercourses, culverts, headwalls or unused culverts where relevant);
- d) Overland flow routes and flood water exceedance routes, both on and off site. For the avoidance of doubt, overland flow routes and flood water exceedance routes must be directed away from properties and critical infrastructure, and surface water from the development site must be contained within the red line boundary;
- e) A timetable for implementation, including phasing where applicable;
- f) Details of water quality controls, where applicable.

The scheme shall be fully implemented and subsequently maintained in accordance with the approved details prior to use of the car park. Thereafter the drainage system shall be retained, managed and maintained in accordance with the approved details.

**Reasons:**

- 1. To ensure that the proposed development can be adequately drained.
- 2. To ensure that there is no flood risk on or off the site resulting from the proposed development.
- 3. To ensure that water quality is not detrimentally impacted by the development proposal.

**Condition 2: Surface Water Lifetime Management and Maintenance Plan** - Prior to the use of the car park, details of an appropriate management and maintenance plan for the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority, in consultation with the Lead Local Flood Authority.

As a minimum, those details shall include:

- a) the arrangements for adoption by an appropriate public body / statutory undertaker, or the arrangements for management and maintenance by a property management company;
- b) the arrangements concerning appropriate funding mechanisms for the on-going management and maintenance of all elements of the surface water drainage scheme, including any mechanical components. This shall include the following details:
  - i. on-going inspections relating to performance and asset condition assessments
  - ii. operation costs for regular maintenance, remedial works and irregular maintenance caused by less sustainable limited life assets or any other arrangements to secure the operation of the surface water drainage scheme throughout its lifetime;
- c) Means of access for maintenance and easements where applicable.

The plan shall be implemented in accordance with the approved details prior to the use of the car park. Thereafter the sustainable drainage system shall be managed and maintained in accordance with the approved details.

**Reasons:**

- 1. To ensure that appropriate and sufficient funding and maintenance mechanisms are put in place for the lifetime of the development
- 2. To reduce the flood risk to the development as a result of inadequate maintenance
- 3. To identify the responsible organisation/body/company/undertaker for the sustainable drainage system.

### **Reason for removal of previous objections:**

As noted in our letter dated 26 April 2017, the LLFA originally objected to the proposed development due to insufficient information being provided to assess the principle of surface water drainage associated with the proposed development. The applicant has since responded to this objection with further clarification regarding the proposed development. After discussing this with the applicant and Local Planning Authority, the LLFA is now satisfied that the principles of surface water drainage can be secured through the inclusion of the above conditions. The LLFA is therefore satisfied that this objection can be withdrawn.

### **Site specific comments:**

#### **Sustainable Drainage Systems:**

[Paragraph 103 of the National Planning Policy Framework \(NPPF\)](#) and [Written Statement on Sustainable Drainage Systems \(HCWS161\)](#) requires that surface water arising from a developed site should, as far as it is practical, 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 [Non-Statutory Technical Standards for Sustainable Drainage Systems](#) and Planning Practice Guidance, 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 [Non-Statutory Technical Standards for Sustainable Drainage Systems](#).

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.

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 LLFA 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 pre-development greenfield runoff rate. Flow balancing should seek to achieve water quality treatment as part of a treatment train and amenity benefits as well as managing flood risk.

#### **Other comments:**

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). These risks must be fully considered as part of the design and implementation of any surface water drainage scheme for the proposed development. **Failure to do so is likely to result in an objection from the LLFA.**

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. The LLFA also wishes to be formally consulted on all subsequent drainage strategies for this proposed development.

Should you wish for further information or clarification to the contents of this letter please contact the case officer on the number provided on this letter.

Yours faithfully,

**Chris Dunderdale**  
Flood Risk Management

