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Date: 23rd March 2021

APPLICATION CONSULTATION RESPONSE

Application Number:	LCC/2021/0002
Location:	Broadgate, Riverside and Riverside Road, Preston
Grid Ref:	E 353204, N 428256
Proposal:	Works associated with Areas 1 and 2 of the Preston and South Ribble flood risk management scheme consisting of new and replacement flood defences along the north and south banks of the River Ribble and other ancillary flood works, including : Land reprofiling, landscaping and habitat creation, works to tie-in to the Grade II listed Penwortham Old Bridge and railway viaduct over River Ribble, a temporary remote construction compound and temporary site access.

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.

LLFA Comments

The LLFA notes that the Jacobs Impacts on Flood Risk from Preston and South Ribble FRMS in Area 1 and 2 Project no.B550B008 dated 5th March 2021 states 'The impact on surface water (overland runoff), groundwater, sewer and water main sources of flood risk is negligible.'

Although detailed layout plans have been provided it was not known and remains unclear whether all the surface water outfalls into the River Ribble from Broadgate have been located and detailed on the plans. A 450 mm diameter surface water culvert outfall between River Parade and Winckley Road detailed on United Utilities apparatus plans has not been detailed. Potentially there are also other surface water outfalls from Broadgate that discharge highway surface water that have not been included. Therefore the LPA is advised to require a condition to secure final detailed drainage designs once the applicant has progressed to detailed design stage.

The LLFA notes that there will be a small increase in impermeable area between Penwortham Old Bridge and Miller Gardens Apartments which is proposed will be captured by the new double gullies in the highway. It is unclear who the asset owner(s) will be for the additional footway area and proposed new surface water outfalls into the River Ribble. It is advised that this matter is reviewed appropriately by the Highway Authority and United Utilities to ensure there is clarification with regards to any communication with existing assets and future ownership and maintenance of such assets. It is also advised that the verification of new assets will be required by the intended asset owners.

Lead Local Flood Authority Position

The Lead Local Flood Authority **recommends** that the development is implemented in accordance with the following plans and documentation and has **no objection** to the proposed development subject to the inclusion of the following conditions, in consultation with the Lead Local Flood Authority:

Jacobs Preston & South Ribble Scheme Location Plan
drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-PL-0002 Revision P02

Jacobs Preston & South Ribble Scheme Site Layout Plan
drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-PL-0001 Revision P03

Jacobs Preston & South Ribble Scheme General Arrangement
Sheet 1 of 3 drawing no.ENV0000009C-JAC-ZZ-41A-DR-PL-0001 Revision P01
Sheet 2 of 3 drawing no.ENV0000009C-JAC-ZZ-41A-DR-PL-0002 Revision P02
Sheet 3 of 3 drawing no.ENV0000009C-JAC-ZZ-41A-DR-PL-0003 Revision P02

Jacobs Preston & South Ribble Scheme Area 1B General Arrangement
Sheet 1 of 3 drawing no.ENV0000009C-JAC-ZZ-41B-DR-PL-0001 Revision P01
Sheet 2 of 3 drawing no.ENV0000009C-JAC-ZZ-41B-DR-PL-0002 Revision P01
Sheet 3 of 3 drawing no.ENV0000009C-JAC-ZZ-41B-DR-PL-0003 Revision P01

Jacobs Preston & South Ribble Scheme Area 1C General Arrangement
Sheet 1 of 1 drawing no.ENV0000009C-JAC-DZ-41C-DR-PL-0001 Revision P01

Jacobs Preston & South Ribble Scheme Area 1D General Arrangement
Sheet 1 of 1 drawing no.ENV0000009C-JAC-ZZ-41D-DR-PL-0001 Revision P01

Jacobs Preston & South Ribble Scheme Typical Wall Details
Sheet 1 of 1 drawing no.ENV0000009C-JAC-DW-41X-DR-PL-0001 Revision P01

