

Technical Note

Project: The Eagle at Barrow, Clitheroe

Subject: LLFA Objection Response

Client:	Fence Gate Limited		
Project No:	08336	Version:	A
Document Ref:	08336-TN-02	Author:	Andrea Nelmes
Date:	10/07/2026	Approved:	Alison Caldwell

I Introduction

- 1.1.1 PJA on behalf of Fence Gate Limited, previously prepared a Surface Water and Foul Water Drainage Technical Note (Version B, dated February 2025) in support of a full planning application (Ribble Valley Borough Council ref. 3/2025/0100) for a two-storey, 38 bedroom hotel located on the car park of the existing pub 'The Eagle at Barrow', Clitheroe. Herein referred to as 'the Site'.
- 1.1.2 This Technical Note has been prepared in response to the comments raised by Lancashire County Council, in its capacity as the Lead Local Flood Authority (LLFA), within its consultation response dated 20 October 2025, reproduced in Appendix A. The purpose of this document is to provide additional technical justification and clarification in respect of the proposed drainage strategy and address each of the matters raised by the LLFA.

2 LLFA Objection & Response

- 2.1.1 The following sections respond to each of the matters raised by the LLFA. As demonstrated below, the proposed drainage strategy has been developed following a detailed appraisal of the site constraints and available discharge options. The use of a pumped surface water drainage system has been adopted only after alternative gravity drainage solutions were considered and discounted as not representing the most sustainable or reasonably practicable drainage solution, consistent with the requirements of Standard S12 of the Defra Technical Standards for Sustainable Drainage Systems.

2.2 **Objection I – Inadequate Surface Water Sustainable Drainage Strategy**

- 2.2.1 The LLFA has objected to the proposed surface water drainage strategy on the basis that insufficient evidence has been provided to demonstrate why pumping is required to drain the Site, in accordance with Standard S12 of the *Defra Non Statutory Technical Standards for Sustainable Drainage Systems*. Specifically, the LLFA considers that the submitted information does not adequately demonstrate why drainage by gravity is not reasonably practicable.

2.3 **Response**

The proposed surface water drainage strategy has been developed having regard to the drainage hierarchy contained within both the CIRIA SuDS Manual (C753) and the National Standards for Sustainable Drainage Systems (June 2025). In particular, Standard 1 (Runoff Destinations) establishes the hierarchy of acceptable discharge destinations, reproduced below.

Standard 1: Runoff Destinations

- 2.3.1 (1.1) A 'SuDS approach' shall be adopted to address the management of surface water by the development and where it should be discharged. Runoff shall be treated as a resource and managed in a way that avoids negative impacts of the development on flood risk, the morphology and water quality of receiving waters and the associated ecology.
- 2.3.2 (1.2) Runoff from the development shall be discharged to the following final destinations, to the maximum extent practicable, in accordance with the below hierarchy:
- 1 Priority 1: collected for non-potable use
 - 2 Priority 2: infiltrated to ground
 - 3 Priority 3: discharged to an above ground surface water body
 - 4 Priority 4: discharged to a surface water sewer, or another piped surface water drainage system
 - 5 Priority 5: discharged to a combined sewer

Note 1: priority 1 is the highest priority and priority 5 is the lowest.

Note 2: for the purposes of this standard, a combined sewer is a sewer intended to receive both foul sewage and surface runoff and does not include a sewer intended to receive only foul sewage, even if it has the capacity to accommodate additional flows or has an element of surface water in it already.

(1.3) To utilise a lesser priority final destination, appropriate evidence shall be provided that demonstrates all higher priority final destinations have been utilised to the maximum extent practicable. Higher cost alone shall not be a reason to utilise lower priority final destinations.

(1.4) Where more than one final destination is utilised, each final destination's ability to accept runoff shall be maximised in order of priority.

Proposed Surface Water Drainage Strategy

2.3.3 In accordance with Standard 1, the proposed drainage strategy discharges attenuated surface water runoff to the adjacent ordinary watercourse (Priority 3) via a pumped rising main, rather than by gravity to the existing 150 mm diameter United Utilities combined sewer (Priority 5), as illustrated on Figure 1 and Appendix B. Accordingly, the proposed strategy achieves a significantly higher priority runoff destination than the only available gravity alternative.

