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Date: 13th April 2018

APPLICATION CONSULTATION RESPONSE

Application Number:	3/2017/1020
Location:	Unit A to C Up Brooks, Clitheroe, BB7 9SE
Grid Ref:	E 375182, N 442128
Proposal:	Proposed new production unit

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 Position

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 application lies within Flood Zone 2 and Flood Zone 3 defined by the Planning Practice Guidance as having a medium and high probability of flooding. Therefore 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 the following detailed information 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 :

Hierarchy for Surface Water Disposal

- Evidence that the surface water run off is discharged as high as possible in the Planning Practice Guidance (PPG) drainage hierarchy

Site and Drainage Layout

- Proposed site plan showing exceedance routes and building slab level

Site investigation report, including the results for each SuDS feature of :

- Boreholes or Trial Pits
- Infiltration (Permeability) Testing
- Factual Ground Investigation Report (GIR)
- Geotechnical Design Report (GDR)

Drawings and Calculations

- 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 (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 + climate change as per latest EA guidance

Attenuation Volume Calculations

- Breakdown of attenuation volume calculations in oversize pipes, manholes and attenuation tank

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 the above detailed information 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.

Overcoming Our Objection : You can overcome our objection by submitting the following information :

1. Evidence that the Planning Practice Guidance for drainage hierarchy has been followed
2. Geotechnical site reports.

3. Detailed drainage drawings including plan showing exceedance routes.
4. Sustainable drainage system flow calculations.
5. Attenuation volume calculations.

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

Yours faithfully,

Steven Warren
Lead Local Flood Authority