

Contact: Please contact the Local Planning Authority

Date: 16 February 2024

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:	3/2024/0042
Proposal:	Approval of details reserved by conditions 6 (road adoption), 10 (surface water drainage scheme), 11 (surface water drainage operation and maintenance) , 12 (surface water drainage verification report), 13 (details of play equipment), 14 (protected species licence), 17 (electric vehicle charging points), 18 (external levels and finished floor levels), 21 (boundary treatments) and 22 (biodiversity enhancement) of planning permission 3/2023/0100.
Location:	Land west of Preston Road Longridge PR3 3BE

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, including conditions, 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 is currently **unable to recommend the discharge of condition 10** on planning decision 3/2023/0100 on the basis of:

- The applicant has failed to provide evidence of the drainage calculations for the development, taking into account the conditioned climate change allowances as well as the urban creep allowance.

Lancashire County Council

PO Box 100, County Hall, Preston, PR1 0LD



- The applicant has failed to provide evidence of the sustainable drainage system layout showing all pipe and structure references, dimensions and design levels; to include all existing and proposed surface water drainage systems up to and including the final outfall. The adoptable drainage layout drawing fails to do this in its entirety.
- The applicant has failed to provide evidence of details of all sustainable drainage components, including landscape drawings showing topography and slope gradient as appropriate.
- The applicant has failed to provide evidence of the drainage plan showing flood water exceedance routes in accordance with Defra Technical Standards for Sustainable Drainage Systems.
- The applicant has failed to provide evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltrations rates and groundwater levels in accordance with BRE 365.
- The applicant has failed to provide evidence of an assessment of the existing on-site watercourse to be used, to confirm that these systems are in sufficient condition and have sufficient capacity to accept surface water runoff generated from the development.
- The applicant has failed to provide evidence that a free-flowing outfall can be achieved. If this is not possible, evidence of a surcharged outfall applied to the sustainable drainage calculations will be required.

The Lead Local Flood Authority is currently **unable to recommend the discharge of condition 11** on planning decision 3/2023/0100 on the basis of:

- The applicant has failed to provide information outlining the timetable for implementation for the management and maintenance of the drainage arrangements.
- The applicant has failed to provide evidence of the proposed management and maintenance company to be utilised for the attenuation basins.
- The applicant has failed to provide a pro-forma to allow the recording of each inspection and maintenance activity, as well as allowing any faults to be recorded and actions taken to rectify issues.
- The applicant has failed to provide evidence of details of financial management including arrangements for the replacement of major components at the end of the manufacturer's recommended design life.
- The applicant has failed to provide evidence of whom to contact if pollution is seen in the system or if it is not working correctly.
- The applicant has stated that the attenuation basins have been designed for the 1in100 year event with a 30% climate change allowance, which is contrary to the requirements as outlined in condition 10.

The Lead Local Flood Authority is currently **unable to recommend the discharge of condition 12** on planning decision 3/2023/0100 on the basis of:

- The applicant has failed to provide evidence that facilitates the discharge of this condition, the applicant should ensure that evidence is provided that complies with the wording of the condition, namely a verification report that, as a minimum,

demonstrates that the surface water sustainable drainage system has been constructed in accordance with the approved drawing(s) (or detail any minor variations) and is fit for purpose. The report shall contain information and evidence, including photographs, of details and locations (including national grid references) of critical drainage infrastructure (including inlets, outlets, and control structures) and full as-built drawings.

Lead Local Flood Authority - Site-Specific Advice

The following advice is provided to inform the applicant and the Local Planning Authority of our expectations:

The applicant has failed to provide evidence of an agreement in principle with a water and sewage company to demonstrate that the drainage system will be adopted by a competent undertaker.

If the applicant wishes to discuss any aspects of this response with the Lead Local Flood Authority, they can do so through our [planning advice service](#).

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.

What this response DOES NOT cover

This response does not cover highway drainage, matters pertaining to highway adoption (s38 Highways Act 1980) and/or off-site highway works (s278 Highways Act 1980). Should the applicant intend to install any sustainable drainage systems under or within close proximity to a public road network (existing or proposed), then they would need to separately discuss the use and suitability of those systems with the relevant highway authority.

The applicant is encouraged to discuss the suitability of any overland flow routes and/or flood water exceedance with the relevant highway authority should they have the potential to impact the public highway network and/or public highway drainage infrastructure (either existing or proposed).

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.

Material Changes or Additional Information to this Planning Application

If there are any material changes to the submitted information or additional information provided after this Lead Local Flood Authority response to the Local Planning Authority which impact surface water, the Local Planning Authority is advised to re-consult the Lead Local Flood Authority. Please be aware this will be classed as a re-consultation with a full 21-day response time. Re-consultations should be sent to our identified mailbox.

Please note that should the Local Planning Authority make a decision on this application contrary to our advice, then we will be unable to support this application in an appeal or at any future discharge of conditions stage relating to conditions that the Lead Local Flood Authority have not recommended.



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

Yours faithfully,

Harry McGaghey

Lead Local Flood Authority