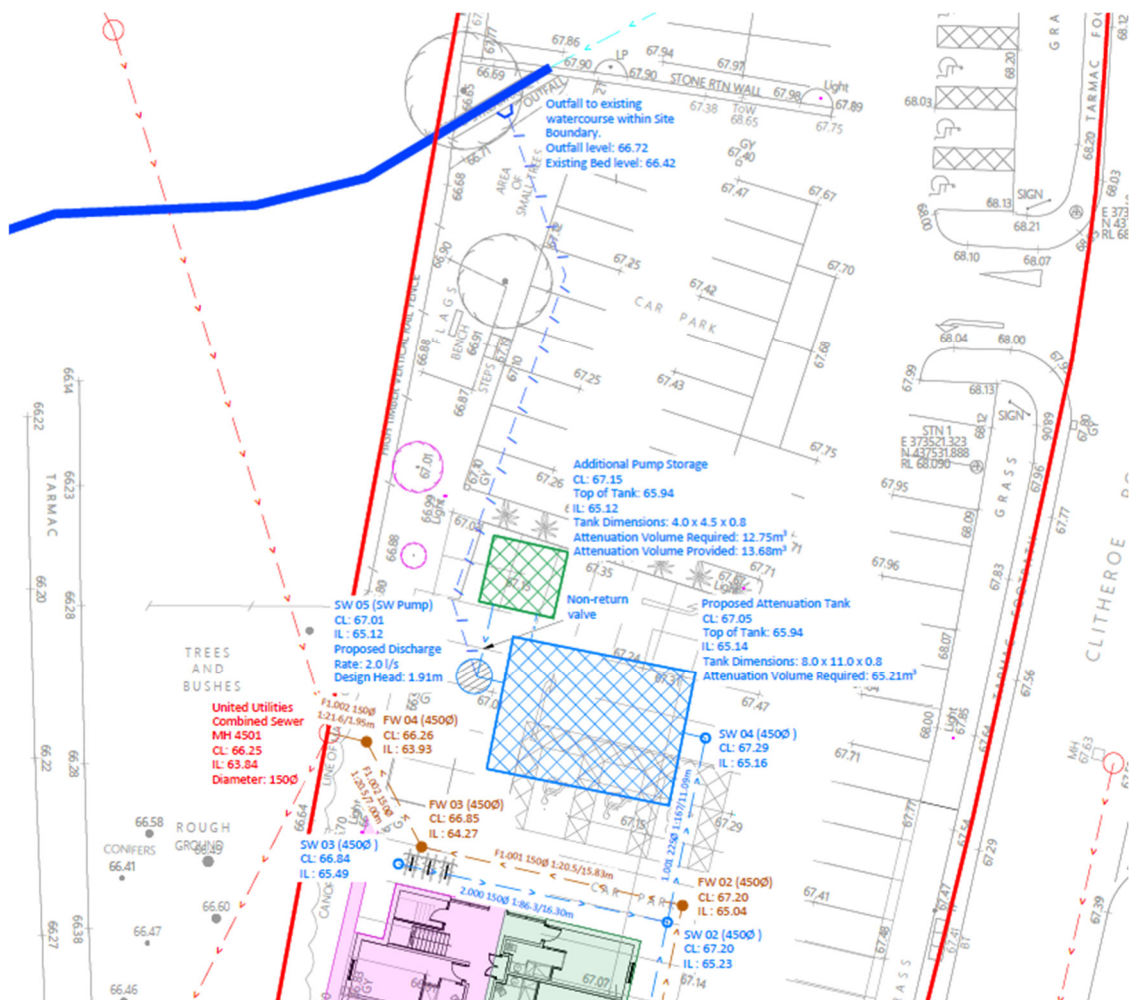


Figure 1: Excerpt from Indicative Foul & Surface Water Layout Dwg No. 08336-WR-0500

