

**Summary of Representations Received on the
Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) Supplementary Planning
Document (SPD): Scoping
Consultation between 9th June 2022 and 7th July 2022**

Consultee	Key text from representation	Changes sought	Council Response
General			
National Highways	No comments to make		
The Coal Authority	No comments to make		
Lancashire County Council – School Planning Team	No comments to make		
Homes England	No comments to make		
Fairhaven Golf Club	Q1: ‘Yes, I believe it is imperative to do so [produce this SPD] not only for the protection of local residents and their properties, but for businesses such as ourselves who are seeing extended periods of closure due to flooding.’		Comment noted.
NFU North Westpressure is being pace on the system which is meaning that urban water is finding its way into farmers’ fields and causing crop losses. It is pleasing that the consultation recognises that farmland being affected by standing water at certain times of the year, preventing crops from being planted....		Comment noted.

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Resident	Previously, the River Ribble was dredged on a regular basis (when Preston Docks took larger boats and vessels due to silting up). Would this need to be considered for the future to aid water flow. Mindful of the impact on nature.		Comment noted. However, the consideration of dredging the River Ribble is outside the scope of the SPD.
Introduction			
Betts Associates	Q1. Yes, detailed guidance would be useful for ensuring the specific issues/requirements for Fylde are met for new development.		Comment noted.
Fairhaven Golf Club	Q1. Yes, I believe it is imperative to do so not only for the protection of local residents and their properties, but for the businesses such as ourselves who are seeing extended periods of closure due to flooding.		Comment noted.
Environment Agency	Q1. Yes, providing it is focused in its remit and does not cut across or contradict technical guidance or non-statutory standards.		Comment noted. The SPD will support and align with technical guidance and non-statutory standards
Natural England	Q1. Yes. Natural England advise that this is a good opportunity to promote the use of Sustainable Urban Drainage Systems (SuDS) and nature based solutions.		Comment noted.
United Utilities	Q1. We are supportive of the principle of additional guidance on flooding, water management and sustainable urban drainage systems. Whilst being wholly supportive of additional guidance, we wish to note that Lancashire County Council has recently consulted on surface water planning advice. We wish to query whether the issue of surface water management and		It is recognised that flooding is a cross boundary issue and in many ways, a whole county document would be beneficial. However, there are issues that are dependent on the local context and characteristics of the area. These could be missed within a whole county document and are what the Fylde SPD intends to target.

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	the implementation of sustainable drainage systems is more appropriately dealt with in one document which covers the entirety of Lancashire rather than a range of documents at both the County and District levels. That said, with regards to the application of the sequential test, this may be more appropriately dealt with at the local level. We have considered this further below.		
Vision, Issues and Objectives			
United Utilities	<p><u>Issues</u></p> <p>Q2: ‘..we are supportive of the issues you have outlined.’</p> <p>Q3: ‘...we are keen to ensure that the SPD is applicable to the consideration of all forms of flood risk. This includes existing and future flood risk from reservoirs, sewers and surface water.’</p> <p><u>Objectives</u></p> <p>Q4: ‘We are supportive of the above objectives, however, we would suggest that the final bullet point should include reference to the need to comprehensively engage with the water and wastewater undertaker for the area.’</p>		<p>Comment noted.</p> <p>The SPD has acknowledged the flood risk potential from reservoirs, sewers and surface water within the issues section.</p> <p>Noted and added to the final bullet point of the objectives.</p>
Betts Associates	<p><u>Objectives</u></p> <p>Q2: ‘There is no reference to the impacts of climate change within the objectives.’</p>		The objective ‘to mitigate and adapt to the impacts of climate change’ has been added.

