

**Phone:** 0300-123-6780

**Email:** Please contact the Local Planning Authority

**Date:** 04/10/2021

Dear Local Planning Authority,

Thank you for inviting the Lead Local Flood Authority (LLFA) to comment on the below application.

### PLANNING APPLICATION CONSULTATION RESPONSE

<b>Application Number:</b>	21/01028/OUTMAJ
<b>Location:</b>	HM Prison Wymott Moss Lane Ulnes Walton Leyland PR26 8LW
<b>Proposal:</b>	Hybrid planning application seeking: Outline planning permission (with all matters reserved except for means of access, parking and landscaping) for a new prison (up to 74,531.71 sqm GEA) (Class C2A) within a secure perimeter fence following demolition of existing buildings and structures and together with associated engineering works; Outline planning permission for a replacement boiler house (with all matters reserved except for access); and Full planning permission for a replacement bowling green and club house (Class F2(c)) on land adjacent to HMP Garth and HMP Wymott, Leyland

Under the Flood and Water Management Act 2010 the LLFA is the responsible 'risk management authority' for managing 'local' flood risk which refers to flood risk from surface water, groundwater or from ordinary watercourses. The LLFA is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015. It is in this capacity this response is compiled.

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. 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 (LLFA) Position**

The Lead Local Flood Authority **objects** to this application and recommends refusal of planning permission until evidence is provided to demonstrate why those parts of the site that are drained by pumping cannot be drained by gravity.

### **Reason**

Standard S12 of the Non-Statutory Technical Standards for Sustainable Drainage Systems requires that pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

Section 3.5.2 of the proposed surface water drainage strategy report (August 2021, ref: 608623-0000-PEV-GHX0011-ZZ-RP-C-0503, Pick Everard) states that a pumping station will be used for the main site of the development. This is stated to be a "worst case" scenario, however a pumping station is included in the indicative drainage strategy (Drawing Number: 608623-000-PEV-GHX0011-ZZ-DR-C-0511), suggesting that this is the current proposed drainage mechanism for this section of the development. The drainage strategy report fails to provide evidence to demonstrate why this pumping station is required to drain the development site in line with Standard S12 of the Non-Statutory Technical Standards for Sustainable Drainage Systems. This is sufficient reason in itself for a refusal of planning permission.

### **Overcoming Our Objection**

You can overcome our objection by submitting evidence to demonstrate why pumping is required and why the proposed drainage system cannot be drained by gravity.

Production of this evidence and any revised drainage strategy will not in itself result in the removal of an objection.

We ask to be re-consulted with the submitted evidence and the results of any amended drainage strategy. We will provide you with comments within 21 days of receiving formal re-consultation. Our objection will be maintained until adequate evidence has been submitted.

### **Material Changes to this Planning Application**

If there are any material changes to the submitted information which impact on surface water, the local planning authority is advised to consider re-consulting the LLFA. Please send a copy of the decision notice to our mailbox.

### **If you decide to approve contrary to our response**

If the Local Planning Authority grants planning permission for this development contrary to the LLFA's objection, we will be unable to provide comment on the discharge of any surface water or flood risk conditions which we have not recommended.

Yours faithfully,

**Benjamin Rogers**

Lead Local Flood Authority