REFORD

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23rd October 2025

Ribble Valley Borough Council
Planning Department
Council Offices,
Church Walk,
CLITHEROE,
BB7 2RA

Dear Planning Department

Planning reference: 3/2025/0588
Location : Land east of Clitheroe Road Whalley
Proposal : Proposed erection of 77no. affordable dwellings with associated access, gardens, parking and landscaping areas

We refer to the letter from the Lead Local Flood Authority (LLFA) dated 14th August 2025 in which the LLFA objected to the above planning application. The LLFA gave two reasons for maintaining their objection. They are as follows, along with our responses.

1. **Demonstrate the principle of development.**
   The proposed drainage strategy involves an off-site connection to the open watercourse through third party land and via the existing highway, however, no evidence of an agreement in principle with the landowner or the asset owner has been provided to the Local Planning Authority. Should no agreement be reached, it may not be possible to drain the site, hence the Lead Local Flood Authority are currently unable to agree to the principle of development and recommend the refusal of planning permission, until evidence of an agreement in principle with the appropriate parties, or robust evidence of a 'plan b' outfall location, should a connection to the open watercourse not be possible, has been submitted to and approved in writing by the Local Planning Authority.

Response: The watercourse into which it is intended the surface water runoff from the site is to discharge lies in culvert under Clitheroe Road from the east to the west prior to it being in open channel. If a discharge is not possible into the watercourse where it lies within open channel, then a connection will be made to the culvert where it lies within Clitheroe Road. A plan is attached to this letter showing the route along Clitheroe Road and the proposed connection point.

2. 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.

Response: Paragraph 181 of the National Planning Policy Framework states that *"When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere"*.

- The site is identified as lying within Flood Zone 1 on the Environment Agency's Flood Map for Planning, the lowest risk.
- The Environment Agency Risk of Flooding from Surface Water map indicates a very low chance to the site from surface water flooding except along the site's northern boundary where there is a high chance. It is not planned for any built development along the site's northern boundary where there is a high chance from surface water flooding.
- Surface water runoff from the developed site will be controlled to the existing pre-development Greenfield runoff rate, allowing surface water runoff generated by all rainfall events up to the 100 year critical rain storm plus 50% on stored volumes to be attenuated within the development site prior to discharge.

As such, the development will not increase flood risk elsewhere.

Paragraph 182 of the National Planning Policy Framework states that multifunctional benefits should be provided wherever possible.

Multifunctional benefits have been provided where it is possible. The online Soilscapes Viewer has identified the site lying in a region characterised by slowly permeable seasonally wet acid loamy and clayey soils with impeded drainage and therefore, based upon the ground

conditions identified, infiltration is unlikely to provide a viable drainage solution for surface water runoff generated by the site.

It is intended that the private car parking areas and hardstanding areas adjacent to the dwellings will be constructed from a permeable surface allowing surface water to percolate into the construction matrix, thus controlling surface water run off close to where it falls. In addition, attenuation storage is located at five separate locations within the developed site, each with a restricted discharge, again controlling surface water close to where it falls.

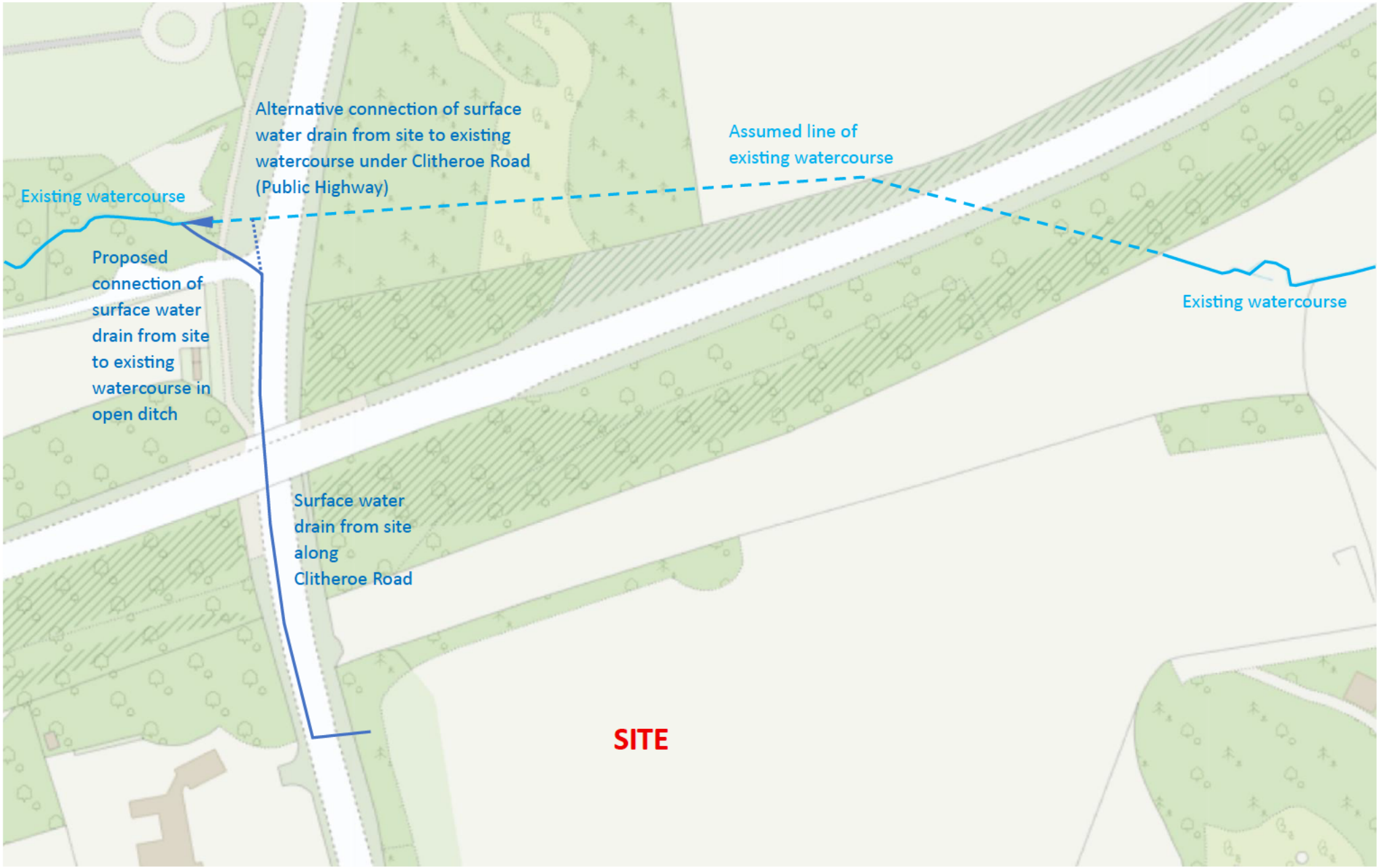
With reference to the above we request that the LLFA remove their objection to the proposal.

Yours sincerely,

Bob Ford

Bob Ford
DIRECTOR
REFORD Consulting Engineers Limited

SURFACE WATER DRAINAGE LAYOUT



SURFACE WATER DRAINAGE FROM SITE TO WATERCOURSE