Dear Sir/Madam

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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<tr>
<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 amended information which was received on 1st March 2016.

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.

Surface water discharge

The Planning Practice Guidance (PPG) establishes a hierarchy for surface water disposal, which encourages a SuDS approach:

- Generally, the aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:
  - into the ground (infiltration);
  - to a surface water body;
  - to a surface water sewer, highway drain, or another drainage system;

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It is evident from the application form that the applicant intends to discharge surface water to a watercourse. Whilst other preferable runoff destinations should be considered first, namely infiltration to ground, it is noted from Appendix F of the Flood Risk Assessment (Titled: 'Level 2 Scoping Study Flood Risk & Drainage Impact Assessment'; Ref: '2015-028-RevC'; Dated: ‘26/02/2016'; By: 'Flood Risk Consultancy Limited') that infiltration based SuDS techniques would not be suitable for this site. For this reason, the Lead Local Flood Authority considers discharge to a watercourse to be acceptable, subject to sufficient evidence of permeability testing for the site and subject to agreement from the Environment Agency.

**Sustainable Drainage Systems: General Advice**

Paragraph 103 of the National Planning Policy Framework (NPPF) and Written Statement on Sustainable Drainage Systems (HCWS161) requires that surface water arising from a developed site should, as far as it is practicable, be managed in a sustainable manner to mimic surface water flows arising from the site prior to the proposed development, whilst reducing flood risk to the site itself and elsewhere, taking climate change into account.

The Lead Local Flood Authority encourages that site surface water drainage is designed in line with the Non-Statutory Technical Standards for Sustainable Drainage Systems and Planning Practice Guidance, including restricting developed discharge of surface water to greenfield runoff rates making suitable allowances for climate change and urban creep, managing surface water as close to the surface as possible and prioritising infiltration as a means of surface water disposal where possible.

Regardless of the site’s status as greenfield or brownfield land, the Lead Local Flood Authority encourages that surface water discharge from the developed site should be as close to the greenfield runoff rate as is reasonably practicable in accordance with Standard 2 and Standard 3 of the Non-Statutory Technical Standards for Sustainable Drainage Systems.

Sustainable drainage systems offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge absorbing diffuse pollutants and improving water quality. Ponds, reedbeds and seasonally flooded grasslands can be particularly attractive features within public open space.
The wide variety of available sustainable drainage techniques means that virtually any development should be able to include a scheme based around these principles and provide multiple benefits, reducing costs and maintenance needs.

**Multi-Functional SuDS**

The multifunctional potential of sustainable drainage systems (SuDS) should be exploited to maximise their cost effectiveness, regardless of the size of development site. Early design consideration is advised to build SuDS into multi-functional spaces and build up a network of SuDS that manage runoff close to its source to avoid the need for large storage areas.

Designing green space and public realm with SuDS that work well when both wet and dry can provide valuable community recreational space as well as important blue and green infrastructure. Sports pitches, squares, courtyards, playgrounds, landscapes around buildings, urban parks, green corridors and woodlands are all popular types of open space which can be integrated with SuDS. SuDS can also contribute to development targets for open space where they are designed to be multi-functional.

On smaller development sites, space efficient SuDS can still be incorporated and include, for example, green roofs, bioretention gardens, permeable paving, rills, rainwater harvesting, hardscape storage, micro-wetlands, and bioretention tree pits.

**Water Quality: Water Framework Directive**

Under the Water Framework Directive (WFD), all water bodies should reach ‘good ecological status’ by 2015. No activities or works, including the proposed development, should deteriorate the status of any nearby watercourse as the main objectives for the WFD is to prevent deterioration in ‘status’ for all waterbodies. The ecological health of any receiving watercourse can be protected by the implementation of a SuDS scheme with an appropriate number of treatment stages that are appropriately maintained. Current WFD ecological status of all assessed water bodies is available on the EA website.

Local government has a major role in delivering and achieving the objectives set out in the WFD and to help the natural and modified environment adapt to the impacts of climate change. One mechanism of doing so is through the planning and development process to ensure that new developments do not pose a threat to water quality. It is recommended that the developer has regard for the WFD in developing a detailed drainage strategy and that the local planning authority considers appropriate conditions to secure this, where applicable.
**Flood Risk Assessment**

An important part of the planning application process is consideration of flood risk as detailed under Footnote 20 of Paragraph 103 of the National Planning Policy Framework (NPPF). This is facilitated through a site-specific flood risk assessment (FRA) which is required for this development proposal as the proposal involves building or engineering works in zone 2 or 3 of areas at risk of flooding from rivers or the sea. The Lead Local Flood Authority advises that flooding from local sources should be appropriately assessed within the FRA, in addition to the flood risk from fluvial and coastal sources.

Whilst it is recognised that the final proposals for the formal surface water drainage strategy are yet to be finalised, it is evident from Appendix F of the FRA (Titled: 'Level 2 Scoping Study Flood Risk & Drainage Impact Assessment'; Ref: '2015-028-RevC'; Dated: '26/02/2016'; By: 'Flood Risk Consultancy Limited') that an existing system of surface water pipes are intended to be incorporated within the surface water drainage strategy for the development. An indicative layout plan (Ref: 2015-028-02'; Dated: '29-01-2016'; By: 'Flood Risk Consultancy Limited) has also been provided within Appendix F of the FRA to reflect how the developer intends to construct the development should approval be granted for this development proposal. The Lead Local Flood Authority (LLFA) has reviewed these details and has the following comments to make:

- **Comment 1:** It is noted from Appendix F of the FRA, that there are a number of gaps in the base of the wall along the course of Mearley Brook which allow surface water to discharge directly into the watercourse. In order to ensure that this area can be sufficiently drained, the LLFA recommends for the applicant to consider formalising the drainage in this area as part of the formal surface water drainage strategy for the site. It is advised that the Local Planning Authority take note of this and if minded to approve, attach an appropriate condition to the formal Decision Notice.