- 2.3.4 The LLFA's reference to Paragraphs 181 and 182 of the National Planning Policy Framework, requiring sustainable drainage systems to have appropriate minimum operational standards, is acknowledged. However, the operational resilience of the proposed pumped drainage system should be considered alongside the alternative gravity discharge to the existing public combined sewer. Whilst the use of pumps introduces a mechanical component requiring ongoing maintenance, the proposed drainage strategy has been designed to ensure that, in the unlikely event of pump failure, surface water can be safely contained on site. In addition to the required attenuation storage of 65.21m³, the system incorporates a further 125m³ of emergency storage, providing a total storage volume of approximately 190m³—almost three times the attenuation volume required. This additional storage provides sufficient resilience to accommodate a temporary pump outage, allowing time for inspection, maintenance and emergency response without resulting in off-site flooding.
- 2.3.5 By comparison, directing surface water runoff by gravity to the existing 150 mm diameter public combined sewer (refer to Appendix C for asset mapping) would unnecessarily introduce additional hydraulic loading to existing combined sewer infrastructure during rainfall events and, during periods of network exceedance, has the potential to increase the frequency and/or volume of Combined Sewer Overflow (CSO) operation together with the associated risk of sewer surcharge.
- 2.3.6 Although such a solution may be physically achievable, it represents the lowest priority runoff destination within Standard 1 of the National SuDS Standards and has the potential to increase the volume and frequency of Combined Sewer Overflows (CSOs) and the risk of sewer surcharge during periods of intense rainfall. Any resulting flooding from the public sewer network would also present a significantly greater environmental and public health risk owing to the potential presence of foul sewage, whereas the consequence of a temporary pump failure would be limited to the controlled storage of clean surface water within the site's designated low point.
- 2.3.7 The relative resilience and potential consequences associated with each drainage option are summarised in Table 1 below.

Table 1: Comparison - Consequence of Failure

Pumped Discharge to Watercourse	Gravity Discharge to Combined Sewer
Low probability of pump failure	Hydraulic performance dependent on available downstream sewer capacity
Additional emergency storage provided	No additional resilience provided
Clean surface water flooding contained within Site's low point	Potential foul flooding and pollution
Temporary storage of clean surface water	Risk of foul sewer surcharge
No increase in CSO operation	Potential increase in CSO frequency and/or volume

- 2.3.8 This approach is also supported by United Utilities. As part of the pre-development enquiry (Reference 06662810-PDE, dated 25 November 2024), United Utilities confirmed that it would expect surface water runoff to be pumped to the adjacent watercourse. Only where this preferred option had been exhausted did United Utilities advise that it would have no objection, in principle, to a restricted discharge of 2.0 l/s to the public combined sewer. The proposed drainage strategy therefore accords with the expectations of the statutory sewerage undertaker and reflects the discharge hierarchy established by the National SuDS Standards.

3 Conclusion

- 3.1.1 When considered against the National SuDS Standards as a whole, the proposed pumped discharge represents the most sustainable drainage solution for the Site. Although gravity drainage to the public combined sewer may be physically possible, it would require discharge to the lowest priority runoff destination within the drainage hierarchy and would unnecessarily increase hydraulic loading on the existing combined sewer network, with the potential to increase the frequency and/or duration of Combined Sewer Overflow (CSO) operation during periods of intense rainfall.
- 3.1.2 Conversely, the proposed pumped discharge enables attenuated surface water runoff to be discharged to the preferred receiving watercourse whilst incorporating substantial emergency storage to mitigate the unlikely event of pump failure. Accordingly, whilst a gravity connection is technically achievable, it is not considered to represent the most sustainable or reasonably practicable drainage solution for the Site. The proposed pumping arrangement is therefore fully justified and accords with both Standard S12 and the wider objectives of the National SuDS Standards.

Appendix A LLFA Letter of Objection (dated 20th October 2025)

Contact: Please contact the Local Planning Authority

Date: 20 October 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:	3/2025/0100
Proposal:	Proposed hotel development comprising two-storey building (use class C1) with associated parking and landscaping, bin store, air conditioning units and new pedestrian access.
Location:	Land at The Eagle at Barrow Clitheroe Road Whalley BB7 9AQ

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 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.

Lancashire County Council

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



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:

1. **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:

New Standards for Sustainable Drainage Systems

We note that the principle of development was agreed prior to the new Standards for Sustainable Drainage Systems which were published on the 19 June 2025. Whilst the development proposed by the applicant was considered appropriate at the time, the applicant is encouraged to apply the new Standards to the design of the development, wherever possible.

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.

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.

