

**Contact:** Please contact the Local  
Planning Authority

**Date:** 02 December 2025

Dear Local Planning Authority,

Thank you for inviting the Lead Local Flood Authority to comment on the below application.

**PLANNING APPLICATION CONSULTATION RESPONSE**

<b>Application Number:</b>	3/2025/0141
<b>Proposal:</b>	Regularisation of erection of three commercial buildings (10 commercial units Use Class E) and associated works.
<b>Location:</b>	Bolton Fold Farm Alston Lane Longridge PR3 3BN

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 has **no objection** to the above application subject to the inclusion of the following conditions, in consultation with the Lead Local Flood Authority:

**Condition 1 – Final Surface Water Sustainable Drainage Strategy to be submitted**

No development shall commence in any phase until a detailed, final surface water sustainable drainage strategy for the site has been submitted to, and approved in writing by, the Local Planning Authority.

The detailed surface water sustainable drainage strategy shall be based upon the indicative surface water sustainable drainage strategy submitted and sustainable

**Lancashire County Council**

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



drainage principles and requirements set out in the National Planning Policy Framework, Planning Practice Guidance and Defra Technical Standards for Sustainable Drainage Systems. No surface water shall be allowed to discharge to the public foul sewer(s), directly or indirectly.

The details of the drainage strategy to be submitted for approval shall include, as a minimum;

- a) Sustainable drainage calculations for peak flow control and volume control for the:
  - i. 100% (1 in 1-year) annual exceedance probability event;
  - ii. 3.3% (1 in 30-year) annual exceedance probability event + 40% climate change allowance, with an allowance for urban creep;
  - iii. 1% (1 in 100-year) annual exceedance probability event + 50% climate change allowance, with an allowance for urban creep

Calculations must be provided for the whole site, including all existing and proposed surface water drainage systems.

- b) Final sustainable drainage plans appropriately labelled to include, as a minimum:
  - i. Site plan showing all permeable and impermeable areas that contribute to the drainage network either directly or indirectly, including surface water flows from outside the curtilage as necessary;
  - ii. 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;
  - iii. Details of all sustainable drainage components, including landscape drawings showing topography and slope gradient as appropriate;
  - iv. Drainage plan showing flood water exceedance routes in accordance with Defra Technical Standards for Sustainable Drainage Systems;
  - v. 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;
  - vi. Details of proposals to collect and mitigate surface water runoff from the development boundary;
  - vii. Measures taken to manage the quality of the surface water runoff to prevent pollution, protect groundwater and surface waters, and deliver suitably clean water to sustainable drainage components;
- c) Evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltration rates and groundwater levels in accordance with BRE 365.
- d) 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.
- e) 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 sustainable drainage strategy shall be implemented in accordance with the approved details.

### **Reason**

To ensure satisfactory sustainable drainage facilities are provided to serve the site in accordance with Paragraphs 181 and 182 of the National Planning Policy Framework, Planning Practice Guidance and Defra Technical Standards for Sustainable Drainage Systems.

### **Condition 2 – Construction Surface Water Management Plan**

No development shall commence until a Construction Surface Water Management Plan, detailing how surface water and stormwater will be managed on the site during construction, including demolition and site clearance operations, has been submitted to and approved in writing by the Local Planning Authority.

The details of the plan to be submitted for approval shall include method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include for each phase, as a minimum:

- a) Measures taken to ensure surface water flows are retained on-site during the construction phase(s), including temporary drainage systems, and, if surface water flows are to be discharged, they are done so at a restricted rate that must not exceed the equivalent greenfield runoff rate from the site.
- b) Measures taken to prevent siltation and pollutants from the site entering any receiving groundwater and/or surface waters, including watercourses, with reference to published guidance.

The plan shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction.

### **Reasons**

To ensure the development is served by satisfactory arrangements for the disposal of surface water during each construction phase(s) so it does not pose an undue surface water flood risk on-site or elsewhere during any construction phase in accordance with Paragraph 181 of the National Planning Policy Framework.

### **Condition 3 – Sustainable Drainage System Operation and Maintenance Manual**

The commencement of use of the development shall not be permitted until a site-specific Operation and Maintenance Manual for the lifetime of the development, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved in writing by the Local Planning Authority.

