

**Date:** 26 March 2026

Dear Local Planning Authority,

Thank you for consulting the Lead Local Flood Authority on the planning application detailed below, received on 25<sup>th</sup> March 2026.

**STATUTORY PLANNING CONSULTATION RESPONSE**

<b>Application Number:</b>	3/2026/0214
<b>Proposal:</b>	Proposed erection of 26 affordable dwellings with associated access, gardens, parking and landscaping.
<b>Location:</b>	Land at Albany Drive Copster Green BB1 9EH

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 **objects** 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, 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 field drain. 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.



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. Failure to Demonstrate Appropriate Peak Discharge Rate** – The applicant has failed to demonstrate that the proposed development provides appropriate minimum operational standards for peak discharge rate, as required by Standard 3 (Management of Extreme Rainfall and Flooding) of the National Standards for Sustainable Drainage Systems. This Standard requires that:

For greenfield sites, the peak discharge rate from the development to surface waters or sewers for the 50% (1 in 2-year) annual exceedance probability rainfall event shall be limited to the equivalent 50% annual exceedance probability greenfield runoff rate, or 3 litres per second per hectare, whichever is greater.

The submitted evidence fails to demonstrate that the peak discharge rate from the development to the field drain will be limited in accordance with these parameters, the requirements of Standard 3 have not been met. Further evidence is therefore required to demonstrate compliance with Standard 3 of the National Standards for Sustainable Drainage Systems.

- 4. Failure to Demonstrate Appropriate Runoff Volume Control** – The applicant has failed to demonstrate that the proposed development provides appropriate minimum operational standards for runoff volume and peak discharge rate, as required by Standard 3 (Management of Extreme Rainfall and Flooding) of the National Standards for Sustainable Drainage Systems. This Standard requires that:

If the post-development runoff volume discharged from the development to surface waters or sewers for the 1% (1 in 100-year) annual exceedance probability, 6-hour rainfall event is greater than the volume of greenfield runoff for the same rainfall



event, the peak allowable discharge rate from the development for the 1% (1 in 100-year) annual exceedance probability shall be limited to the 50% (1 in 2-year) annual exceedance probability greenfield runoff rate, or 3 litres per second per hectare, whichever is greater.

As the submitted evidence fails to demonstrate that the post-development runoff volume and peak discharge rate from the development to the field drain will be limited in accordance with these parameters, the requirements of Standard 3 have not been met. Further evidence is therefore required to demonstrate compliance with Standard 3 of the National Standards for Sustainable Drainage Systems.

### **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 Lead Local Flood Authority make note to the Local Planning Authority and to the applicant that the information provided in regard to the drainage strategy, which should provide information on the greenfield scenario of the development site and the post development proposals is either lacking in some areas or inconsistent with its information.

For example, the applicant has provided conflicting mention of the existence of ordinary watercourses or the appropriate climate change allowances, these inconsistencies should be addressed and clarity provided in order to demonstrate clearly the existing site and the post development situation.



- In addition to this, the Lead Local Flood Authority strongly advises the applicant to reconsider its proposals for connecting the foul drainage into the surface water system or the proposed surface water sustainable drainage features such as the swale, attenuation or final outfall. It is generally understood that foul and surface water should be drained on separate systems, and this approach would see these two systems joined at multiple points.
- The applicant is expected to ensure that their drainage proposals have been designed to account for the updated Standards for sustainable drainage systems (June 2025), as well as provide evidence of the greenfield discharge rate and volumes, and the post development discharge rates and volumes and the methodologies for calculating these are consistent.
- The submitted drainage strategy sizes the SuDS based on a greenfield discharge rate of approximately 9l/s (which is based on the whole site area), but has proposed to discharge surface water at approximately 3l/s, therefore meaning that the suds are potentially undersized.

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. For the avoidance of doubt, the runoff area used in any of the runoff estimation methods should be consistent.

Should infiltration 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.

### **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