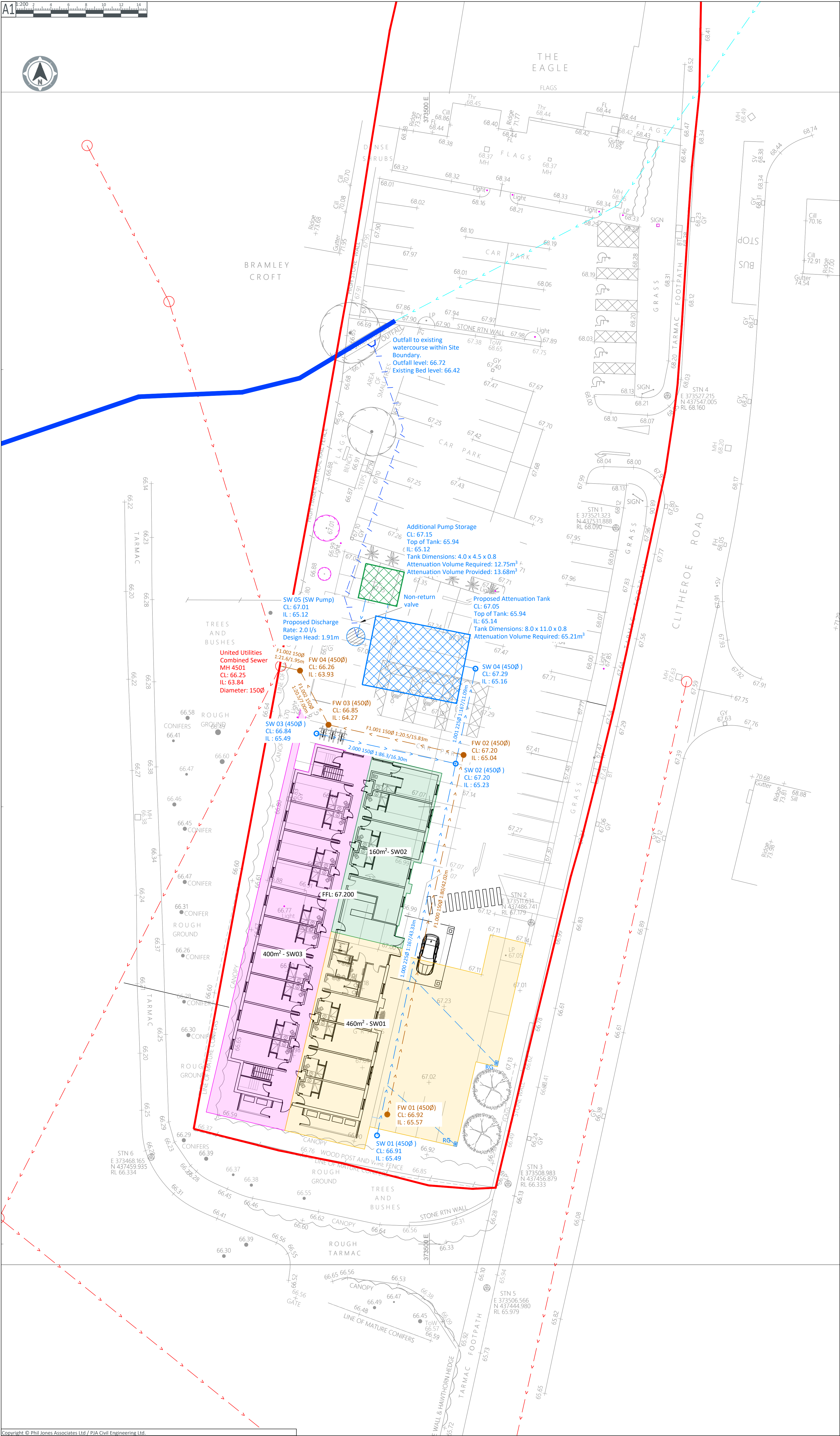
Yours faithfully,

Harry McGaghey

Lead Local Flood Authority



Appendix B Proposed Surface & Foul Drainage Strategy



- CDM Note
- These drawings have been produced with reference to the CDM Regulations 2015. Please note that these are pre-construction phase drawings and should be subject to further design risk management as required in accordance with Regulation 9.
- This Drawing is not to be reproduced in any part or form without the consent of PJA Civil Engineering Ltd. All copyright reserved.
 - No assessment of earthworks has been undertaken at this stage.
 - The site may be subject to ground re-profiling, to be reviewed at a later design stage.
 - No considerations of utilities or ecology has been undertaken at this stage.
 - Drawing should be read in conjunction with all other relevant scheme drawings.
 - Drawing Includes:
 - Site Layout provided by Frank Belshaw Building Surveyors in November 2024.
 - Topographic survey provided by Frank Belshaw Building Surveyors May 2023.
 - Location of United Utilities Combined Water Manhole based on United Utilities Sewer Records dated August 2024.
 - Surface Water Drainage Strategy based on:
 - Assumed 100% impermeable area for additional proposed building, parking and footways
 - Existing impermeable area of parking areas to be retained excluded from calculations
 - FEH 22 Rainfall Data and CV value of 1.0.
 - Discharge limited to 2.0 l/s for all events up to and including the 1 in 100 year plus 50% climate change event.
 - Foul Water Drainage Layout Design based on:
 - 38 Room Hotel with no on-site dining/conference room facilities.
 - Additional pump storage provided in a separate attenuation tank in accordance with Design and Construction Guidance (125m³ of storage to be provided per 1 ha of impermeable area).
 - The exact location, depth and condition of all sewers is to be confirmed via survey prior to detailed design.
 - Geocellular attenuation tanks proposed beneath trafficked areas with cover depths of less than 1.2 m shall be specified in accordance with the manufacturer's recommendations for the proposed cover depth and traffic loading (including HGV loading where applicable). Additional structural assessment and/or protective measures shall be provided where required to demonstrate compliance.
 - Drainage Strategy subject to review and approval by the LLFA and United Utilities
- Key:
- Site Boundary
 - Proposed Foul Water Sewer
 - Proposed Surface Water Sewer
 - Proposed Attenuation Tank
 - Additional Pump Storage Attenuation Tank
 - Private Package Pumping Station
 - Proposed Gully
 - Proposed Headwall
 - Proposed Foul Manhole
 - Proposed Surface Water Manhole