Jacobs Preston & South Ribble Scheme Area 1A Wall Sections and Details
Sheet 1 of 4 drawing no.ENV0000009C-JAC-DZ-41A-DR-PL-0001 Revision P01
Sheet 2 of 4 drawing no.ENV0000009C-JAC-DZ-41A-DR-PL-0002 Revision P01
Sheet 3 of 4 drawing no.ENV0000009C-JAC-DZ-41A-DR-PL-0003 Revision P01

Sheet 4 of 4 drawing no.ENV0000009C-JAC-DZ-41A-DR-PL-0004 Revision P01

Jacobs Preston & South Ribble Scheme Area 1A Long Sections

Sheet 1 of 5 drawing no.ENV0000009C-JAC-DZ-41A-DR-PL-0005 Revision P01

Sheet 2 of 5 drawing no.ENV0000009C-JAC-DZ-41A-DR-PL-0006 Revision P01

Sheet 3 of 5 drawing no.ENV0000009C-JAC-DZ-41A-DR-PL-0007 Revision P01

Sheet 4 of 5 drawing no.ENV0000009C-JAC-DZ-41A-DR-PL-0008 Revision P01

Sheet 5 of 5 drawing no.ENV0000009C-JAC-DZ-41A-DR-PL-0009 Revision P01

Jacobs Preston & South Ribble Scheme Area 1B Sections and Details

Sheet 1 of 7 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0001 Revision P01

Sheet 2 of 7 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0002 Revision P01

Sheet 3 of 7 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0003 Revision P01

Sheet 4 of 7 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0004 Revision P01

Sheet 5 of 7 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0005 Revision P02

Sheet 6 of 7 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0006 Revision P01

Sheet 7 of 7 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0007 Revision P01

Jacobs Preston & South Ribble Scheme Area 1B Long Sections

Sheet 1 of 6 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0008 Revision P01

Sheet 2 of 6 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0009 Revision P01

Sheet 3 of 6 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0010 Revision P01

Sheet 4 of 6 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0011 Revision P01

Sheet 5 of 6 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0012 Revision P01