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	<p>Q4: 'Amendment to the final bullet point – comprehensive engagement with water companies (United Utilities) may also be beneficial to add given the focus on SuDS.'</p> <p>Q5: 'To identify/outline areas within the borough with existing drainage areas, and where drainage areas are expected in the future. (This would be beneficial as a reference point at pre application stage and may benefit the LLFA as this may help identify opportunities to remediate drainage related issues.)'</p>		<p>Comment noted and document amended.</p> <p>Information on Critical Drainage Areas has been omitted from the SFRA. This is due to the fact that over time areas that are expected to flood do not, and vice versa. Therefore, having this information in a document that can be viewed for a number of years could be misleading. The same approach is viewed as appropriate with the SPD.</p> <p>Although the Council is aware of flooding issues within the Borough, Gov.uk websites where such public domain data is available should be consulted and included as part of a development FRA as this information is updated and adjusted as appropriate by the Environment Agency. All the current guidance on Gov.uk for flooding should still be adhered to.</p>
Historic England	<p><u>Issues</u></p> <p>Q3: • Changing watercourses or groundwater levels may have an impact on the preservation of buried archaeological remains. Any design should take into consideration the impact any changes to water courses, drainage and alterations in water levels may have on buried archaeological assets.</p> <p>• For further information see our Preserving Archaeological Remains guidance which includes sections on water</p>		<p>The comments to both the issues and objectives sections have been taken on board and incorporated in to both sections. The link to further guidance has been added as a footnote (footnote 4) within the SuDS chapter.</p>

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	<p>environments https://historicengland.org.uk/images-books/publications/preservingarchaeological-remains/</p> <ul style="list-style-type: none"> • Mitigation should be dealt with on a case-by-case basis in close consultation with the local authority. Fylde has large areas of alluvial and peat deposits which can contain well preserved palaeoenvironmental evidence and palaeoclimatic data. Designs should incorporate mitigation strategies to reduce the impact of development on buried remains. <p><u>Objectives</u></p> <p>Q4: • To mitigate any risks posed to buried archaeological remains. It is important to consider the impacts SuDS and flood risk mitigation may have on heritage and archaeological assets. Changes to the water quality, levels and changes to the local hydrology can affect the preservation of archaeological remains and steps should be taken to mitigate any impacts from development.</p>		
Fairhaven Golf Club	<p><u>Issues</u></p> <p>Q2: 'Yes, without question.'</p> <p>Q3: 'Having spoken with other local business owners, I feel the most important issues are the movement of water from the region accompanied with the regular maintenance of varying degrees of systems in place.'</p> <p><u>Objectives</u></p>		<p>Comments noted. Poor maintenance of water management systems has been acknowledged as an issue within the Borough and has been promoted as guidance throughout the SPD.</p>

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	Q4: 'Yes, the objectives identified are required.'		
St. Anne's on the Sea Town Council	<p><u>Issues</u></p> <p>Q3: 'Yes, to the condition maintenance of water courses and the use of recycling devices within new developments.'</p> <p><u>Objectives</u></p> <p>Q5: 'Yes to ensure Environment Agency is more honest, open and transparent with the way their statistics are produced.'</p>		<p>Maintenance is a significant issue that is noted within the issues and objectives and guidance regarding the maintenance of water management systems. Generally, landowners with watercourses on their land (Riparian Owners) are responsible for the land drainage of their land.</p> <p>Guidance regarding the use of recycling devices within new developments has been included within the SPD.</p> <p>This is not withing the scope of the SPD.</p>
Environment Agency	<p><u>Issues</u></p> <p>Q3: '• Main rivers and ordinary watercourses are designations rather than sources, so should be removed. • List omits fluvial (river) and tidal flood sources. Note: tidal flood sources can be from rivers and the sea; rivers can be tidally influenced. • Climate change is not specifically mentioned – this will exacerbate flood risks from all sources. • Parts of Fylde are at risk from tidal and fluvial flooding, being in Flood Zone 2 and Flood Zone 3, but river and coastal flooding is not mentioned.'</p> <p><u>Objectives</u></p>		Comments noted and document amended to reflect these.

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	<p>Q5: 'Yes, we would suggest an objective on climate change and flood risk.</p> <p>New developments should be resilient to flooding over their lifetime without increasing risk elsewhere. Where possible flood risk should be reduced overall.</p> <p>The SPD can help achieve objectives that will help development mitigate and adapt to climate change, for example, improve flood risk situations, promote improvements to river channels, promote the use of natural flood management techniques to reduce flooding, and ensure better management of surface water to help to reduce the current causes of flooding.'</p>		Noted. Objectives amended to reflect comments.
Little Eccleston with Larbreck Parish Council	<p><u>Objectives</u></p> <p>Q5: 'I think there are enough already. To be honest I think there are far too many to look at. Perhaps they could be brought into one directive that would be beneficial to the whole county. I'm sure there will be repetition.'</p>		It is recognised that flooding is a cross boundary issue and in many ways, a whole county directive would be beneficial. However, there are issues that are dependent on the local context and characteristics of the area. These could be missed within a whole county document and are what the Fylde SPD intends to target.
Natural England	<p><u>Objectives</u></p> <p>Q4: 'we advise you may wish to strengthen your wording round the objectives and have an emphasis on using nature-based solutions and setting out how these objectives will aid in restoring the natural environment through enhancement of water quality and biodiversity.'</p>		Comment noted. Nature based solutions have been promoted within the objectives of the SPD and subsequently within the SPD as a whole, with the benefits of such approaches recognised.

