REFORD

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John Macholc Planning Department Ribble Valley Borough Council Council Offices Church Walk Clitheroe BB7 2RA

Dear Mr Macholc

CONVERSION OF AN EXISTING RESTAURANT (A3) TO CREATE TWELVE APARTMENTS (C3) AND THE SITING OF FOUR HOLIDAY LETS DOG AND PARTRIDGE, HESKETH LANE, CHIPPING, PR3 2TH APPLICATION NO. 3/2018/0786

I refer to the following comments received from the Lead Local Flood Authority dated 21st December 2018 with regards the above planning application. The comments are repeated below along with our responses so that the LLFA may make a substantive response to the application.

1. The methodology used for calculating the existing surface water runoff rates do not appear to comply with the methodology outlined in Section 24.5 of the CIRIA SuDS Manual 2015. In particular, the applicant has failed to demonstrate that they have properly investigated and simulated the existing surface water drainage system to derive a head-discharge relationship at the outfall. Instead, the applicant's methodology incorrectly assumes that all of the surface water generated from the existing impermeable area will discharge at the rate shown in the drainage strategy report (22.8l/s). This is clearly not the case as noted in section 3.6 of the

report. The applicant's methodology also fails to take account of the hydraulic characteristics of the receiving drain; all of which are likely to influence the maximum pass-through flow rate from the existing piped system. This will need to be brought to the attention of the applicant so that the existing surface water runoff rates can be reassessed using the methodology outlined in Section 24.5 of the CIRIA SuDS Manual 2015.

<u>Response</u>

Section 24.5 of the CIRIA SuDS Manual states that where records of the previously developed system are not available the runoff from the site can be represented by the Greenfield response from impermeable soils.

As the site is small (0.29 ha), it is intended that the surface water runoff from the developed site will be restricted to 5 I/s prior to discharge into the receiving drain.

The receiving drain is 200mm in diameter, which is more than capable of taking 5.0 l/s and is clean, allowing an uninterrupted flow of surface water to the watercourse.

A revised surface water drainage design and drainage layout drawing are attached to this letter.

2. The applicant has failed to provide sufficient details relating to the proposed surface water outfall location (i.e. the size, route and condition of the receiving drain). In the absence of this information, it is not clear whether the receiving drain will have sufficient capacity and will be in a sufficient condition to accept the flows generated from the development site. It is also unclear whether the applicant will have the right to connect to the drain, considering the drain is likely to be privately owned. This will need to be brought to the attention of the applicant so that further clarification can be provided in this regard.

<u>Response</u>

The route of the drain to the outfall on the watercourse is shown on the attached sketch. The drain is clean and in good condition. The drain is already taking flows generated from the existing site and the surface water drainage design submitted in support of the application provides a reduction in the surface water discharge from the post development site by installing a Hydrobrake and attenuation on the site. The drain, therefore, has sufficient capacity and is in a sufficient condition to accept the flows generated from the development site.

The Client has the right to connect to the drain as it is within his ownership.

3. The preliminary surface water drainage layout plan (appendix B of the drainage strategy report) appears to show surface water from a small area of the site being drained to ground (i.e. the plots adjacent to Hesketh Lane). This arrangement conflicts with the conclusions of the applicant's drainage strategy report, which suggest that infiltration will not be possible due to existing ground conditions. This will need to be brought to the attention of the applicant so that further clarification can be provided in this regard. Should the applicant intend to proceed with the use of soakaways for part of the site drainage, then they will first need to demonstrate that they have worked through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365 revised 2016. This is to confirm the suitability of soakaways within the development site. If soakaways are shown to be unsuitable, then the applicant will need to provide an alternative method for draining this area of the site.

<u>Response</u>

The words 'to ground' within the drainage strategy does not mean via infiltration but onto the ground as what currently happens, i.e. the downpipes for the small area of building roof discharge onto the ground.

The building structure is remaining unchanged. There is difficulty in providing a drain across the front of the building due to its close proximity to the public highway. The down pipes at the corners of the building frontage can be connected to the proposed drainage system and have been taken account of within the calculations. The downpipes on the building entrance porch roof will discharge onto the ground or into planters.

4. The applicant does not appear to have provided a topographical survey as requested in my previous response. This will need to be brought to the attention of the applicant so that the supplementary information can be provided.

<u>Response</u>

A topographical survey of the existing site is attached to this letter.

I trust the above will now enable the Lead Local Flood Authority to make a substantive response to the application.

Yours sincerely,

Bob Ford

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