Contact: Please contact the Local Planning Authority

Date: 14 March 2025

Dear Local Planning Authority,

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

PLANNING APPLICATION CONSULTATION RESPONSE

Application Number:	3/2024/0020
Proposal:	Erection of proposed extension to the dairy warehouse; new staff parking; landscaping across the whole site and associated works.
Location:	Alston Dairy Alston Lane Longridge PR3 3BL

The Lead Local Flood Authority 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 are advisory and it is the decision of the Local Planning Authority whether any such recommendations are acted upon. The comments given have been composed based on the extent of the knowledge of the Lead Local Flood Authority and information provided with the application at the time of this response.

Lead Local Flood Authority Position

The Lead Local Flood Authority **objects** to the above application on the basis of:

Objection(s)

Objection 1 – Inadequate Surface Water Sustainable Drainage Strategy

In the absence of an acceptable surface water sustainable 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

Paragraphs 181 and 182 of the National Planning Policy Framework require major developments to incorporate sustainable drainage systems that:

- take account of advice from the Lead Local Flood Authority;
- have appropriate proposed minimum operational standards;
- have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- where possible, provide multifunctional benefits.

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 Lead Local Flood Authority cannot assess whether the development proposed meets the requirements of Paragraph 182 of the National Planning Policy Framework or the Planning Practice Guidance in principle. This is sufficient reason in itself for a refusal of planning permission.

In particular, the submitted surface water sustainable drainage strategy fails to:

- **Provide appropriate minimum operation standards for peak flow control**, in line with the Defra Technical Standards for Sustainable Drainage Systems, therefore, is contrary to paragraph 182 of the National Planning Policy Framework.

  Standards S2 and S3 of the Defra Technical Standards for Sustainable Drainage Systems require applicants to demonstrate that post-development peak flows of any proposed development do not exceed existing pre-development surface water runoff rates for the 100% (1 in 1-year) and 1% (1 in 100-year) annual exceedance probability rainfall event.

  The submitted surface water sustainable drainage strategy fails to contain peak flows within these parameters as evidence has not been provided to demonstrate how the peak runoff rate from the development to the surface water body for the 100% (1 in 1-year) annual exceedance probability rainfall event and/or the 1% (1 in 100-year) annual exceedance probability rainfall event will not exceed the peak greenfield runoff rate for the same event.

  Therefore, the proposals are contrary to Standard S2 of the Defra Technical Standards for Sustainable Drainage Systems. This is sufficient reason in itself for a refusal of planning permission.

- **Demonstrate the principle of development.** The proposed drainage strategy involves an off-site connection to the culverted ordinary watercourse through third party land, however, no evidence of an agreement in principle with the has been provided to the Local Planning Authority. Should no agreement be reached, it may not be possible to drain the site, hence the Lead Local Flood Authority are currently unable to agree to the principle of development and recommend the refusal of planning permission, until evidence of an agreement in principle with the appropriate parties, or robust evidence of a 'plan b' outfall location, should a connection to the culvert not be possible, has been submitted to and approved in writing by the Local Planning Authority.
- **Provide evidence to demonstrate why pumping is required** to drain the development site in line with Standard S12 of the Defra Technical Standards for Sustainable Drainage Systems.

  Standard S12 of the Defra Technical Standards for Sustainable Drainage Systems requires that pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity. The applicant has not provided robust evidence as to why pumping is required to drain the development site, nor provided evidence as to why the proposed drainage system cannot be drained by gravity. This is sufficient reason in itself for a refusal of planning permission.

Overcoming our Objection

You can overcome our objection by submitting information that covers the deficiencies highlighted above and demonstrates how surface water will be managed on-site, to satisfy Paragraphs 181 and 182 of the National Planning Policy Framework, the Planning Practice Guidance, and the Defra Technical Standards for Sustainable Drainage Systems. If this cannot be achieved we are likely to maintain our objection to the application. Production of this information will not in itself result in the removal of an objection.

The Lead Local Flood Authority asks to be re-consulted with the results of the amended site-specific flood risk assessment and/or amended sustainable drainage strategy and/or SuDS Pro-forma. We will provide you with further comments within 21 days of receiving formal re-consultation. Re-consultations should be sent to our identified mailbox.