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	Q5: We advise you may wish to incorporate the use of green infrastructure to manage flooding, water and SuDS.'		Comment noted and added to document.
Legislative and Policy Review			
United Utilities	Q6: 'We suggest that the document should refer to the following guidance on gov.uk: <ul style="list-style-type: none"> - Review individual flood risk assessments: standing advice for local planning authorities; and; - Flood risk assessment: the sequential test for applicants.' 		Comment noted and the guidance is referred to within the SPD.
Betts Associates	Q6: 'Ribble: Catchment Flood Management Plan Wyre: Catchment Flood Management Plan UU Water Resources Management Plan.'		Comment noted and added to the review.
Historic England	Q6: 'Shoreline Management Plan should be consulted.'		Comment noted and added to the review.
St Anne's on the Sea Town Council	Q6: 'House Insurance Claims.'		This is not within the scope of the SPD.

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Environment Agency	<p>Q6: ‘• National Planning Policy Framework (NPPF) – there is no reference to the paragraphs concerning flood risk and coastal (i.e. from 159 onwards). The Council has designated Coastal Change Management Areas – the SPD should reference the relevant parts of the NPPF.</p> <ul style="list-style-type: none"> • The SPD should link to the relevant Planning Practice Guidance. • Sustainable drainage systems: non-statutory technical standards: https://www.gov.uk/government/publications/sustainable-drainage-systems-nonstatutory-technical-standards. • https://thefloodhub.co.uk/ • ADEPT/EA Flood Risk Emergency Plans for New Development ADEPT (adeptnet.org.uk)’ 		Document amended to reflect comment.
Little Eccleston with Larbreck Parish Council	Q6: ‘I am not able to offer that guidance.’		Comment noted.
Lancashire County Council	‘The LLFA have composed a Surface Water Planning Advice Document that is set for publication by the end of Summer 2022. This document will cover similar ground to the Supplementary Planning Document and goes further by specifying the County Council's requirements as Lead Local Flood Authority for Lancashire. The Fylde Supplementary Planning Document should make reference to this Surface Water Planning Advice Document once it is published.’		Comment noted and the Surface Water Planning Advice Document has been added to the SPD.

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Sport England	<p>'We welcome paragraph 4.19 which makes reference to the current local plan policy, Strategic Policy ENV3 Protecting Existing Open Space (part of the Green Infrastructure Network).</p> <p>It would be welcomed if the SPD could expand on this local planning policy objective, as well as specifically explain the importance of existing and proposed playing fields to remain useable throughout the year and that it is not appropriate for these areas to remain waterlogged as this can affect the use of the space and the health and wellbeing of residents. These areas should therefore be positively drained and included in the 'drained area' as part of any development proposal.'</p>		Comment noted and the text providing this guidance has been included under the 'site layout' subheading.
Flood Risk and Location of Development			
United Utilities	<p>Q8: When considering flood risk and the location of development, we believe it is important to highlight that the document should give sufficient emphasis to all forms of flood risk. We request that this section of the SPD includes reference to the definition of flood risk as set out in the National Planning Practice Guidance which states (underlined sections identify our emphasis): [PPG Paragraph: 002 Reference ID: 7-002-20140306 inserted in full response].</p> <p>This section should be clear that the SPD will apply to the risk of flooding from 'overwhelmed sewers' and from 'reservoirs'. We welcome the Council's explanation of the Sequential Test and its alignment to policy CL1 of the Fylde Local Plan. With</p>		It has been made clear that the SPD applies to flood risk from overwhelmed sewers and reservoirs.