 - Existing Watercourse
 - Private Surface Water Sewer
 - United Utilities Combined Water Sewer
 - Catchment A- 400m2
 - Catchment B- 160m2
 - Catchment C- 460m2

Rev	Date	Revision Note	Drw	Chk	App
P3	09/07/2026	Updated Drawing Information	BHO	AN	AN
P2	11/01/2025	Revised Key	CT	KW	KW
P1	07/01/25	Updated site plan & Drainage Strategy	AB	KW	KW
P0	12/11/24	FIRST ISSUE	GC	KW	KW

PJA

transport • engineering • placemaking

Birmingham | Bristol | Cambridge | London | Manchester | Reading
Melbourne | Perth
pja.co.uk | pja.com.au

Client

Mr. K. Berkins

Project

The Eagle at Barrow
Clitheroe Road, Clitheroe

Title

Indicative
Foul & Surface Water
Drainage Layout

Drawing Issue Status
For Planning

PJA Ref 08336	Scale @ A1 1:200	Date July 2026
Drawing No. 08336-WR-0500		Revision P3
Primary Contact andrea.nelmes@pja.co.uk		

Appendix C United Utilities Asset Mapping

PJA Ltd

Park Point
High Street, WSP UK Ltd
Birmingham, The Mailbox
B31 2UQ

FAO:

How to contact us:

**United Utilities Water Limited
Property Searches
Haweswater House
Lingley Mere Business Park
Great Sankey
Warrington
WA5 3LP**

Telephone: 0370 7510101

E-mail: propertysearches@uuplc.co.uk

**Your Ref: 08336 Eagle at the Barrow
Our Ref: UUPS-ORD-595526
Date: 28/08/2024**

Dear Sirs

Location: THE EAGLE AT BARROW CLITHEROE ROAD, BARROW, CLITHEROE, BB7 9AQ

I acknowledge with thanks your request dated 20/08/2024 for information on the location of our services.

Please find enclosed plans showing the approximate position of United Utilities' apparatus known to be in the vicinity of this site.

The enclosed plans are being provided to you subject to the United Utilities terms and conditions for both the wastewater and water distribution plans which are shown attached.

If you are planning works anywhere in the North West, please read United Utilities' access statement before you start work to check how it will affect our network. <http://www.unitedutilities.com/work-near-asset.aspx>.

I trust the above meets with your requirements and look forward to hearing from you should you need anything further.

If you have any queries regarding this matter please [contact us](#).

Yours Faithfully,



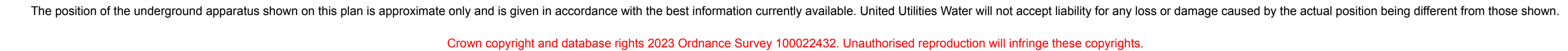
Karen McCormack
Property Searches Manager

TERMS AND CONDITIONS - WASTEWATER AND WATER DISTRIBUTION PLANS

These provisions apply to the public sewerage, water distribution and telemetry systems (including sewers which are the subject of an agreement under Section 104 of the Water Industry Act 1991 and mains installed in accordance with the agreement for the self construction of water mains) (UUWL apparatus) of United Utilities Water Limited "(UUWL)".

