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Date: 23rd July 2019

APPLICATION CONSULTATION RESPONSE

Application Number:	06/2019/0752
Location:	Land at Cardwell Farm, Garstang Road, Preston, Barton, PR3 5DR
Grid Ref:	E 351959, N 436739
Proposal:	Outline planning application for up to 151no. dwellings and community building with associated works (access applied for only)

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 has **no objection** to the proposed development subject to the inclusion of the following conditions, in consultation with the Lead Local Flood Authority:

Condition 1- Final Sustainable Drainage scheme to be submitted

No development shall commence until final details of the design, based on sustainable drainage principles, and implementation of an appropriate surface water sustainable drainage scheme have been submitted to and approved in writing by the local planning authority and LLFA.

Those details shall include:

- a) Final sustainable drainage layout plan appropriately labelled to include all pipe/structure references, dimensions, design levels, finished floor levels in AOD with adjacent ground levels.
- b) Proposed ground levels along the boundaries with nos.620-630, 654-666 Garstang Road, Barton, nos.18, 20 & 22 Woodlands Crescent, Barton and nos.22 and 23 Woodlands Way, Barton are required.
- c) The drainage strategy should be in accordance with the principles of the Betts Hydro Land at Cardwell Farm, Garstang Road, Barton Flood Risk Assessment & Drainage Management Strategy ref.HYD345_CARDWELL.FARM_FRA&DMS revision 1.0 dated 17th June 2019 and demonstrate that the surface water run-off must not exceed the pre-development greenfield runoff rate. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.
- d) Sustainable drainage flow calculations (1 in 1, 1 in 2, 1 in 30 and 1 in 100 + climate change).
- e) Plan identifying areas contributing to the drainage network
- f) Measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters, including watercourses,
- g) A plan to show overland flow routes and flood water exceedance routes and flood extents.
- h) Evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltrations rates;
- i) Breakdown of attenuation volume in pipes, manholes and attenuation ponds.
- j) Details of an appropriate management and maintenance plan for the sustainable drainage system for the lifetime of the development. This shall include arrangements for adoption by an appropriate public body or statutory undertaker or management and maintenance by a Management Company and any means of access for maintenance and easements, where applicable

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

1. To ensure that the final drainage designs are appropriate following detailed design investigation.
2. To ensure that the proposed development can be adequately drained.
3. To ensure that there is no flood risk on or off the site resulting from the proposed development
4. To ensure that water quality is not detrimentally impacted by the development proposal
5. To reduce the flood risk to the development as a result of inadequate maintenance

6. To identify the responsible organisation/body/company/undertaker for the sustainable drainage system

Informative 1 - Response does not grant permission to make connections to the ordinary watercourses

For the avoidance of doubt, this response does not grant the applicant permission to make connections to the ordinary watercourses and, once planning permission has been obtained, it does not mean that land drainage consent will be given.

The applicant should obtain Land Drainage Consent from Lancashire County Council **before** starting any works on site.

Reason for pre-commencement conditions

Drainage is not only a material consideration but an early and fundamental activity in the ground construction phase of any development and it is likely to be physically inaccessible at a later stage by being buried or built over. It is of concern to **all** flood risk management authorities that an agreed approach is approved before development commences to avoid putting existing and new communities at risk.

The revised NPPF considers sustainable drainage systems to be important and states that they should be incorporated unless there is clear evidence that this would be inappropriate and, as such the LLFA needs to be confident that flood risk is being adequately considered, designed for and that any residual risk is being safely managed. To be able to do this the LLFA requires an amount of certainty either by upfront detail or secured by way of appropriate planning condition(s).

The proposed pre-commencement condition(s) allows for the principle of development to be granted and detailed drainage designs to be conditioned for approval via reserved matters or via a discharge of condition application which could be more favourable to developers in terms of less delay and less financial outlay early in the process. Non-acceptance of the pre-commencement condition could lead the LLFA to object to the principle of development until all residual risk issues are safely managed.

We ask to be re-consulted following the submission of additional information addressing surface water drainage proposals. We will provide you with comments within 21 days of receiving formal re-consultation.

Yours faithfully,

Steven Warren
Lead Local Flood Authority