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	<p>sewers. Applicants should also refer to the reservoir flood risk map available at gov.uk.</p> <p>With respect to sewer flood risk, this should include consulting with the wastewater undertaker to understand:</p> <ul style="list-style-type: none"> a) if there are any sewerage surcharge levels at the point of connection that could influence site design; b) whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and c) if sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding to the proposed development site. <p>This consultation will inform the Local Planning Authority of whether there is a need to apply the sequential approach to new development proposals. In all cases, applicants will need to demonstrate that the proposed development would be safe and not lead to increased flood risk elsewhere e.g. through careful masterplanning of a site. Applicants should not assume that changes in levels or any proposed diversion of the public sewerage system will be acceptable as such proposals could increase flood risk.'</p> <p>In the context of the application of the sequential test, we suggest that more detailed guidance should be provided on how this will be applied at the local level. Such an approach has recently been proposed by Lancaster City Council in their recent consultation document 'Draft Flood Risk – Sequential Test and Exception Test Supplementary Planning Document.'</p>		<p>Now that the SPD has progressed to draft version, there is now guidance on how the sequential test should be applied at local level. This includes guidance on the area of search and reasonably available alternative sites.</p>

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Betts Associates	<p>Q7: Yes. Exceptions should be made for development areas that can be made safe without increasing flood risk to others.'</p> <p>Q8: As noted previously, it would be useful to have some guidance on Critical Drainage Areas. Whether these are relevant, or not relevant to Fylde. If these are to be applied to Fylde how should these be addressed? What information is available to identify whether a specific site is within a CDA?</p> <p>If CDA's are identified, does this relate to the requirement of an FRA?'</p>		<p>Information on Critical Drainage Areas has been omitted from the SFRA. This is due to the fact that over time areas that are expected to flood do not, and vice versa. Therefore, having this information in a document that can be viewed for a number of years could be misleading. The same approach is viewed as appropriate with the SPD.</p> <p>Although the Council is aware of flooding issues within the Borough, Gov.uk websites where such public domain data is available should be consulted and included as part of a development FRA as this information is updated and adjusted as appropriate by the Environment Agency. All the current guidance on Gov.uk for flooding should still be adhered to.</p>
Environment Agency	<p>Q8: 5.2 • Flood risk vulnerability classification – although it remains, Table 2 of the PPG has been superseded by Annex 3 of the NPPF, as such it is now policy as opposed to guidance: National Planning Policy Framework - Annex 3: Flood risk vulnerability classification - Guidance - GOV.UK (www.gov.uk).</p> <p>5.3: • Error with terminology – Flood Zone 3a is not functional floodplain, Flood Zone 3b is designated functional floodplain and has a high probability of flooding.</p> <p>• Flood Zone 3 is split into 3a and 3b, where the LPA has designated Flood Zone 3b for planning purposes through the Strategic Flood Risk Assessment (SFRA). The Environment</p>		<p>Comment noted and corrected in document.</p> <p>Noted. The terminology has been amended.</p>

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	<p>Agency is not responsible for designating Flood Zone 3b and it is not defined on the Flood Map for Planning (rivers and sea).</p> <ul style="list-style-type: none"> • See: https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-1-FloodZones <p><u>Sequential and exception tests</u></p> <p>The SPD should include clarification regarding sequential test and exception test responsibilities. Below is standard advice to LPAs that we include in response to applicable planning application consultations – this could be adapted for the SPD: [Text included on Sequential and Exception Tests].....</p> <p>We recommend the SPD also includes this link: Flood risk assessment: the sequential test for applicants - GOV.UK (www.gov.uk)</p> <p><u>Site-specific flood risk assessments</u></p> <p>This section should mention where flood risk data can be obtained, e.g. Environment Agency, your Council's SFRA, and sign-post to the relevant mapping, e.g. Flood Map for Planning (rivers and sea) and flood risk maps on GOV.UK. Note that developers can now request Product 4 flood risk data (e.g. modelled flood levels, extents and asset information) via the Flood Map for Planning Service.</p> <p>5.12: • These links should be included: Flood risk assessments if you're applying for planning permission - GOV.UK (www.gov.uk); https://www.gov.uk/guidance/flood-risk-and-coastal-change#Site-Specific-FloodRisk-Assessment-checklist-section</p>		<p>The text provided in the full response contains the same information as the text provided in the full response.</p> <p>All recommended links have been included.</p>