Sheet 6 of 6 drawing no.ENV0000009C-JAC-DZ-41B-DR-PL-0013 Revision P01

Jacobs Preston & South Ribble Scheme Area 1C Sections and Details

drawing no.ENV0000009C-JAC-DZ-41C-DR-PL-0001 Revision P01

Jacobs Preston & South Ribble Scheme Flood Gate 1 Miller Gardens Apartments

drawing no.ENV0000009C-JAC-DF-41B-DR-PL-0001 Revision P01

Jacobs Preston & South Ribble Scheme Flood Gate 2 Ribble Cottage

drawing no.ENV0000009C-JAC-DF-41B-DR-PL-0002 Revision P01

Jacobs Preston & South Ribble Scheme Area Tie-in Details

Sheet 1 of 3 drawing no.ENV0000009C-JAC-DW-41X-DR-PL-0002 Revision P01

Sheet 2 of 3 drawing no.ENV0000009C-JAC-DW-41X-DR-PL-0003 Revision P01

Sheet 3 of 3 drawing no.ENV0000009C-JAC-DW-41X-DR-PL-0004 Revision P01

Jacobs Preston & South Ribble Scheme Area 2A General Arrangement

Sheet 1 of 2 drawing no.ENV0000009C-JAC-ZZ-42A-DR-PL-0001 Revision P01

Sheet 2 of 2 drawing no.ENV0000009C-JAC-ZZ-42A-DR-PL-0002 Revision P01

Jacobs Preston & South Ribble Scheme Area 2B General Arrangement

Sheet 1 of 3 drawing no.ENV0000009C-JAC-ZZ-42B-DR-PL-0001 Revision P01

Sheet 2 of 3 drawing no.ENV0000009C-JAC-ZZ-42B-DR-PL-0002 Revision P02

Sheet 3 of 3 drawing no.ENV0000009C-JAC-ZZ-42B-DR-PL-0003 Revision P01

Jacobs Preston & South Ribble Scheme Network Rail Underpass GA & Sections

drawing no.ENV0000009C-JAC-ZZ-42C-DR-PL-0001 Revision P01

Jacobs Preston & South Ribble Scheme Area 2 Typical Wall Details

drawing no.ENV0000009C-JAC-DW-42X-DR-PL-0001 Revision P01

Jacobs Preston & South Ribble Scheme Area 2A Sections and Details

Sheet 1 of 3 drawing no.ENV0000009C-JAC-DZ-42A-DR-PL-0001 Revision P02
Sheet 2 of 3 drawing no.ENV0000009C-JAC-DZ-42A-DR-PL-0002 Revision P02
Sheet 3 of 3 drawing no.ENV0000009C-JAC-DZ-42A-DR-PL-0003 Revision P01

Jacobs Preston & South Ribble Scheme Gas Pipe Bridge Sections and Details
drawing no.ENV0000009C-JAC-DG-42B-DR-PL-0001 Revision P02

Jacobs Preston & South Ribble Scheme Area 2B Sections and Details
Sheet 1 of 4 drawing no.ENV0000009C-JAC-DZ-42B-DR-PL-0001 Revision P01
Sheet 2 of 4 drawing no.ENV0000009C-JAC-DZ-42B-DR-PL-0002 Revision P01
Sheet 3 of 4 drawing no.ENV0000009C-JAC-DZ-42B-DR-PL-0003 Revision P01
Sheet 4 of 4 drawing no.ENV0000009C-JAC-DZ-42B-DR-PL-0004 Revision P01

Jacobs Preston & South Ribble Scheme Area 2B Long Sections
Sheet 1 of 3 drawing no.ENV0000009C-JAC-DZ-42B-DR-PL-0005 Revision P01
Sheet 2 of 3 drawing no.ENV0000009C-JAC-DZ-42B-DR-PL-0006 Revision P01
Sheet 3 of 3 drawing no.ENV0000009C-JAC-DZ-42B-DR-PL-0007 Revision P01

Jacobs Preston & South Ribble Scheme Typical Highway Details
Sheet 1 of 2 drawing no.ENV0000009C-JAC-ZZ-00-DR-PL-0001 Revision P01
Sheet 2 of 2 drawing no.ENV0000009C-JAC-ZZ-00-DR-PL-0002 Revision P01

Jacobs Preston & South Ribble Scheme Ribble Sidings Draft Landscape Sketch
drawing no.ENV0000009C-JAC-ZZ-42X-DR-L-0001 Revision P03

Jacobs Preston & South Ribble Scheme Environmental Masterplan Overview
Sheet 1 of 8 drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-L-0002 Revision P04
Sheet 2 of 8 drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-L-0003 Revision P04
Sheet 3 of 8 drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-L-0004 Revision P04
Sheet 4 of 8 drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-L-0005 Revision P04
Sheet 5 of 8 drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-L-0006 Revision P04
Sheet 6 of 8 drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-L-0007 Revision P04
Sheet 7 of 8 drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-L-0008 Revision P04
Sheet 8 of 8 drawing no.ENV0000009C-JAC-ZZ-ZZ-DR-L-0009 Revision P04

Condition 1- Final Detailed Surface Water Drainage Design to be submitted

No development shall commence in any phase until final, detailed surface water drainage design plans showing all the outfalls into the River Ribble for the site have been submitted to, and approved in writing by, the local planning authority, in consultation with the LLFA, Highway Authority and United Utilities.

The development shall be constructed in accordance with the approved details.

Condition 2 – Construction Phase Surface Water Management Plan

No development shall commence in any phase until details of how surface water and pollution prevention will be managed during each construction phase have been submitted to and approved in writing by the local planning authority.

The development shall be constructed in accordance with the approved details.

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