

**Phone:** 0300 123 6780  
**Email:** SUDS@lancashire.gov.uk  
**Date:** 14 September 2020

Dear Sir/Madam

## APPLICATION CONSULTATION RESPONSE

<b>Application:</b>	3/2020/0544
<b>Location:</b>	Eaves Hall Moor Lane West Bradford BB7 3JG
<b>Proposal:</b>	Construction of 15 eco lodges and infrastructure to provide additional accommodation for Eaves Hall.

Thank you for consulting the Lead Local Flood Authority (LLFA) 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 requirements	
a)	An appropriate site specific flood risk assessment which is required for this application as the total site area is over 1ha in size. Whilst we recognise a flood risk assessment has already been included within the submission, that flood risk assessment is incomplete as it fails to consider the risk of flooding from all sources, including surface water, ground water and ordinary watercourses. The flood risk assessment also fails to consider the impacts of climate change over the lifetime of the development.
b)	An assessment of the existing and proposed surface water runoff rates, volumes and on-site surface water storage requirements. This is to demonstrate compliance with standards S2, S4, S5 and S6 of the non-statutory technical standards for sustainable drainage systems; at least in principle.

c)	<p>A surface water drainage layout plan that shows how surface water will be managed over the lifetime of the development. The surface water drainage layout plan should include details of all sustainable drainage proposals, temporary surface water storage facilities, flow controls, water quality treatments and outfall locations. The plan should be appropriately labelled, with details of all pipe/structure references, dimensions and design levels (including ground levels and finished floor levels (in AOD)).</p> <p>If the surface water drainage proposals have not yet been finalised, then an outline surface water drainage strategy can be accepted, subject to the final details being provided at detailed design. However this would require a suitability worded pre-commencement planning condition to be added to the decision notice.</p>
d)	<p>Surface water flow calculations to demonstrate the suitability of the surface water drainage proposals and to demonstrate compliance with standards S7 and S8 of the non-statutory technical standards for sustainable drainage systems; at least in principle. If the intention is to dispose of surface water via infiltration methods, then evidence of an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365 revised 2016 will also need to be provided. This is to confirm the suitability of infiltration as a method of surface water disposal and to confirm the rate of infiltration within the site.</p>
e)	<p>A final site plan that shows all on-site surface water catchment areas, i.e. areas that will contribute, either directly or indirectly, to any positively drained network. The plan should also detail how surface water will be managed within any non-drained areas of the site, for example gardens, shared spaces and public open space*</p>
f)	<p>A site plan that shows all overland flow routes and flood water exceedance routes, both on and off site. This is to demonstrate compliance with standard S9 of the non-statutory technical standards for sustainable drainage systems*</p>
g)	<p>Details of how the surface water drainage will be managed and maintained over the lifetime of the development*</p>

*\* it may be possible for items e, f and g to be secured through a suitably worded pre-commencement planning condition. However items a, b, c and d will need to be provided in full before a substantive response can be given.*

**Land Drainage Consent:**

The LLFA are the consenting body for works on Ordinary Watercourses. Under Section 23 of the Land Drainage Act 1991 (the “LDA”) (as amended by paragraph 32 of Schedule 2 of the FWMA 2010) anyone who intends to carry out works which may obstruct or affect the flow of an ordinary watercourse needs written consent from Lancashire County Council.

It is important to note that Land Drainage Consent is a separate application process that lies outside the planning legislation. It should not be assumed therefore the grant of planning permission means that Land Drainage Consent will automatically be given. Parallel processing of Land Drainage Consent applications is advised, as any land drainage consenting issues could directly impact the suitability of the proposed site layout.

Land Drainage Consent applications can take up to eight weeks to process following receipt of all required information and payment (£50 per structure). Retrospective consent cannot be issued.

**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