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	<ul style="list-style-type: none"> The link provided (Preparing a flood risk assessment: standing advice - GOV.UK (www.gov.uk)) is targeted at planning applications where Flood Risk Standing Advice (FRSA) would apply (and the Environment Agency would not be consulted on/provide advice on such developments). <p>The latest guidance on how to apply the correct, up to date climate change allowance for FRAs is available on the gov.uk website at https://www.gov.uk/guidance/flood-riskassessments-climate-change-allowances</p> <p><u>Pre-application advice</u></p> <p>Developers should be encouraged to request pre-application advice from the Environment Agency – we can provide a free high level preliminary opinion (information on the site-specific environmental issues raised by the proposal which will help developers understand any concerns we have) and detailed planning advice (e.g. reviewing FRAs/plans prior to submission to the LPA), which is chargeable.</p> <p>Pre-planning application enquiry form (preliminary opinion) - GOV.UK (www.gov.uk)</p> <p>Charged environmental advice service request form - GOV.UK (www.gov.uk)</p> <p><u>Householder development</u></p> <ul style="list-style-type: none"> Householder development run off issues not confined to Flood Zones 2 and 3. The creation of impermeable surfaces, regardless of flood zone, compounds surface water flooding and water quality issues. 		<p>Noted. The link to the Flood Risk Standing Advice in relation to the Environment Agency has been removed and replaced with para 5.35 which guides readers to the Site Specific Flood Risk Assessment checklist and the climate change allowances.</p> <p>Noted. The links suggested were highly relevant and have thus been included in the pre-application advice section.</p> <p>The Council understands and wholly agrees that householder development issues are not confined to Flood Zones 2 and 3. However, there is an increased risk presented within Flood Zones 2 and 3. Due to this it is</p>

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	<ul style="list-style-type: none"> Provide link to Flood Risk Standing Advice (which includes advice for minor extensions). 		<p>proposed that applications for householder development within those locations submit a drainage statement.</p> <p>The suggested link has been provided.</p>
St. Anne's on the Sea Town Council	Q8: House Insurance Valuations.		This is not within the scope of the SPD.
Little Eccleston with Larbreck Parish Council	<p>Q7. Completely.</p> <p>Q8: 'As much as possible that could help residents to either mitigate flooding or help them choose where they live.'</p>		Comments noted.
Managing and Mitigating Flood Risk			
Betts Associates	Q9. Yes. NFM may not be suitable in all cases and details of specific mitigation.		Comment noted. The suitability of NFM will be assessed as part of the planning process.
NFU North West	<p>....we would support the ambition of the document to minimise the risk of surface water flooding, coastal and pluvial flooding and groundwater flooding, to existing and new development and to agricultural land, as well as asking developers to take action to protect all agricultural land.</p> <p>With respect to the adoption of natural flood management techniques, agriculture is currently going through the greatest period of change since the second world war as we have left the EU and agriculture policy will be developed and</p>		Comments noted.

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	<p>delivered on a national basis. The new ELM scheme is based on a principle of public money for public goods and the role that agricultural land can play in food mitigation has been recognised. Many activities on farm can help alleviate flooding downstream such as reducing soil compaction, tree planting and increasing soil permeability. Larger scheme can be developed which involve storing water temporarily on agricultural land. NFM schemes should be developed in partnership with farmers and should also be properly funded. It is particularly key to developing approaches whereby farmers are paid to maintain NFM assets on their land which benefit downstream communities and that the liability for these structures is addressed, in the event that they fail to operate in the way they are intended to do so.</p> <p>In conclusion, a condition should be place on the developers to make sure that any development does not increase the flood risk of neighbouring farm land. This should include a requirement that a significant investment is made in upgrading the sewer system to cope with the extra demands being placed upon it and that a contribution is made to the maintenance of the farmland drainage channels which are receiving this urban water.</p>		<p>There is a general requirement on all development to not increase flood risk elsewhere (para 167 of NPPF). Therefore, it is a key requirement of all developments that this is assessed, and conditions are imposed on the planning permission to ensure that any drainage requirements are introduced and appropriately maintained. United Utilities review all applications and would highlight where there are issues with sewer access and capacity, and it is possible for a developer to be required to upgrade them if that is necessary to enable the development to proceed, with Policy INF2 of the FLPPR. It is not possible to require that a development provides contributions towards the upgrade of drainage ditches in the area as this is the responsibility of the relevant landowner, and with the surface water that leaves a site being restricted to the previous rate anyway</p>