- **Comment 2:** It is noted from Appendix F of the FRA, that the surface water pipes are likely to surcharge and flood the development site during the 1 in 30 year and 1 in 100 year rainfall events. Based on engineering judgement, the applicant anticipates that any flooding would occur within the tarmac area to the south and east of the site, adjacent to Mearley Brook, before flowing into the brook through existing gaps in the wall. The applicant does not however, appear to have provided sufficient evidence to demonstrate that this will not
result in flooding to property or critical infrastructure. The LLFA would request therefore, for the applicant to provide appropriate hydraulic calculations and flood water exceedance routes as part of the formal surface water drainage strategy for the site.

- **Comment 3:** It is noted from Appendix F of the FRA, that the proposed surface water runoff rates from the development will be the same as the pre-development runoff rates. Consideration has however, been given to incorporating SuDS, such as raised rain gardens, within the drainage system to intercept flows of surface water during high intensity rainfall events. Whilst this is encouraging, the LLFA does recommend for the applicant to also explore the use of other SuDS features in order to reduce the rate and volume of surface water draining from the site. Please note that some SuDS features may require certain permitted development to be removed from land on or within close proximity to where it is located. It is advised that the Local Planning Authority take note of this and if minded to approve, attach an appropriate informative to the formal Decision Notice.

It should also be noted that any proposed raised rain gardens must not be included as part of the hydrological calculations. Occupants may choose to remove these in the future and this may have the potential to increase surface water runoff which was previously unallocated for in the design of the sustainable drainage system. Where raised rain gardens are included in the hydrological calculations of a development proposal, the local planning authority is advised to consider the removal of permitted development rights.

**It is essential that a formal detailed surface water drainage strategy is submitted to and approved in writing by the local planning authority, prior to the commencement of any development.** This is to ensure that the proposed development can be adequately drained and that there is no flood risk on or off the site resulting from the proposed development. The LLFA would ask to be formally consulted on all subsequent drainage strategies for this proposed development.

**Lead Local Flood Authority (LLFA) Position**

The LLFA wishes to withdraw its objection to the proposed development which will be acceptable subject the inclusion of the following recommended planning condition(s).
Formal Surface Water Drainage Strategy Approval

Condition 1: No development shall commence until details of the design, implementation, maintenance and management of a formal surface water drainage scheme have been submitted to and approved in writing by the local planning authority. Those details shall include, as a minimum:

a) Demonstration that surface water run-off will not exceed pre-development run-off rates and volumes. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

b) Information about the design storm period and intensity (1 in 30 & 1 in 100 year +30% allowance for climate change), discharge rates and volumes (both pre and post development), temporary storage facilities, means of access for maintenance, the methods employed to delay and control surface water discharged from the site, and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters, including watercourses;

c) Details of any mitigation measures to manage surface water

d) Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant);

e) Overland flow routes and flood water exceedance routes, both on and off site. For the avoidance of doubt, overland flow routes and flood water exceedance routes must be directed away from properties and critical infrastructure, and surface water from the development site must be contained within the red line boundary.

f) A timetable for implementation;

g) Evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltration rates;

The scheme shall be implemented in accordance with the approved details prior to first occupation of any of the approved dwellings, or completion of the development, whichever is the sooner. Thereafter the drainage system shall be retained, managed and maintained in accordance with the approved details.

Reasons: To ensure that the proposed development can be adequately drained. To ensure that there is no flood risk on or off the site resulting from the proposed development. To ensure that appropriate and sufficient funding and maintenance
mechanisms are put in place for the lifetime of the development to reduce the flood risk to the development as a result of inadequate maintenance and to identify the responsible body/bodies for the sustainable drainage system.

Surface Water Lifetime Management and Maintenance Plan

Condition 2: No development shall commence until details of an appropriate management and maintenance plan for the sustainable drainage system for the lifetime of the development have been submitted which, as a minimum, shall include:

a) the arrangements for adoption by an appropriate public body or statutory undertaker, management and maintenance by a Residents’ Management Company

b) arrangements concerning appropriate funding mechanisms for its on-going maintenance of all elements of the sustainable drainage system (including mechanical components) and will include elements such as:
   i. on-going inspections relating to performance and asset condition assessments
   ii. operation costs for regular maintenance, remedial works and irregular maintenance caused by less sustainable limited life assets or any other arrangements to secure the operation of the surface water drainage scheme throughout its lifetime;

c) means of access for maintenance and easements where applicable.

The plan shall be implemented in accordance with the approved details prior to first occupation of any of the approved dwellings, or completion of the development, whichever is the sooner. Thereafter the sustainable drainage system shall be managed and maintained in accordance with the approved details.

Reasons: To ensure that appropriate and sufficient funding and maintenance mechanisms are put in place for the lifetime of the development; to reduce the flood risk to the development as a result of inadequate maintenance and to identify the responsible organisation/body/company/undertaker for the sustainable drainage system.

It should be noted, that the LLFA objection has been withdrawn following discussions with the developer and following the submission of a revised Flood Risk Assessment (FRA). Though the applicant has not reduced the proposed surface water discharge rate, the LLFA is now satisfied that the proposed discharge rate will not lead to an increased flood risk, subject to the inclusion of the recommended conditions.
Should you wish for further information or clarification to the contents of this letter please contact the case officer on the number provided on this letter.

Yours faithfully,

Chris Dunderdale
Flood Risk Management