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Date: 20 February 2018

APPLICATION CONSULTATION RESPONSE

Application Number:	3/2018/0008
Location:	30 Peel Park Avenue, Clitheroe
Proposal:	Demolition of existing dwelling and erection of 34 bungalows for the over 55s with associated access, parking, landscaping and open space.

Thank you for inviting the Lead Local Flood Authority (LLFA) to comment on the above application. The Flood and Water Management Act (FWMA) 2010 introduces a range of new powers, duties and responsibilities and makes Lancashire County Council a Lead Local Flood Authority (LLFA). 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 at the time of this response.

Lead Local Flood Authority Position:

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

Objection 1 - Inadequate FRA:

In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following reason:

Reason:

The FRA submitted with this application does not fully comply with the requirements set out in paragraph 30 of the Planning Practice Guidance, and therefore paragraph 103 of the NPPF cannot be satisfied. The submitted FRA does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In particular, the submitted FRA fails to:

- a) Adequately assess the risk of surface water flooding to the site; specifically in regards to the surface water flood risk along the eastern and western boundaries of the site and the surface water flood risk around the proposed site access (including impacts on access/egress). The FRA also fails to provide sufficient details relating to mitigation measures that may be required in order to manage the risk of surface water flooding post development.

Whilst it is claimed in section 7 of FRA version 02 dated 07/12/17 that the existing ditch along the eastern boundary will mitigate the risk of overland flooding from higher land, it is noted that no evidence has been provided to substantiate this claim.

- b) Adequately assess the risk of flooding from various sources that are known to be within or on the site boundary. This includes both open watercourses and the spring to the North West corner. The FRA also fails to provide sufficient details relating to mitigation measures that may be required in order to manage the risk of from these sources of flooding (including providing access for future maintenance).
- c) Sufficiently demonstrate that surface water can be safely managed for the lifetime of the development. It is noted that the applicant intends to dispose of surface water via an existing watercourse that is located along the western boundary of the site. Insufficient details have been provided regarding this watercourse and therefore it is unknown whether it is sufficiently sized and in a sufficient condition to accept the flows that will be generated from the site. The FRA should also provide an Indicative drainage plan which includes the location of the proposed outfalls.

Overcoming our objection:

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and that demonstrates that the development will not increase flood risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved then we are likely to maintain our objection to the application. Production of a revised FRA will not in itself result in the removal of an objection. The additional evidence requested will also need to be provided.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Yours faithfully,

Alistair Graham

Flood Risk Management

