

REFORD

Consulting Engineers Limited

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17th June 2024

John Macholc
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe BB7 2RA

Dear John

Planning reference: 3/2024/0389

Location: Land to the north of the Chapel Hill site, Longridge

Proposal: Discharge of Condition 14 (surface water drainage strategy), 15 (construction surface water management plan), 16 (surface water drainage operation and maintenance manual) and 17 (surface water verification report) on planning decision 3/2021/1262

I refer to the letter from the Lead Local Flood Authority dated 30th May 2024, in which the LLFA stated was unable to recommend the discharge of Conditions 14, 15, 16 and 17.

For Condition 14 the LLFA states the following and our responses are alongside.

The applicant has failed to provide details of all sustainable drainage components, including landscape drawings showing topography and slope gradient as appropriate.

The applicant has failed to provide a drainage plan showing flood water exceedance route in accordance with Defra Technical Standards for Sustainable Drainage Systems.

The applicant has failed to provide Finished Floor Levels (FFL) in AOD with adjacent ground levels for all sides of each building and connecting cover levels to confirm minimum 150 mm+ difference for FFL.

Response: A detail of the hydrobrake manhole is included within the report submitted to discharge the condition. A typical attenuation storage detail is attached to this letter.

Landscape drawings for the site are yet to be produced and do not have a bearing on the drainage of the developed site. A drainage plan showing the exceedance flow route through the site is attached to this letter. With regards to the adjacent ground levels for all sides of each building, cover levels are provided to the manholes adjacent to the buildings along with finished floor levels of the buildings on the drainage drawing included within the report.

For Condition 15 the LLFA states the following and our responses are alongside.

The applicant has failed to provide a site layout that demonstrates the principles outlined in the construction surface water management plan.

The applicant has failed to provide evidence of the proposed restricted discharge rate of surface water from the temporary lagoon to the existing private surface water drainage system.

The applicant has failed to provide full evidence to demonstrate that siltation and pollutants will be prevented from affecting surface water, and watercourses, apart from stating that silt will be allowed to settle in the temporary lagoon, this is important given the sites proximity to an existing pond.

Response: As already previously stated within the submitted construction management plan, the permanent drainage within the site as designed for the completed development will be constructed first and instead of being connected to an attenuation tank with an outfall, a lagoon will be constructed at the location of the attenuation tank without an outfall being constructed. A layout is attached to this letter.

As the lagoon will be the same size as the attenuation tank and at the same depth to enable the surface water drainage to discharge into it. It will therefore be able to deal with the 100 year plus climate change event. As it is the permanent drainage that is to be installed, please refer to the submitted proposed surface water drainage design where design levels, adjacent ground levels, etc. can be found. Discharges from the lagoon, when required, will be by pump at a rate not exceeding 5.6 l/s, which is the surface water design discharge rates.

Measures taken to prevent flooding and pollution of the receiving groundwater and / or surface waters, including watercourses has been appended to this letter.

For Condition 16 the LLFA states the following and our responses are alongside.

The applicant has failed to provide 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 the implementation timetable for the arrangements for the statutory undertaker to carry forward the operation of the system as well as the details of the statutory undertaker.

Response: The completed drainage within the developed site will remain the responsibility of the owner of the site and is not going to be offered to the statutory undertaker. Any repairs / replacement of major components will remain the responsibility of the owner of the site and will be financed by them.

For Condition 17 the LLFA states the following and our response is alongside.

The applicant has failed to provide evidence that complies with the wording of the condition, as well as this condition relating to the final surface water sustainable system being fully implemented and therefore being unable to consider the discharge of this condition prior to the systems construction.

Response: We agree with the LLFA in that the condition can only be discharged once the final surface water drainage system has been installed.

