

Contact: Please contact the Local Planning Authority

Date: 03 June 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:	3/2024/0397
Proposal:	Approval of details reserved by conditions 14 (foul and SW drainage), 16 (SW sustainable drainage strategy), 17 (construction SW management plan), 18 (operation and maintenance manual) and 20 (compensatory flood storage) from planning permission 3/2021/0731.
Location:	St James C of E Primary School Greenacre Street Clitheroe BB7 1ED

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 16** on planning decision 3/2021/0731 on the basis of:

- The applicant has failed to provide evidence of an allowance for urban creep applied to the development. The applicant has stated that as the site is not residential then it is not required, however an urban creep allowance is to take into consideration the change in impermeable over time regardless of the time of development (such as paved areas or extending the playground), as long as the

Lancashire County Council

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development is not already 100% impermeable or planning permission would be required to make the proposed changes.

The Lead Local Flood Authority is able to **recommend the discharge of condition 17** on planning decision 3/2021/0731.

The Lead Local Flood Authority is able to **recommend the discharge of condition 18** on planning decision 3/2021/0731.

Lead Local Flood Authority - Site-Specific Advice

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

Historically, minimum discharge rates have been limited to 5l/s due to the risk of blockage of outlets with an orifice size of smaller than 50mm. However, using appropriate drainage and sufficient upstream treatment orifice sizes can be made smaller with discharge rates being limited far below 5l/s without causing an unacceptable risk of blockage. Features such as permeable paving, trash screens, catchpit manholes and vortex flow control devices are example of SuDS components that are proficient in reducing the risk of blockages. As the Design and Construction Guidance allows adoption down to a 50mm orifice, it is now generally felt that 2 l/s (which can be achieved with a vortex control regulator), is an appropriate target for the minimum flow rate. This should lead to appropriate selection of SuDS design which minimises the amount of solids (debris and sediment) in the flow.

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

