



Our Reference : D4617-L-02
Your Reference : 3/2026/0573

24 August 2026

Dear Sirs,

Higher College Farm Lower Road Longridge PR3 2YY
LLFA Response

PSA Design have received Lancashire LLFA's comments in relation to "Approval of details reserved by conditions 17 (Surface Water Drainage Strategy) and 18 (Construction Surface Water Management Plan) of appeal decision 6001560 (planning application reference 3/2025/0653).

This letter sets out our response and where appropriate introduces amendments made to relevant submitted documents.

Taking each point in turn:-

Condition 17 (Surface Water Drainage Strategy)

LLFA Comment - The applicant has failed to provide evidence of an assessment of the existing onsite culverted 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.

As set out in PSA Design supporting statement (D4617-L-01) "Surface water from the site has been designed with an outfall into a private 225mm diameter surface water pipe that currently serves Higher College Farm. This pipe network has been surveyed and found to be in good condition with ultimate outfall into open watercourse immediately south of the site".

The 225mm diameter pipe does not connect into the adjacent culverted watercourse, more so it runs parallel to it with outfall direct to open watercourse topographically and locationally lower than the site. This pipe is therefore owned and maintained by the applicant who also owns Higher College Farm to the south of the development site.

The existing 225mm dia pipe serves a modest amount of existing contributing area. It has two 100mm diameter inlets feeding into it. The gully itself has a maximum contributing area of 180sqm. Putting that into context:

A 100mm dia pipe @ 1 in 30 gradient, each has a flow capacity of circa 11l/s. The catchment of impermeable area draining to the gully during a 1 in 100yr event is estimated at circa 8l/s. Therefore, it is estimated that there is currently a maximum of 30 l/s running through the outfall pipe during peak events.

The 225mm dia sewer has a non-surcharged capacity calculated at 60l/s. Thus leaving a comfortable 30l/s capacity. This would easily accommodate the additional 10.2 l/s from the proposed development. Surcharged capacity estimates would be significantly more and also proportionally greater than the run-off from the existing 100mm inlet pipes.

Notwithstanding the above, as set out within the supporting statement (D4617-L-01), the system has also been modelled against a surcharged outfall up (surcharged up to outfall cover level). The model demonstrated zero flooding during the 1 in 30yr + 40% CC event with some modest flooding from a few inspection chambers, very similar to the corresponding non-surcharged event.

In conclusion, we believe the 225mm diameter pipe is in suitable condition and has capacity to accommodate the peak design flow from the proposed development.

Condition 18 (CSWMP).

LLFA Comment - *The applicant has failed to provide evidence to demonstrate an appropriate location of where surface water will be collected and rained onsite and how the applicant intends to control the discharge of this surface water from the development during the construction phase prior to the drainage being implemented in full, and so it does not exceed the equivalent greenfield runoff rate.*

The CSWMP submitted included a surface water mitigation measures plan (D4617-C-01). The plan showed a temporary outlet to be built should the need arise (monitored on site) which would be

connected into the proposed drainage outfall shown on the proposed drainage layout. This outfall will solely be used to capture overland surface water flows from the unpaved areas of development (i.e. greenfield run-off) during the construction phase only. It is acknowledged during the site profiling natural greenfield run-off rates will increase and hence the introduction of the earth bund to provide temporary storage during heavy rainfall events.

For the avoidance of doubt, the temporary outfall pipe has now been defined at 100mm (on the CSWMP drawing C-01). This orifice will naturally restrict surface water run-off from the proposed development during the early construction phase (to put this orifice into context, the hydro-brake diameter limiting to the “approved run-off rate” is 137mm).

As set out within the CSWMP the report establishes the proposed construction phases. This is repeated below:

1. Site clearance and compound set up.
2. Minor Earthworks; shaping and reprofiling the ground.
3. **Installation of drainage.**

During phases 1 and 2 the ground will be undeveloped and to an extent mimic pre-existing run-off regimes, albeit with some increased overland flows collected and restricted by the temporary measures above. For the avoidance of doubt, Section 2.6 of the CSWMP has been amended so item 2 in the list above is “install off-site drainage connection”. Para 5.10 has also been added to reinforce that the offsite surface water connection should be constructed first. Following that the storage and control chamber will then be constructed followed by the remaining underground drainage throughout the site.

LLFA Comment - For the avoidance of doubt, the applicant has stated that the bunds will temporarily store surface water runoff, however, the applicant has also located the welfare units and storage of plant and materials in this same location.

Welfare units on site will be typical portakabin type structures raised 600mm above ground level. It is not envisaged that temporary surface water flood depths would be anywhere near those heights. If they were then as part of the CSWMP monitoring procedure they would if necessary be moved or suitably protected. Consequences of work cabins flooding are negligible in any event. Any cars on site would belong to the contractors and visitors on site, so again, these would clearly be moved as necessary in the event of a flood. The flood inundation would be gradual and slow, not quickly onset. Similarly, materials stored on site would be little consequent to flooding. Any hazardous materials or liquids are specifically addressed with the CSWMP.

LLFA Comment - *The proposed development will see the conversion of permeable surfaces to impermeable surfaces as well as the impaction of soils during the construction phase, therefore it is important that due regard to the storage and disposal and surface water has been taken into consideration during the construction phase and prior to the proposed surface water sustainable drainage system being constructed*

It has been established above the underground drainage system will be constructed in a timely manner to ensure flow rates are limited to the allowable discharge rate. As and when car parks, access and roads are constructed they will be connected into the wider underground drainage system which is ultimately restricted by a suitable flow control chamber.

It is therefore concluded that the CSWMP will ensure that surface water flows will be controlled both during and after the construction of the development. The CSWMP is a dynamic "live" document meant to be continually reviewed, updated, and adapted as a project progresses to address changing site conditions, unexpected weather events, and evolving construction methods. Notwithstanding that, it should also be noted that the applicant also has ownership and control of the land to the south (topographically lower) and thus, any overland flood flows will be maintained within their ownership and picked up within existing yard gullies / landscaping to the south.

Yours sincerely,



Graham Sanderson
Director, PSA Design Ltd.