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Date: 9 May 2017

APPLICATION CONSULTATION RESPONSE

Application Number:	3/2017/0357
Location:	Lower Moss Farm, Lower Ln, Longridge, PR3 2YH
Grid Ref:	361015/436658
Proposal:	Development of site for the construction of 10 no. holiday units

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 LLFA **objects** to the development proposal on the following basis:

Objection

Inadequate information to assess application - In the absence of acceptable 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 NPPF or Paragraph 80 of Section 10 of the PPG 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:

Desktop study to incorporate maps showing: <ul style="list-style-type: none">• Existing surface water flow routes, drains, sewers and watercourses• Surface water and groundwater flood risk• Geological and soil types
Proposed site plan showing: <ul style="list-style-type: none">• Exceedance routes and identification of catchment area(s)
Drainage layout plan, to include: <ul style="list-style-type: none">• Sustainable drainage system• Sewers• Drains• Watercourses• Outfall locations• Discharge rates• On-site storage requirements
Site investigation report, including the results for each sustainable drainage system (SuDS) feature of: <ul style="list-style-type: none">• Boreholes or Trial Pits• Infiltration (Permeability) Testing• Factual Ground Investigation Report (GIR)• Geotechnical Design Report (GDR)
Detailed design drawings, including: <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• Details of appropriate water quality treatments• Sustainable drainage system flow calculations (<i>PDF files showing the input and output data for flow calculations</i>) and storm simulation plan for: 1 in 1 year, 1 in 2 year, 1 in 30 year, and, 1 in 100 year + climate change

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>

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

General advice:

Sustainable Drainage Systems.

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.

[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 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 [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.

Infiltration & Permeability Testing

The Lead Local Flood Authority wishes to highlight that states no geotechnical survey has been undertaken at this stage. It is therefore unknown whether infiltration techniques will prove feasible.

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 revised 2016.

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

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.

Advice & Further Information

Further information and advice on SuDS can be found in:

- CIRIA C687 – Planning for SuDS – Making it Happen
- CIRIA C753 – The SuDS manual
- CIRIA C635 - Designing for exceedance in urban drainage: good practice
- CIRIA C698 – Site handbook for the construction of SUDS

Multi-Functional SuDS

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, bioretention gardens, permeable paving, rills, rainwater harvesting, hardscape storage, micro-wetlands, and bioretention tree pits.

Land Drainage Consent

The proposals indicate that the applicant may intend to discharge surface water into the open watercourse at the west side of the development site.

Under the Land Drainage Act 1991 (as amended by the Flood & Water Management Act 2010), you need consent from the Lead Local Flood Authority if you want to build a culvert or structure (such as a weir) or carry out works within the banks of any ordinary watercourse which may alter or impede the flow of water, regardless of whether the watercourse is culverted or not.

As a minimum, the applicant will be expected to:

- Carry out studies of the existing culvert/watercourse condition and capacity;
- Undertake an examination of the downstream condition and implications of the development proposal, and;
- Restrict discharge rates so that the peak runoff rate from the development to the ordinary watercourse for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event should never exceed the peak greenfield runoff rate for the same event.

As per Lancashire County Council Consenting and Enforcement Policy, it should be noted 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: <http://evidence.environment-agency.gov.uk/FCERM/en/FluvialDesignGuide/Chapter8.aspx?pagenum=6>

You should contact the Flood Risk Management Team at Lancashire County Council to obtain Land Drainage Consent. Information on the application process and relevant forms can be found here:

<http://new.lancashire.gov.uk/roads-parking-and-travel/roads/flooding/alterations-to-a-watercourse.aspx>

For the avoidance of doubt, once planning permission has been obtained it does not mean that land drainage consent will be given.

Yours faithfully,

Kevin Kellett

Lead Local Flood Authority