

Date: 08 January 2026

Dear Local Planning Authority,

Thank you for consulting the Lead Local Flood Authority on the planning application detailed below, received on 13th November 2025.

STATUTORY PLANNING CONSULTATION RESPONSE

Application Number:	3/2025/0801
Proposal:	Proposed erection of new residential development comprising 80 new homes, including 30% affordable housing, open space and associated infrastructure.
Location:	Land to east of Salesbury View Wilpshire

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.

These comments are based on the extent of the knowledge of the Lead Local Flood Authority and the information provided with the application at the time of this response. Comments provided in this representation are advisory. It is ultimately the decision of the Local Planning Authority whether any such recommendations are acted upon.

Lead Local Flood Authority Position

The Lead Local Flood Authority **maintains its objection** to the above application on the basis of:

Objection 01 – Inadequate Surface Water Sustainable Drainage Strategy

In the absence of an acceptable surface water sustainable drainage strategy, we object to this application and recommend refusal of planning permission until sufficient 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 that applications which could affect drainage on or around the site incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, unless there is clear evidence that this would be inappropriate. These systems should provide multifunctional benefits wherever possible and should:

- 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.

The Flood Risk and Coastal Change section of the Planning Practice Guidance reinforces the requirement for sustainable drainage systems to be considered at the start of the design process (Paragraph 055), and makes clear that planning applications need to be supported by a sustainable drainage strategy containing proportionate information on how surface water will be managed to ensure there is no increase in flood risk to others off-site (Paragraph 059). It reinforces the expectation that sustainable drainage systems meet appropriate minimum standards of operation, with clear maintenance and adoption arrangements proposed for the lifetime of the development (Paragraph 058).

The guidance also refers to the National Standards for Sustainable Drainage Systems to inform decisions about the design, maintenance and operation of sustainable drainage systems (Paragraph 057). These Standards provide the most comprehensive and current guidance on minimum operational standards and are a material planning consideration.

The submission of a robust surface water drainage strategy is therefore essential to enable the Local Planning Authority to make informed planning decisions. Without it, the Lead Local Flood Authority is unable to confirm whether the proposed development satisfies the requirements of the National Standards for Sustainable Drainage Systems, and therefore whether it complies with Paragraphs 181 and 182 of the National Planning Policy Framework or the Planning Practice Guidance. This constitutes a clear and sufficient reason for the refusal of planning permission.

In this case, although a drainage strategy has been submitted (11th September 2025 / 210687-EDGE-XX-XX-RP-C-0001_FLOOD RISK ASSESSMENT[P10] / EDGE Consulting Engineers), it is considered inadequate. It does not satisfy the requirements of the National Standards for Sustainable Drainage Systems for the following reasons:

1. **Inadequate Runoff Destination** – The proposed drainage strategy fails to demonstrate compliance with the priority hierarchy of runoff destinations set out in Standard 1 (Runoff Destinations) of the National Standards for Sustainable Drainage Systems. This Standard requires applicants to demonstrate that surface water runoff from new developments will be discharged according to a priority hierarchy, and for all higher priority destinations to be utilised to the maximum extent practicable.

In this case, the applicant proposes to discharge surface water runoff from this development to the watercourse to the south. However, sufficient evidence has not



been provided to demonstrate that all higher priority final destinations have been utilised to the maximum extent practicable. This includes non-potable use and infiltration as specified and detailed within Standard 1.

Further evidence is therefore required to demonstrate compliance with Standard 1 of the National Standards for Sustainable Drainage Systems.

2. **Failure to Manage Everyday Rainfall** – The proposed drainage strategy fails to demonstrate that the proposed development provides adequate measures to manage runoff from everyday rainfall events, as required by Standard 2 (Management of Everyday Rainfall (Interception)) of the National Standards for Sustainable Systems. This Standard requires a 'SuDS approach' to be applied so that at least the first 5mm of rainfall for the majority of rainfall events does not result in runoff from the site to surface waters or piped drainage systems.

Further evidence is therefore required to demonstrate compliance with Standard 2 of the National Standards for Sustainable Drainage Systems.

This should include evidence that runoff from each positively drained surface, for at least the first 5mm of rainfall, is either collected for use, infiltrated into the ground, or else captured, conveyed and stored within SuDS features. These features shall naturally absorb or retain runoff and from these the runoff will be 'lost' to soils or the atmosphere and will not discharge off the site, as required by Section 2.6.

3. **Inconsistent contributing area to size the SuDS** – The proposed drainage strategy fails to demonstrate compliance with Standard 3 of the National Standards for Sustainable Drainage Systems.