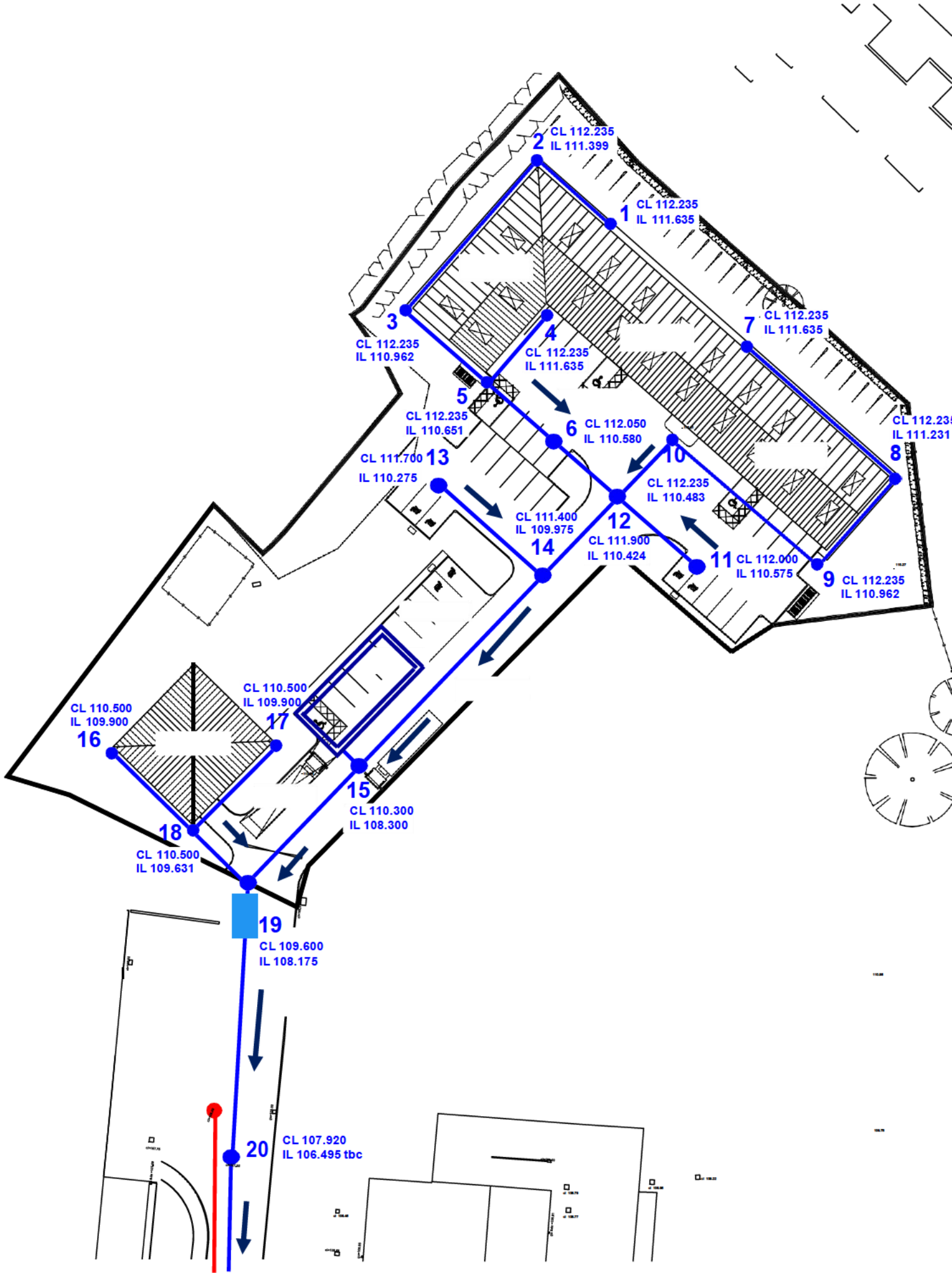
We trust the above will enable the LLFA to recommend discharge of Conditions 14, 15 and 16.