The details of the manual to be submitted for approval shall include, as a minimum:

- a) A timetable for its implementation;
- b) Details of the maintenance, operational and access requirement for all SuDS components and connecting drainage structures, including all watercourses and their ownership;



- c) 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;
- d) The arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme in perpetuity;
- e) Details of financial management including arrangements for the replacement of major components at the end of the manufacturer's recommended design life;
- f) Details of whom to contact if pollution is seen in the system or if it is not working correctly; and
- g) Means of access for maintenance and easements.

Thereafter the drainage system shall be retained, managed, and maintained in accordance with the approved details.

### **Reason**

To ensure that surface water flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property, and ecological systems, and to ensure that the sustainable drainage system is subsequently maintained pursuant to the requirements of Paragraph 182 of the National Planning Policy Framework.

### **Condition 4 – Verification Report of Constructed Sustainable Drainage System**

The commencement of use of the development shall not be permitted until a site-specific verification report, pertaining to the surface water sustainable drainage system, and prepared by a suitably competent person, has been submitted to and approved in writing by the Local Planning Authority.

The verification report must, as a minimum, demonstrate 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. The scheme shall thereafter be maintained in perpetuity.

### **Reason**

To ensure that surface water flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property, and ecological systems, and to ensure that the development as constructed is compliant with the requirements of Paragraphs 181 and 182 of the National Planning Policy Framework.



## **Informatives**

### **Informative 01 – Ordinary Watercourse Consent**

Under Section 23 of the Land Drainage Act 1991, as amended by the Flood and Water Management Act 2010, there is a legal requirement to obtain consent from Lancashire County Council, as Lead Local Flood Authority, prior to undertaking certain works on ordinary watercourses. This includes permanent and/or temporary works and may also include repairs to certain existing structures and maintenance works. Consent is required irrespective of whether the watercourse is open or culverted (piped or otherwise enclosed) and notwithstanding of any planning permission.

- **In line with Lancashire County Council's Ordinary Watercourse Regulation Policies, applicants should avoid crossing, diverting and/or culverting an ordinary watercourse.**
- **Written consent must be obtained before starting works on site. There is no legal means for Lancashire County Council to issue retrospective consent.**
- **It is an offence to carry out works under Section 23 of the Land Drainage Act 1991 (as amended) without the appropriate consent. Unconsented works may be subject to enforcement action under Section 24 of the Land Drainage Act 1991 (as amended).**
- **Consent applications take up to 2 months to process from the date on which the application is valid and payment of the correct fee has been received in full.**
- **Consent applications may be refused if there is insufficient evidence to demonstrate compliance with Lancashire County Council's Ordinary Watercourse Regulation Policies.**
- **If the works include adoption of a new asset, such as a road or sewer, then applications for adoption may be refused by the adopting body without the appropriate consent for works to the ordinary watercourse.**
- **Sites may be inspected before, during and after the issuing of consent.**

Once planning permission has been obtained it **does not** mean that Ordinary Watercourse Consent will be given. It is strongly advised that you obtain any required consent before or concurrently as you apply for planning permission to avoid delays.

Lancashire County Council's ordinary watercourse regulation policies, guidance, application validation checklist and pro-forma can be found at:

<https://www.lancashire.gov.uk/flooding/ordinary-watercourse-regulation/>

### **Informative 02 – Appropriate Legal Agreement**

The proposed outfall may require a legal agreement with a third party to access and construct the outfall in addition to any permission(s) from flood risk management authorities. Evidence of an in-principle agreement(s) should be submitted to the Local Planning Authority.



### **Lead Local Flood Authority - Site-Specific Advice**

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

Although the applicant has provided some information as specified in the wording of the condition, the applicant has failed to provide full and detailed information that would be expected at the detailed design stage to ensure that the proposed surface water sustainable drainage system has been designed appropriately. For example, the applicant has failed to take into account the advice provided in our previous response, evidence of an urban creep allowance applied or detailed design evidence of the proposed SuDS Pond and its dimensions, including levels etc or that it has been included in the contributing area plan.

The statement that the watercourse will be taking runoff at a greenfield runoff rate of 2.8l/s is not in itself a demonstration that the proposed watercourse has the sufficient capacity or in sufficient condition to accept flows.

For the avoidance of doubt the Lead Local Flood Authority make note to the Local Planning Authority that it is unclear if the proposed surface water sustainable drainage system has been built, given that this is a retrospective planning permission as the buildings have already been constructed, if it is apparent that the drainage system has not been constructed yet as proposed, then the applicant should be expected to provide evidence of how the constructed site is currently being drained to ensure that it is not causing a flood risk or having a pollution impact on the watercourse.

### **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.

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).

**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