TERMS AND CONDITIONS:

- This Map and any information supplied with it is issued subject to the provisions contained below, to the exclusion of all others and no party relies upon any representation, warranty, collateral contract or other assurance of any person (whether party to this agreement or not) that is not set out in this agreement or the documents referred to in it.
- This Map and any information supplied with it is provided for general guidance only and no representation, undertaking or warranty as to its accuracy, completeness or being up to date is given or implied.
- In particular, the position and depth of any UUWL apparatus shown on the Map are approximate only. UUWL strongly recommends that a comprehensive survey is undertaken in addition to reviewing this Map to determine and ensure the precise location of any UUWL apparatus. The exact location, positions and depths should be obtained by excavation trial holes.
- The location and position of private drains, private sewers and service pipes to properties are not normally shown on this Map but their presence must be anticipated and accounted for and you are strongly advised to carry out your own further enquiries and investigations in order to locate the same.
- The position and depth of UUWL apparatus is subject to change and therefore this Map is issued subject to any removal or change in location of the same. The onus is entirely upon you to confirm whether any changes to the Map have been made subsequent to issue and prior to any works being carried out.
- This Map and any information shown on it or provided with it must not be relied upon in the event of any development, construction or other works (including but not limited to any excavations) in the vicinity of UUWL apparatus or for the purpose of determining the suitability of a point of connection to the sewerage or other distribution systems.
- No person or legal entity, including any company shall be relieved from any liability howsoever and whensoever arising for any damage caused to UUWL apparatus by reason of the actual position and/or depths of UUWL apparatus being different from those shown on the Map and any information supplied with it.
- If any provision contained herein is or becomes legally invalid or unenforceable, it will be taken to be severed from the remaining provisions which shall be unaffected and continue in full force and affect.
- This agreement shall be governed by English law and all parties submit to the exclusive jurisdiction of the English courts, save that nothing will prevent UUWL from bringing proceedings in any other competent jurisdiction, whether concurrently or otherwise.



Abandoned Foul Surface Water Combined

Public Sewer

Private Sewer

Section 104

Rising Main

Sludge Main

Overflow

Water Course

Highway Drain

All point assets follow the standard colour convention:

red	- combined	blue	- surface water
brown	- foul	purple	- overflow

- Manhole
- Head of System
- Extent of Survey
- Rodding Eye
- Inlet
- Discharge Point
- Vortex
- Penstock
- Washout Chamber
- Valve
- Air Valve
- Non Return Valve
- Soakaway
- Gully
- Cascade
- Flow Meter
- Hatch Box
- Oil Interceptor
- Summit
- Drop Shaft
- Orifice Plate
- Side Entry Manhole
- Outfall
- Screen Chamber
- Inspection Chamber
- Bifurcation Chamber
- Lamp Hole
- T Junction / Saddle
- Catchpit
- Valve Chamber
- Vent Column
- Vortex Chamber
- Penstock Chamber
- Network Storage Tank
- Sewer Overflow
- Ww Treatment Works
- Ww Pumping Station
- Septic Tank
- Control Kiosk
- DNM Network Monitoring Point
- Change of Characteristic

FO	Foul
SW	Surface Water
CO	Combined
OV	Overflow

CI	Circular	TR	Trapezoidal
EG	Egg	AR	Arch
OV	Oval	BA	Barrel
FT	Flat Top	HO	HorseShoe
RE	Rectangular	UN	Unspecified
SQ	Square		

AC	Asbestos Cement
BR	Brick
PE	Polyethylene
RP	Reinforced Plastic Matrix
CO	Concrete
CSB	Concrete Segment Bolted
CSU	Concrete Segment Unbolted
CC	Concrete Box Culverted
PSC	Plastic / Steel Composite
GRC	Glass Reinforced Plastic
DI	Ductile Iron
PVC	Polyvinyl Chloride
CI	Cast Iron
SI	Spun Iron
ST	Steel
VC	Vitrified Clay
PP	Polypropylene
PF	Pitch Fibre
MAC	Masonry, Coursed
MAR	Masonry, Random
U	Unspecified

THE EAGLE AT BARROW CLITHEROE ROAD,
BARROW,
CLITHEROE,
BB7 9AQ

Printed by: Property Searches



United Utilities
Water for the North West