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**Date:** 1 August 2019

Dear Sir/Madam

### APPLICATION CONSULTATION RESPONSE

<b>Application Number:</b>	3/2019/0661
<b>Location:</b>	Land at Petre Wood Close, Langho, BB6 8FE
<b>Proposal:</b>	31 affordable two and three-bedroom houses and two-bedroom bungalows (for rent and for shared ownership).

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.

#### **Lead Local Flood Authority (LLFA) Position:**

The LLFA is currently unable to provide you with a substantive response as insufficient information has been submitted with this application. The table below details a list of information that will be required in order for the LLFA to provide you with a substantive response:

Outstanding information	
A desktop study to incorporate maps showing: <ul style="list-style-type: none"> <li>- The topography of the development site; with contours at 1m intervals</li> <li>- Existing surface water flow routes, drains, sewers and watercourses</li> <li>- Details of how surface water is currently drained within the existing site</li> <li>- Surface water and groundwater flood risk</li> <li>- Geological and soil types</li> </ul>	X
An appropriate site-specific flood risk assessment where on is required, completed in line with the Environment Agency guidelines: <a href="https://www.gov.uk/planning-applications-assessing-flood-risk">https://www.gov.uk/planning-applications-assessing-flood-risk</a>	X
An appropriate assessment of the existing pre-development surface water runoff rates and volumes for the 1 in 1 year, 1 in 2 year (Qbar), 1 in 30 year and 1 in 100 year rainfall events.	X

Evidence or justification to demonstrate why higher priority discharge points, namely into the ground (infiltration), are not reasonably practicable in line with the drainage hierarchy in the planning practice guidance.	<b>X</b>
Surface water flow calculations for the proposed surface water drainage network. The calculations must show the full network design criteria, pipeline schedules and simulation outputs for the 1 in 1 year, 1 in 30 year and 1 in 100 year return periods, plus an appropriate allowance for climate change and urban creep.	<b>X</b>
A site plan that shows all on-site surface water catchment areas, i.e. areas that will contribute to the proposed surface water drainage network. The plan should also show how surface water will be managed in any non-drained areas, i.e. gardens and public open space.	<b>X</b>
A site plan that shows any overland flow routes and flood water exceedance routes, both on and off site	<b>X</b>
Details of how the proposed surface water drainage system will be managed and maintained over the lifetime of the development.	<b>X</b>

### **Flood risk assessment:**

An important part of the planning application process is consideration of flood risk as detailed under Footnote 50 of Paragraph 163 of the National Planning Policy Framework (NPPF). This is facilitated through a site-specific flood risk assessment (FRA) which is required for:

- Developments in flood zones 2 or 3;
- Developments of more than 1 hectare in flood zone 1;
- Developments of less than 1 hectare in flood zone 1 where they could be affected by sources of flooding other than rivers and the sea
- Developments in an area within flood zone 1 which has critical drainage problems as notified by the Environment Agency.

Whilst the above development is stated as being less than 1 hectare on the application form, we note the difference is only 100 square meters which gives a very small margin for error. We would therefore recommend for the Local Planning Authority to check the total site area of the site to ensure compliance with the requirements of the NPPF. If the total site area is considered to be 1 hectare or more, then the application should be supported by a site-specific FRA in line with the requirements of the NPPF.

**Method for disposing of surface water from the site:**

It is evident from the outline drainage layout that the applicant intends to discharge surface water to an existing ordinary watercourse that is located roughly 19m beyond the north eastern boundary of the site. In order for this to be considered acceptable, the applicant will first need to provide evidence or justification to demonstrate why other higher priority discharge options, namely into the ground (infiltration), are not reasonably practicable in line with the drainage hierarchy in the Planning Practice Guidance.

The LLFA would also recommend for the red edge boundary of the site to be suitably extended to include the proposed surface water outfall location.

**Re-consultation:**

The LLFA asks to be re-consulted following the submission of the above information. Once consulted, we will then provide you with a substantive response within 21 days, unless otherwise agreed. For clarity, no further processing of this consultation request will take place until the above information has been received in full.

Yours faithfully,

**Chris Dunderdale**

Lead Local Flood Authority