The submitted drainage strategy sizes the SuDS and the discharge rate 28.9/s based approximately on a contributing area of 3.327ha only, however the applicant has provided evidence that the proposed contributing area for the development is approximately 1.988ha, in addition to this the applicant has failed to include the proposed attenuation pond as part of the contributing area, and therefore means that the SuDS is potentially undersized.

Standard 3 requires that the entire development area that could potentially drain to the proposed surface water drainage system in an extreme event shall be used for estimating greenfield runoff rates and volumes (including both permeable and impermeable surfaces). For the avoidance of doubt, the runoff area used in any of the runoff estimation methods should be consistent, as outlined in The SuDS Manual.

The applicant has stated that infiltration is not possible on the proposed development and, therefore, while these areas, such as gardens, roadside verges and areas of public open space, may not be positively drained, they may contribute indirectly to the drainage system during extreme events.

The applicant must design their SuDS with an appropriate estimation of the area contributing to the drainage system, both permeable and impermeable, with evidence of this area provided through an appropriate contributing area plan, or



otherwise demonstrate how surface water runoff from non-drained areas will be managed without contributing to the drainage system and without increasing flood risk onsite or elsewhere.

Overcoming Our Objection

You can overcome this objection by submitting a surface water sustainable drainage strategy that addresses the deficiencies identified above and demonstrates how surface water will be managed within the development in accordance with:

- Paragraphs 181 and 182 of the National Planning Policy Framework,
- The Flood Risk and Coastal Change section of the Planning Practice Guidance, and
- The National Standards for Sustainable Drainage Systems.

Please note that submission of additional information will not automatically result in the removal of this objection. The submitted evidence must be technically robust, policy-compliant, and proportionate to the nature and scale of the development.

Please note that our objection(s) will be maintained until the required information, as outlined above, has been received and reviewed. The submission of amended information alone will not in itself result in the removal of the objection.

Lead Local Flood Authority Site-Specific Advice

The following comments are provided to assist the Local Planning Authority in its consideration of this application. While they do not constitute a formal objection, they highlight areas that may benefit from further attention, either at this stage or in future submissions. These comments are intended to support informed decision-making and encourage the adoption of relevant guidance, standards, and best practice.

- For the avoidance of doubt the applicant has failed to provide any updated information to address objection points 1 and 2 and in regard to point 3, the applicant has failed to provide evidence of a consistent approach to calculating the discharge rate and the required storage volumes, as outlined above. Should the applicant proposing to drain the entire site area then it would be appropriate to propose a discharge rate based on this area and the SuDS based on that rate, however, should this not be the case as evidenced in the catchment plan, then the discharge rate and SuDS should be based on the contributing area. As stated previously the proposed SuDS pond should be incorporated into the contributing area.
- The applicant is advised to take into consideration the detail and requirements of Standard 7, which outlines the construction, operation and maintenance of SuDS, the applicant is expected to appropriately consider the future management and maintenance implications of the proposed final outfall and its route through private property. Consideration should be given to the layout and providing an easement between these houses as well as the potential exceedance from the proposed SuDS attenuation pond and the risks due to the placement of houses downhill or in the flow path of any exceedance.



Accessing Additional Advice

If the applicant wishes to discuss any aspect of this response with the Lead Local Flood Authority, they can choose to do so through our charged for [Lead Local Flood Authority Advice Service](#).

Applicants can also access separate advice from the county council's Highway Authority on how individual developments will impact the highway network via the [Pre-Planning Application Highway Advice Service](#).

What This Response Does Not cover

This response does not assess matters relating to:

- **Other sources of flooding**, including the risk of flooding from rivers (fluvial), the sea (coastal), groundwater, sewers (surface water or foul), highways, canals, and reservoirs.
- **Application of the Sequential and Exception Tests**, which is a matter for the Local Planning Authority.
- **Highways**, including highway drainage, flood water exceedance on the highway, highway adoption (Section 38) and off highway works (Section 278) under the Highways Act 1980.
- **Amenity** as set out in Standard 5 from the National Standards for Sustainable Drainage Systems.
- **Biodiversity** as set out in Standard 6 from the National Standards for Sustainable Drainage Systems.

Material Changes or Additional Information

If any material changes are made to the submitted information, or if additional information is provided after this response that affects surface water management, the Local Planning Authority is advised to re-consult the Lead Local Flood Authority. **Please note this will be treated as a formal re-consultation, subject to a full 21-day response period.** Re-consultations should be sent to our identified mailbox.

If the Local Planning Authority choose to determine the application contrary to the advice provided by the Lead Local Flood Authority, we will be unable to support the application at appeal or at any future discharge of conditions stage relating to conditions we have not recommended.

Please send a copy of the decision notice to our identified mailbox.

Yours faithfully,

Harry McGaghey

Lead Local Flood Authority

