

Sharon Craig

From: Laura Eastwood
Sent: 29 January 2021 15:07
To: Planning
Subject: FW: 3/2019/1104

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Hi please can this email be uploaded.
Many thanks
Laura

Good afternoon Laura,

I'm sorry for the further delay in getting back to you regarding the above application. I've now completed my initial assessment of the proposals, and there appears to be some disparity between the information presented within the flood risk assessment and the information presented on the latest development plans. I suspect that's because the plans have evolved somewhat since the original flood risk assessment was prepared, though it does need highlighting to the applicant to ensure that flood risk is appropriately considered and mitigated for within their latest development proposals. Please see below:

- The applicant has acknowledge within their flood risk assessment that there's currently a medium to high risk of surface water flooding in the south eastern extent of the site. The applicant has attributed that risk to a combination of overland surface water runoff and some exceedance of culvert capacity in the land to the north. To mitigate that risk following re-development, the applicant has recommended for a 55m section of the existing culvert to be daylighted through the site to intercept overland runoff and to provide greater channel capacity within the development boundary. The applicant has also recommended for the finished floor levels of the dwellings to be raised by 150mm to manage any residual risk that remains within the site. However considering the latest proposals now no longer include plans to daylight the culvert, any flood mitigation benefits that scheme may have brought will now no longer be realised. With that in mind, it's unclear at this stage how surface water flood risk will be otherwise mitigated in that area to ensure any dwellings remain sufficiently protected over the full lifetime of the development. It's also unclear at this stage whether the 150mm threshold on the finished floor levels will be sufficient, or whether additional freeboard will be needed to manage any residual risk that remains within the site. Please can you bring this to the attention of the applicant and ask for further clarification to be provided in that regard? The flood risk assessment will also need to be updated to take account of the recent development changes.
- The applicant has indicated within their flood risk assessment that existing overland flow paths will be maintained where possible, however it's not clear at this stage how that will be achieved considering the arrangement set out on the latest development plan. Please can you bring this to the attention of the applicant and ask for further clarification to be provided in that regard? I would like to see a plan showing the existing and proposed overland flow paths for comparison purposes.
- The applicant has indicated within their flood risk assessment that the condition of the 600mm x 600mm stone flagged culvert is currently unknown. Whilst I accept this will have

been the case at the time the report was written, I understand the culvert has since been investigated by the applicant and more is now known about the culvert's construction, condition and capacity. Please can you ask the applicant to append these details to the report and to also summarise their findings and conclusions?

- The applicant has indicated within their flood risk assessment that private surface water storage tanks will be needed to store volumes up to the 100 year return period. Please can you ask the applicant to check these details are correct, as no private storage tanks appear to have been included in the latest surface water drainage proposals?

With regard to the surface water drainage strategy, I've also identified the following issues that will need clarifying by the applicant:

- I note the applicant's proposing to discharge surface water to the culverted watercourse at a maximum rate of 11.7l/s. However it's not clear at this stage whether that's runoff which physically enters the culvert now, or whether it's additional runoff that will enter the culvert on top of what's currently there now. If it's the latter, then the applicant will need to further investigate whether the culvert has sufficient capacity and is in a sufficient condition to accept the additional 11.7l/s from the site, without resulting in any increased risk of flooding on or off site. The applicant will also need to model their drainage network with a surcharged outfall to check that the system is able to discharge effectively should the culvert ever surcharge during flood conditions. Please can you bring these issues to the attention of the applicant and ask for further evidence to be provided in that regard?
- As far as I can tell, the applicant doesn't appear to have included any additional allowance for future urban creep, i.e. the conversion of permeable surfaces to impermeable surfaces over time; such as surfacing of front gardens to provide additional parking spaces, extensions to existing buildings and creation of large patio areas etc. If urban creep isn't allowed for within the network design, then it's not clear how the future impacts of urban creep will be otherwise mitigated over the lifetime of the development. Please can you bring this to the attention of the applicant and ask for further clarification to be provided in that regard?
- I understand the applicant has only applied an additional 30% to their drainage network to allow for future climate change. Latest guidance states that an additional 40% should be applied to ensure there is no increase in the rate of runoff discharged from the site for the upper end allowance.
- I understand the applicant's surface water drainage proposals have been updated as recent as 30 September 2020, however the latest drainage proposals don't appear on the planning website. Please can you bring this to the attention of the applicant and ask for the latest proposals to be provided for completeness.

As discussed, the applicant is welcome to contact me directly should they wish to discuss these points further.

Many thanks,

Chris

Chris Dunderdale
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