

Contact: Please contact the Local
Planning Authority

Date: 21 August 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:	3/2025/0489
Proposal:	Proposed extension to manufacturing facility with associated HV Substation, external plant compound and new/displaced car park.
Location:	BAE Systems Samlesbury Aerodrome Myerscough Smithy Road Balderstone BB2 7LF

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 appropriate minimum operation standards for peak flow control**, in line with the Defra Technical Standards for Sustainable Drainage Systems, therefore, is contrary to paragraph 169 of the National Planning Policy Framework.

Standards S2 and S3 of the Defra Technical Standards for Sustainable Drainage Systems require applicants to demonstrate that post-development peak flows of any proposed development do not exceed existing pre-development surface water runoff rates for the 100% (1 in 1-year) and 1% (1 in 100-year) annual exceedance probability rainfall event.

The submitted surface water sustainable drainage strategy fails to contain peak flows within these parameters. This is because there is insufficient evidence to demonstrate that the peak runoff rate from the development to the for the 100% (1 in 1-year) annual exceedance probability rainfall event will not exceed the rate of discharge from the development before redevelopment for the same event.

For the avoidance of doubt, the methodology used to estimate the existing pre-development run off rates is considered to be inadequate as it fails to follow the methodology set out in section 24.5 of The SuDS Manual (C753).

The applicant is expected to provide evidence to comply with either point 1, 2a or 2b of Section 24.5 of The SuDS Manual. The applicant should provide evidence of the existing site drainage system and a simulation model, to demonstrate the predevelopment runoff rate and discharge volumes or evidence of greenfield estimations.

Therefore, the proposals are contrary to Standard S3 of the Defra Technical Standards for Sustainable Drainage Systems. This is sufficient reason in itself for a refusal of planning permission.



2. **Provide appropriate minimum operational standards for volume control**, in line with the Defra Technical Standards for Sustainable Drainage Systems, therefore, is contrary to paragraph 169 of the National Planning Policy Framework.

Standard S5 of the DEFRA Technical Standards for Sustainable Drainage Systems requires the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event must be constrained to a value as close as is reasonably practicable to the greenfield runoff volume for the same event, but should never exceed the runoff volume from the development site prior to redevelopment for that event.

S6 of the Defra Technical Standards for Sustainable Drainage Systems requires where it is not reasonably practicable to constrain the volume of runoff to any drain, sewer or surface water body in accordance with S4 or S5 above, the runoff volume must be discharged at a rate that does not adversely affect flood risk.

For the avoidance of doubt, the methodology used to estimate the existing pre-development run off rates is considered to be inadequate as it fails to follow the methodology set out in section 24.5 of The SuDS Manual (C753), which therefore means that the calculated required post development storage volume is inadequate.

The applicant is expected to provide evidence to comply with either point 1, 2a or 2b of Section 24.5 of The SuDS Manual. The applicant should provide evidence of the existing site drainage system and a simulation model, to demonstrate the predevelopment runoff rate and discharge volumes or evidence of greenfield estimations.

The applicant has provided inadequate evidence of the existing or proposed run off volume for the 100 year 6 hour rainfall event. In the absence of this information the Lead Local Flood Authority cannot assess whether the development proposed meets the requirements of Paragraph 169 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.

3. **Incorporate an appropriate multifunctional surface water sustainable drainage system**, contrary to paragraphs 181 and 182 of the National Planning Policy Framework.

Sustainable drainage systems are defined by Annex 2 (Glossary) from the National Planning Policy framework as a system that "...controls surface water run off close to where it falls, combining a mixture of built and nature-based techniques to mimic natural drainage as closely as possible, and accounting for the predicted impacts of climate change". Paragraph 182 of the National Planning Policy Framework makes clear that they should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity.



Failure to incorporate an appropriate multifunctional sustainable surface water drainage system, or provide clear evidence that this would be inappropriate, is considered contrary to paragraphs 181 and 182 of the National Planning Policy Framework. 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:

For the avoidance of doubt the applicant has made reference within the Flood Risk Assessment of a model of the existing drainage system being undertaken to demonstrate compliance with section 24.5 of The SuDS Manual as outlined above to determine the pre-development discharge rate and volume, however this detail appears to be absent from the appendices from the aforementioned document.

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