Yours sincerely,

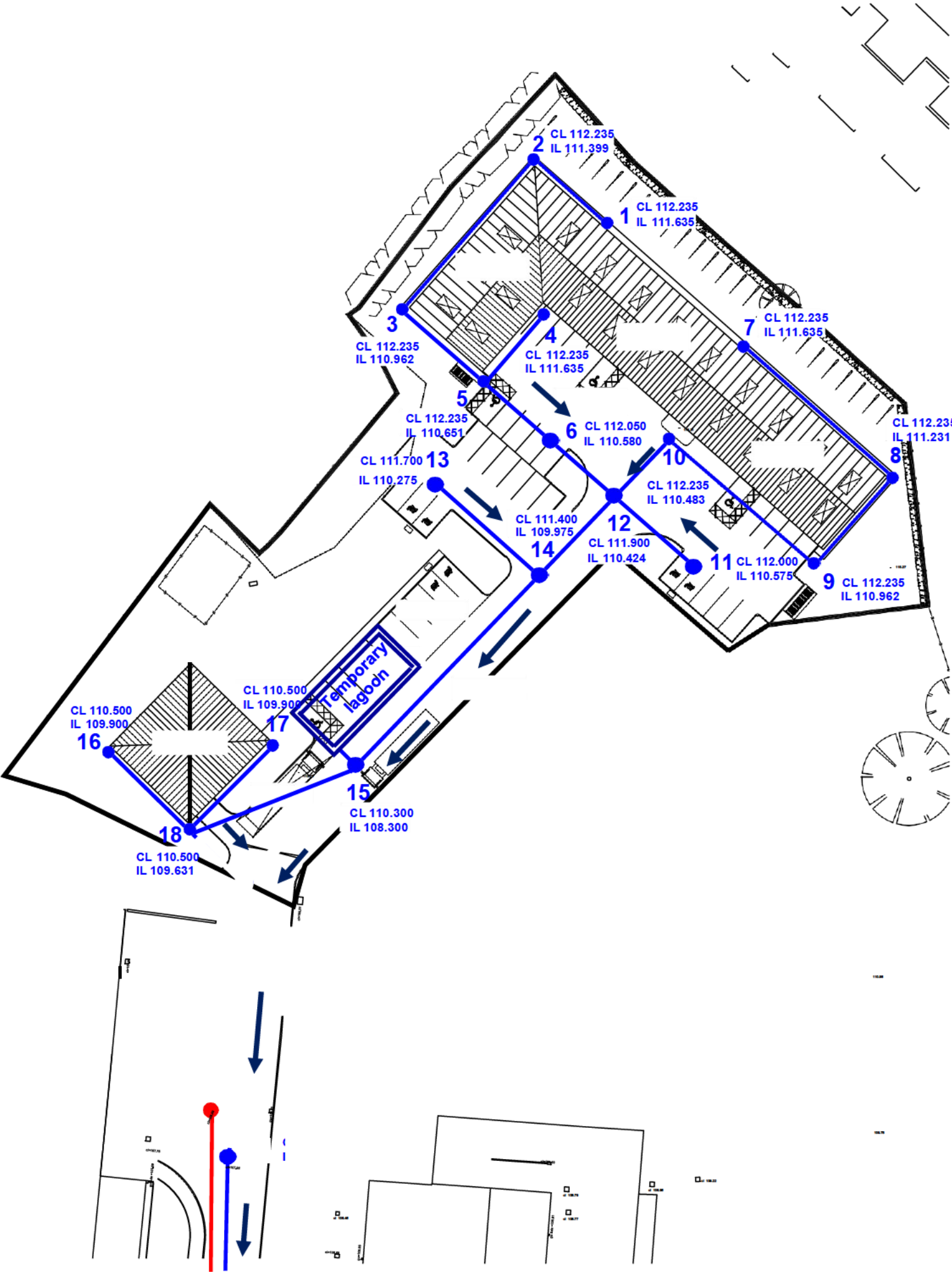
Bob Ford

**Bob Ford CEng MICE MCIHT
DIRECTOR
REFORD Consulting Engineers Limited**

EXCEEDANCE FLOW



CONSTRUCTION DRAINAGE



Measures taken to prevent flooding and pollution of the receiving groundwater and / or surface waters, including watercourses

Environmental Considerations

Pollution prevention measures will be carried out.

Machines will have all oils replaced with biodegradable mineral oil.

Machines will be washed down with clean water.

Machines will also be cleaned prior to leaving the site.

Spill kits and absorbent booms will be made available.

Ensure any fuel spills are contained with drip-trays.

Refuelling to take place at designated areas only.

Machine exhaust emissions to be controlled by proper plant maintenance.

Pollution prevention

Pollution Risk Assessment

1. Consider: what chemicals or fuel will be on site (COSHH register), what could happen if it's spilt (check MSDS sheets), drainage systems, watercourses and any protected environments on and around your site.
2. Controls: e.g. safe storage, bund fuel tanks, spill kit, toolbox talk for operatives on how to deal with a spill.
3. Pollution incident response plan – prepare, plan and practice.
4. Identify pollution pathways (watercourses, groundwater and drainage systems) that could be affected by a spill so that you can act quickly.
5. Written plan detailing what to do if a spill happens including where spill kits are located.
6. Train operatives on how to deal with a spill e.g. toolbox talk, practice run.

Pollution control hierarchy

Contain at source

Contain close to source.

Contain on the surface.

Contain in the drainage system.

Contain on or in the watercourse



(Preferred response)

(Least preferred response)

Pollution prevention equipment and emergency response

1. Close valves, taps, or lids to stop the contaminant flowing or turn over leaking drums so it can't leak out (*only if safe to do so).
2. Suitable and sufficient spill kits for chemicals and fuel you have on site to soak up a spill e.g. absorbent pads, sand, booms to prevent spread, drain mats to cover drains / manholes / sewer openings.
3. Transfer the leaking material into another, undamaged container (label appropriately).
4. *Remember their health and safety is more important than stopping a spill.
5. Safe and legal disposal of waste from a spill.

Any contaminant collected by absorbent pads, booms, sand, soil etc. and any other contaminated equipment used in the clean-up must be transferred to a safe container, labelled appropriately and disposed of legally: transferred to a registered waste carrier at a suitably licensed facility that is authorised to collect and treat that kind of waste (possibly hazardous waste). Must include a waste transfer note or a consignment note for hazardous waste, e.g. oil, solvents, acids (copies must be kept for 2 years, 3 years for hazardous waste).