Our objection will be maintained until the amended documents, as outlined above, have been received. Production of the amended documents will not in itself result in the removal of an objection.

If the applicant wishes to discuss our objection with the Lead Local Flood Authority, they can do so through our planning advice service.

Lead Local Flood Authority - Site-Specific Advice

The following advice is provided to inform the applicant and the Local Planning Authority of any additional concerns with the application:

- **Contributing Area –** the submitted drainage strategy and SuDS Pro Forma identify the contributing area for the proposed development to be 0.863 ha, which is stated to be the impermeable areas of the proposed development only. Contradictorily to this post-development area, the pre-development greenfield runoff rate is based on a contributing area of 1.4 ha. Chapter 24.2 of the CIRIA SuDS Manual states that the runoff areas used in any estimation methods should be consistent. The UK SuDS online tools suggests that the greenfield Qbar runoff rate for the proposed catchment of 0.863 ha would be closer to 7 l/s. The proposed discharge rate of 9.8 l/s is approximately 40% greater than this figure. Therefore, the proposed drainage strategy does not comply with standard S2 of Defra's Technical Standards for SuDS. Furthermore, by failing to limit the discharge of surface water to the appropriate greenfield runoff rate, the overall volume of surface water discharged from the site will likely be greater than the equivalent greenfield rate, meaning that the proposed drainage strategy also fails to comply with standard S4.

  Discharge Points – the proposed drainage strategy involves three distinct catchments, each with their own attenuation tank and discharge point. As such, each of these systems must be considered independently of the overall drainage strategy. The applicant must provide an indicative drainage strategy with this application for full planning permission that demonstrates that each of the proposed drainage systems can achieve satisfactory arrangements to facilitate the discharge of surface water from the site.

  - The drainage system that serves the proposed storage compound to the north is shown to outfall to the culverted watercourse within the site boundary. This is acceptable in principle, with further details to be provided at the detailed design phase such as a survey of the culvert to confirm its capacity and condition.

  - The drainage system which serves the proposed extension of the existing facilities also proposes to outfall to the culverted watercourse, however this connection is off the edge of the included drainage layout and would appear to connect to the culvert outside of the red edged boundary, potentially in third party land. While this may be acceptable in principle, the applicant must clarify the relevant land ownership and any required agreements to facilitate the proposed connection.

  - The drainage system which would serve the proposed farm shop would outfall to the existing drainage system. It appears that no information relating to the existing drainage system has been provided in the submitted details, however. The submitted drainage layout plan is labelled "connection to existing surface water manhole if confirmed to connect to watercourse and if the invert is sufficiently deep. These qualifying conditions must be proven prior to the detailed design phase, or, if that cannot be achieved, a "Plan B" strategy for this system must be provided.

- **Pumping Stations –** the submitted drainage layout plan includes three discharge points, each of which are labelled "pumping station may be required". In accordance with standard S12 of the Defra Technical Standards for SuDS, pumping surface water should be avoided wherever a gravity connection can be achieved. The proposal to pump surface water must be accompanied by a robust justification as to why a gravity fed system is not feasible. The submitted drainage strategy does not explicitly state that pumping stations will be used, however, should pumping be deemed necessary through the detailed design phase due to the lack of fall across the site, the applicant should be aware that a robust justification must be provided with their final drainage strategy.

- **Ground Conditions –** Section 2.2 of the submitted drainage strategy refers to tools such as the BGS' online mapping resources for their desktop study of ground conditions at the site of the proposed development. The appended borehole record appears to be taken from a site >500 m to the west of the proposed development, and the appended bedrock geology maps are 1:50,000 in scale. As such, this assessment of ground conditions can only be taken as indicative, and evidence of a site investigation and test results to confirm infiltration rates and groundwater levels must be provided with the final drainage strategy. If this testing identifies that infiltration is feasible on the site, then the applicant must update their drainage strategy accordingly in order to satisfy the hierarchy of drainage options as set out in the PPG.

