

**Contact:** Please contact the Local Planning Authority

**Date:** 17<sup>th</sup> December 2021

Dear Local Planning Authority,

Thank you for inviting the Lead Local Flood Authority (LLFA) to comment on the below application.

### PLANNING APPLICATION CONSULTATION RESPONSE

<b>Application Number:</b>	3/2021/1134
<b>Location:</b>	Land East of Chipping Lane, Longridge
<b>Proposal:</b>	Development of Phases 2 and 3 for the erection of 198 dwellings, including affordable housing and housing for older people, with associated landscaping, SUDS, LEAP, and areas of open space.

Under the Flood and Water Management Act 2010 the LLFA is the responsible 'risk management authority' for managing 'local' flood risk which refers to flood risk from surface water, groundwater or from ordinary watercourses. The LLFA is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015. It is in this capacity this response is compiled.

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. The comments given have been composed based on the current extent of the knowledge of the LLFA and information provided with the application at the time of this response.

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

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

## **Inadequate Drainage Strategy**

In the absence of an acceptable drainage strategy to assess the principle of surface water sustainable drainage associated with the proposed development, we object to this application and recommend refusal of planning permission until further information has been submitted to the local planning authority.

### **Reason**

Paragraph 169 of the NPPF requires major developments to incorporate sustainable drainage systems that:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.

The lack of adequate information in relation to surface water drainage means the LLFA cannot assess whether the development proposal meets the requirements of Paragraph 169 of the NPPF or the PPG in principle. In particular.

- There are significant inconsistencies between the Betts Hydro Report from November 2021 (HYD371\_CHIPPING.LANE\_FRA&DMS – Rev 2) and the Barratt Homes Drainage Strategy from September 2021 (REV A – 21<sup>st</sup> September 2021) and its references to the Betts Hydro Report from December 2018 (HYD371\_CHIPPING.LANE\_FRA&DMS – Rev 1), and therefore it is unclear how surface water is intended to be managed over the lifetime of the development
- The flood risk assessment and drainage strategy provided are scanned copies and therefore some the design details on the indicative drainage layout are illegible, meaning that a full assessment of the information can not be completed.
- It is not clear from the information provided how urban creep will be managed within the lifetime of the development, it is proposed that urban creep will be factored in, however the information provided is unclear how this will be achieved.

The submission of basic information on how surface water is intended to be managed is vital if the local planning authority is to make informed planning decisions. In the absence of acceptable information regarding surface water sustainable drainage, the LLFA cannot assess whether the development proposed meets the requirements of Paragraph 169 of the NPPF or the PPG in principle. This is sufficient reason in itself for a refusal of planning permission.

## **Overcoming our Objection**

You can overcome our objection by submitting information which demonstrates how surface water will be managed on site, satisfying the principles of Paragraph 169 of the NPPF and the PPG.

If this cannot be achieved we will consider whether there is a need to maintain our objection to the application. Production of this information will not in itself result in the removal of an objection.

We ask to be re-consulted following the submission of additional information addressing surface water drainage proposals. We will provide you with comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate level of information has been submitted which satisfies the principles outlined above.

## **LLFA Advice**

The LLFA expects the applicant to incorporate an urban creep allowance into their calculations upon submission of details, in order to correctly calculate the storage requirements for the development, further guidance on this can be found in the CIRIA SuDS Manual, C753 (2015).

The LLFA makes note that according to the Betts Hydro flood risk assessment from November 2021 (HYD371\_CHIPPING.LANE\_FRA&DMS – Rev 2) the Qbar set for phases 2 and 3 is 84.9l/s and it is intended that this shall be for the overall discharge volume for the development. The LLFA expects the applicant to take into consideration any overlooked factors, such as urban creep as these could result in the proposed discharge volumes being greater than that of calculated greenfield Qbar rate and therefore unacceptable. The applicant is reminded that cumulative discharge must not exceed the greenfield run off rates and volumes, in line with Standards 2 and 4 of the DEFRA Technical Standards for SuDS. The applicant must provide evidence that attenuation has been provided for the full site, including any non-drained areas that have the potential to directly or non-directly contribute to the sustainable drainage system.

In addition to this, the table in the Barratt Homes Drainage Strategy from September 2021 (REV A – 21<sup>st</sup> September 2021) states that the greenfield rate in l/s/ha for phase 1 was set at 8.3l/s/ha, and that the rate proposed for phase 2 and 3 is set to 13.6l/s/ha, no justification has been provided to demonstrate the suitability of this discharge rate. The LLFA expects the applicant to justify the reason for the varied greenfield rates across the whole development, this is to demonstrate compliance with Standard 2 and 4 of the DEFRA Technical Standards for SuDS.

If the applicant intends to discharge the surface water from phase 2A into phase 1, the LLFA expects the applicant to provide a combined model of both phases. This is to demonstrate compliance with Paragraph 167 of the NPPF and demonstrate the suitability of discharging surface water from phase 2A into phase 1.

The LLFA expects a 40% allowance for Climate Change in line with the Flood Risk Assessment guidance on climate change allowances. Specifically referring to Table

1 and the note beneath stating that 'Design your drainage system to make sure there is no increase in the rate of runoff discharged from the site for the upper end allowance'. Any revised drainage strategy and drainage layout would therefore have to be designed to accommodate the climate change allowance, this should be reflected in the design for attenuation, piped network and the discharge volumes.

**Material Changes to this Planning Application**

If there are any material changes to the submitted information which impact on surface water, the local planning authority is advised to consider re-consulting the LLFA. Please send a copy of the decision notice to our mailbox.

**If you decide to approve contrary to our response**

If the Local Planning Authority grants planning permission for this development contrary to the LLFA's objection, we will be unable to provide comment on the discharge of any surface water or flood risk conditions which we have not recommended.

Yours faithfully,

**Harry McGaghey**  
Lead Local Flood Authority