

**From:** Lyndsey Hayes  
**Sent:** 28 February 2024 13:44  
**To:** Lyndsey Hayes  
**Subject:** Tilia Homes response to LLFA objection  
  
**Importance:** High

**From:** [REDACTED]  
**Sent:** Monday, February 26, 2024 5:46 PM  
**To:**  
**Cc:**  
**Subject:** RE: Preston Road, Longridge  
**Importance:** High

Thank you for issuing through the LLF formal comments received on Friday 23<sup>rd</sup> February, in relation to our discharge of conditions application (Application No: 3/2020/0042). We have consulted with our engineering consultants at Lees Roxburgh and can confirm the following formal response to the comments received from LLFA as follows in **GREEN** text below, in relation to each respective condition:

**Condition 10**

- *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.*

Please see attached above the requested drainage calculation documents, which have assisted in finalising our proposed Surface Water engineering designs/strategy.

Our proposed Surface Water drainage strategy is based on the already approved site specific flood risk assessment for the development. **The Drainage Statement document (Ref: 6196/R2 Rev E)** has been specifically prepared for the Phase 3 re-plan application area only in question, which in turn referred back to the original consented FRA. The Phase 3 Drainage Statement in Section 3.1 sets out the basis for the Phase 3 drainage design update specifically noting that the overall proposals incorporate attenuation up to the 1 in 100 year plus 30% climate change event with no commitment to allowing for urban creep.

In this regard the design can only be undertaken to the same design parameters previously approved and which have informed the size of the 2 No. attenuation basins.

- *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 attached full engineering pack seeks to fully detail the Phase 3 connections to the network serving the earlier phases.

- *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 drainage drawings all covered in the attached and previously submitted in part on the original submission, cover the proposals for an onsite pipe system which comply with the original approved proposals for the overall scheme with as noted attenuation being provided in 2 No. basins.

I can only assume, although it is unclear, that the LLFA in the response are referring here to proposals for the area of the 2 No. basins, but as noted and set out within the **Drainage Statement document (Ref: 6196/R2 Rev F)** previously submitted, these basins have previously been approved and the focus of the condition discharge in place should only be focusing on the specific drainage proposals serving Phase 3.

- *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.*

Please see attached the **Drainage Proposals Plan (Ref: 6196/01-07 REV M)**, which details the requested flood water exceedance routes to the drainage proposals, which accompany the **Drainage Statement document (Ref: 6196/R2 Rev F)** submitted as part of our planning application.

- *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 **Drainage Statement document (Ref: 6196/R2 Rev F)** previously submitted as part of our planning application provides the appropriate context for the current proposals referring back to the original approved FRA within which reference was made to a Phase 2 Geo-environmental Site Assessment by Coopers which had identified that ground conditions do not favour a ground percolation based drainage solution.

This FRA, and therefore the conclusion that ground conditions were unsuitable for infiltration, was accepted as integral to the original detailed consent for the development and it is not appropriate to revisit the matter here.

- *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.*

Again, reference is made to the approved FRA which established the outfalls for the development into the existing watercourse network restricting flows to greenfield runoff rates, the detailed design of which has long since been approved by United Utilities and the LPA/LLFA. The connection from Phase 3 is being made into the existing piped drainage network and there is no impact on the proposed flow restrictions from the 2 No. basins.

- *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 hydraulic design for the revised Phase 3 layout has been run in conjunction with the overall design and the calculations need to be sent to the LLFA.

#### **Condition 11**

- *The applicant has failed to provide information outlining the timetable for implementation for the management and maintenance of the drainage arrangements.*

The already issued **Phase 3 Adoptable Drainage Plan Rev C (6196-300-03)** confirms that all proposed SW drainage will be adopted by United Utilities. The connection from Phase 3 is being made into the existing piped drainage network to the NW corner of the development.

The management and maintenance of the SW drainage system will be undertaken and maintained by UU as part of the adoption process. The SW outfall is currently build complete and upon all plots being constructed, along with the SW infrastructure within Phase 3, the drainage scheme will then seek for

adoption with United Utilities at the end phase of the build programme for the overall development. All SW drainage is to be constructed and handed over to adoptable standard to United Utilities.

- *The applicant has failed to provide evidence of the proposed management and maintenance company to be utilised for the attenuation basins.*

Tilia can confirm that all areas of the development as highlighted on the already submitted **Master Deed Plan Rev J**, will be handed over for all future maintenance under an approved Management Company agreement with Trustgreen. Currently all residents will be charged an annual fee of £193, which will cover the management fee for the scheme, upon hand over of the open space to Trustgreen. Please see attached also the document welcome pack from Trustgreen, provided to all present and future residents of our scheme. All the attenuation basins and open space located within the proposed open space areas will be managed by Trustgreen.

- *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 management and maintenance of the SW drainage system will be undertaken and maintained by UU as part of the adoption process. The adoption process will see Tilia working alongside United Utilities to undertake suitable inspections to allow formal adoption sign off of the proposed SW drainage system. The process for recording inspections/actions/faults/actions will be undertaken as part of the adoption process with United Utilities and again all proposed SW drainage is to be delivered to adoptable standards and handed over to United Utilities upon completion of the development.

- *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.*

Until the SW drainage is handed over and accepted as adoptable standards it is in the responsibility of Tilia Homes to undertake any required maintenance repairs/replacement components until adoption is approved with United Utilities. Again the proposed and finalised SW drainage scheme is to be fully adopted to United Utilities and is to be constructed and handed over to adoptable standards with United Utilities

- *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.*

Section 4.0 of the Management and Maintenance Plan sets out the individual responsibilities for the private piped drainage system, the adoptable pipe system and the attenuation basins.

- *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.*

As noted above, Condition 10 refers back to the Drainage Statement which in turn refers back to the original consented FRA which incorporated an allowance for 30% climate change.

#### **Condition 12**

- 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.

With regards to the proposed SW drainage design for Phase 3, a suitable verification report will be completed when all the drainage works have been constructed for the future development phase in question. A suitable verification report will be issued upon completion of the drainage scheme and development, but again the SW drainage scheme is to be fully constructed the adoptable standards and will be handed over to United Utilities and will undergo a full adoption process, so needing to provide a verification report in addition will be issued as requested upon completion of the SW drainage system.

I trust the above is deemed acceptable in response at this stage and the current objection can be lifted at this time. Our reengineering consultants wanted to clearly state that in some of the comments received from LLFA, reference is made to the approved FRA which established the outfalls for the development into the existing watercourse network restricting flows to greenfield runoff rates, the detailed design of which has long since been approved by United Utilities and the LPA/LLFA.

The SW connection from Phase 3 is being made into the existing piped drainage network and there is no impact on the proposed flow restrictions from the 2 No. basins that are being referred to in comments above. An assessment should only be made upon the drainage purely effecting the proposed SW design to the Phase 3 re-plan in question and not the greater scheme which has already been approved by United Utilities and the LPA/LLFA.

We are very eager to comply to the current LLFA objection immediately to address the outstanding pre-commencement Condition 10, as per our detailed urgent response above and trust the above now clarifies the outstanding matters at this time.

**Adam Dohren**  
Design & Planning Manager

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