- **Drainage Calculations –** the drainage calculations appended to the submitted drainage strategy include several inappropriate design parameters:

    - **Volumetric Runoff Coefficient (CV) –** the default Cv value of 0.750 has been applied to the submitted calculations. This value is intended to be representative of the total site area of a typical catchment, including both permeable and impermeable surfaces. The applicant should amend their contributing area to consider any permeable areas that may contribute to the drainage system, in which case using a Cv value of 0.750 would be appropriate. If the applicant intends to use only the impermeable areas, as is currently the case, then a Cv value of 1.000 must be applied as a minimum.

    - **Additional Storage –** the default additional storage figure of 20.0 m^3/ha has been applied. The applicant must demonstrate how this additional storage will be provided (e.g. through temporary storage or designed temporary ponding areas) or amend their calculations and apply an additional storage figure of 0 m^3/ha.

    - **Maximum Rainfall –** the applied default value of 50 mm/hr is appropriate for the initial modelling of the required pipe sizes, but a higher figure must be applied to the storm simulation models (e.g. 250 mm/hr). This is because this figure provides a cap to the modelled rainfall while the design storm events with the appropriate allowances for climate change could include

rainfall that exceeds this 50 mm/hr cap. This means that the modelled storm events may not appropriately represent the required design storm event.

- **SuDS Components –** the submitted drainage strategy is based on a traditional pipe and tank arrangement only, which does not strictly meet the definition of a Sustainable Drainage System. Paragraph 182 of the National Planning Policy Framework is clear that sustainable drainage systems should, where possible, provide multifunctional benefits. The proposed sustainable drainage system does not provide multifunctional benefits that include the 'four pillars' of water quality, water quantity, amenity and biodiversity, in line with paragraph 055 of the Planning Practice Guidance, or provide evidence that such techniques are not possible, in line with paragraph 059 of the Planning Practice Guidance. Given the available open space on the site, the applicant should consider alternative SuDS components that can help to deliver the multifunctional benefits of SuDS.

- **Culverted Watercourse –** the ultimate discharge point for the majority of the site is a culverted watercourse that runs northwest to southeast through the existing site. Any works to a culverted watercourse will require Ordinary Watercourse Consent from the Lead Local Flood Authority. In line with the county councils Ordinary Watercourse Regulation Policy OWC2, the applicant should consider reopening (daylighting) this culvert to improve its hydrological functionality, which would also contribute to the multifunctional benefits of the overall drainage system, as discussed above. If this is not possible, the appropriate evidence, as required by the county councils Ordinary Watercourse Regulation policies and guidance, will need to be provided as part of the applicants Ordinary Watercourse Consent application.

- **Climate Change Allowances –** the submitted drainage strategy states that a 50% allowance for climate change will be applied for the 1 in 100 year storm (1% AEP event), while the calculations appended to the submitted drainage strategy include a 35% allowance for the 1 in 30 year storm (3.3% AEP event). For the avoidance of doubt, the final detailed drainage strategy will need to include modelling of the drainage system for the 1 in 30 year storm (3.3% AEP event) **+ 40%** allowance for climate change, and the 1 in 100 year storm (1% AEP event) **+ 50%** allowance for climate change.

Lead Local Flood Authority – General Advice

The Lead Local Flood Authority's general advice is provided through the Lancashire SuDS Pro-forma and accompanying guidance. All applications for major development are expected to follow this guidance and submit a completed SuDS pro-forma.

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 Lead Local Flood Authority via our identified mailbox.

If you decide to approve contrary to our advice

If the Local Planning Authority grants planning permission for this development contrary to our advice, then we will be unable to support this application in an appeal or to assist with the discharge of any planning conditions, including surface water or flood risk conditions that we have not recommended.

For the avoidance of doubt, as the Lead Local Flood Authority, we do not comment on the application of the sequential and/or exception tests.

The Local Planning Authority should be aware that any development built after 1 January 2012 is not eligible for Grant-in-Aid funding from central government to study or alleviate flood issues. This is set out in section 9.3 of the Memorandum relating to capital grants for local authorities and internal drainage boards in England.

Please send a copy of the decision notice to our identified mailbox.

Yours faithfully,

Ben Rogers

Lead Local Flood Authority