APPLICATION CONSULTATION RESPONSE

<table>
<thead>
<tr>
<th>Application Number:</th>
<th>3/2015/0943</th>
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<tbody>
<tr>
<td>Location:</td>
<td>Holmes Mill, Greenacre Street, Clitheroe, BB7 1EB</td>
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<td>Proposal:</td>
<td>Renovation and conversion of Grade II Listed property to create kitchens, restaurant bar, 31 room apart-hotel, brewery with retail outlet, bakery, function room, offices, two retail units and gym/spa leisure complex.</td>
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Thank you for inviting the Lead Local Flood Authority (LLFA) to comment on the above application. The Flood and Water Management Act 2010 sets out the requirement for LLFAs to manage 'local' flood risk within their area. 'Local' flood risk refers to flooding or flood risk from surface water, groundwater or from ordinary watercourses.

Comments provided in this representation, including conditions, are advisory and it is the decision of the Local Planning Authority (LPA) whether any such recommendations are acted upon. It is ultimately the responsibility of the Local Planning Authority to approve, or otherwise, any drainage strategy for the associated development proposal. The comments given have been composed based on the current extent of the knowledge of the LLFA 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 development proposal on the basis of:

1. Inadequate flood risk assessment: The Lead Local Flood Authority objects to this application and recommends refusal of planning permission until an acceptable flood risk assessment has been submitted to the local planning authority:

**Reason:** The flood risk assessment submitted in support of this application (Ref: '2015-028-RevB'; Dated: '07/05/2015'; By: 'Flood Risk Consultancy Limited') does not fully comply with the requirements set out in paragraph 30 of the Planning Practice Guidance, and therefore paragraph 103 of the NPPF cannot be satisfied.
The submitted flood risk assessment does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted flood risk assessment fails to:

- Adequately describe the existing surface water drainage arrangements for the site.
- Provide existing surface water runoff rates and volumes for the site.
- Provide any details in relation to the pre-development greenfield runoff rates and volumes for the site.
- Adequately demonstrate how surface water will be safely managed within the proposed development, taking into account the impacts of climate change. This includes providing an indicative surface water drainage strategy for the site, along with approximate surface water runoff rates and volumes from the proposed development.

**Overcoming our objection:** It will be possible for you to overcome our objection if an adequate FRA is submitted which specifically and satisfactorily addresses the following points:

- The provision of an adequate description of the existing surface water drainage arrangements for the site.
- The provision of existing surface water runoff rates and volumes for the site (1 in 1 year, 1 in 2.2 year (Qbar), 1 in 30 & 1 in 100 year).
- The provision of pre-development greenfield runoff rates and volumes for the site (1 in 1 year, 1 in 2.2 year (Qbar), 1 in 30 & 1 in 100 year).
- The provision of an indicative surface water drainage strategy that demonstrates how surface water will be safely managed for the lifetime of the development. This should include approximate surface water runoff rates and volumes from the proposed development (1 in 1 year, 1 in 2.2 year (Qbar), 1 in 30 & 1 in 100 year + allowance for climate change) and any provisions for intercepting and slowing the flow of surface water. The indicative surface water drainage strategy should also provide details relating to the indicative size and location of any proposed sustainable drainage systems.

If this cannot be achieved then we are likely to maintain our objection to this application. The Environment Agency should also be consulted on any issues relating to fluvial flooding (flooding from the Main River).
2. Proposal contrary to National Planning Guidance - Runoff Destinations: The Lead Local Flood Authority objects to this application and recommends refusal of planning permission until robust evidence has been submitted to the local planning authority demonstrating why higher priority discharge points for the runoff destination of surface water are not reasonably practicable, in line with Planning Practice Guidance.

Reason: The Planning Practice Guidance requires applicants for planning permission to discharge surface water runoff according to a hierarchy of runoff destinations. The Planning Practice Guidance states that 'sustainable drainage systems should be provided unless demonstrated to be inappropriate' and 'the aim should be to discharge surface run off as high up the...hierarchy of drainage options as reasonably practicable.' The hierarchy for surface water runoff destinations is as follows:

- into the ground (infiltration);
- to a surface water body;
- to a surface water sewer, highway drain, or another drainage system;
- to a combined sewer.

The proposed development appears to be contrary to Paragraph 80 of the PPG as the hierarchy for surface water runoff destinations does not appear to have been given adequate consideration. The applicant has not provided robust justification as to why other preferable run off destinations, notably into the ground (infiltration), cannot be utilised. The absence of this evidence is contrary to policy and therefore sufficient reason in itself for a refusal of planning permission.

Overcoming our objection: The LLFA objection may be overcome by submitting further evidence of the chosen runoff destination and robust justification of this runoff destination over preferable destinations set out in the hierarchy contained in the Planning Practice Guidance (as identified above). If robust justification or evidence is provided as to why preferable runoff destinations cannot be achieved is not provided, in line with Planning Practice Guidance, we will consider whether there is a need to maintain our objection to the application.

We ask to be re-consulted following the submission of additional information addressing the matters above. We will then provide you with comments within 21 days of receiving formal re-consultation.

For the avoidance of doubt, our objection will be maintained until an adequate level of information has been submitted which satisfies the principles outlined above.

Yours faithfully,

Chris Dunderdale
Lead Local Flood Authority