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			these ditches would not see any extra demands in terms of either volume of water or rate of flow.
Resident	<p>On reviewing this I feel extra efforts needs to be considered with the way the Fylde area, Farmers and local authorities look at Open Dikes, Field drainage and connections into dikes that feed into the River Ribble/River Wyre. These need to be regularly maintained, cleared of debris. All these will help to maintain a good run off to aid the sustainable drainage system across the Fylde.</p> <p>Working together with Local/New Developers to ensure that improvements to the Current Drainage systems (Sewerage/Rain water roads and Drainage), as some of these are very old and certainly not of an adequate size for the current situation and the pending future,. More house means MORE Rain water into the drainage systems. We may also require HOLDING TANKS or system of this kind to alleviate flooding.</p>		<p>It is the responsibility of the riparian owners to ensure maintenance of their own watercourse. The Environment Agency are responsible when the watercourses obtain Main River standard and so this cannot be targeted within the scope of the SPD.</p> <p>There is a general requirement on all development to not increase flood risk elsewhere (para 167 of NPPF). Therefore, it is a key requirement of all developments that this is assessed, and conditions are imposed on the planning permission to ensure that any drainage requirements are introduced and appropriately maintained. United Utilities review all applications and would highlight where there are issues with sewer access and capacity, and it is possible for a developer to be required to upgrade them if that is necessary to enable the development to proceed, with Policy INF2 of the FLPPR.</p>
Natural England	<p>Q. 10 Natural England welcome the inclusion of green infrastructure and natural flood management. You should look to emphasise that natural flood management should be considered in the first instance including the use of natural based solutions wherever practical.</p> <p>We advise you may wish to incorporate wider opportunities to support the management and mitigation of water</p>		The Council agree and support the notion that green and blue infrastructure should be integrated into a development at every possible opportunity. The SPD also acknowledges that opportunities to retrofit green infrastructure into urban environments will be looked upon favourably.

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	<p>management and the wider biodiversity of the area through green infrastructure . This can be done through incorporating green features on sites such as open spaces, ponds and trees.</p> <p>There may also be significant opportunities to retrofit green infrastructure in urban environments through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). 		<p>The opportunities provided within the response to the scoping consultation have all been added to the draft version of the SPD.</p>
Environment Agency	<p>Yes, as it would provide developers have the necessary guidance so they can ensure their planning proposals properly address the issues from an early stage and so they are aware of the potential concerns the LPA and consultees are likely to have.</p> <p>For development to be sustainable it must be designed to cope with flooding that is expected to occur throughout its lifetime. We would recommend the following approach (carried out in order) for managing the risk of flooding to new developments.</p> <ol style="list-style-type: none"> 1. Avoid developing in areas of flood risk wherever possible; 2. Put the most vulnerable uses in the areas with the lowest flood risk within a site; 3. Control risks at a site level, for example, site layout, existing flood defences; and 4. Mitigate remaining risks at a building level, such as; <ul style="list-style-type: none"> • Avoid internal flooding wherever possible and reasonable to do so e.g. through raised floor levels; 		<p>Comments noted and agreed. The guidance provided within the response to the scoping consultation is covered throughout the SPD, especially in relation to producing sustainable development. The text on site layout and culverting has been included.</p>

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	<ul style="list-style-type: none"> • Mitigate through flood resistant, resilient and repairable construction (in that order) • Mitigate impacts through non-structural measures such as emergency planning. <p>Site layout</p> <p>In addition to flood risks, site layouts should take account of watercourses – this also links to green infrastructure and natural flood management.</p> <p>Land alongside watercourse is particularly valuable for wildlife and it is essential this is protected as development that encroaches on to it has a potentially severe impact on their ecological value. Retaining and enhancing coherent ecological networks adjacent to watercourses will help to ensure the biological and chemical quality of watercourses is not reduced as a result of development, which is a requirement of the Water Framework Directive.</p> <p>We recommend that a clear, unobstructed buffer between the edge of the watercourse and the proposed development is incorporated into the layout of the proposed development. The buffer zone shall be free from built development, including lighting, domestic gardens and formal landscaping.</p> <p>For maximum biodiversity benefit, the site layout should use watercourse(s) on site as a feature rather than a constraint. Watercourses can be integrated into the layout as a positive</p>		

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	<p>feature by locating new built development in positions that overlook watercourses and including them within areas of public open space rather than hiding them behind gardens and fences.</p> <p>Integrating watercourses into a site as a positive feature will not only provide a better environment, but it could also provide social and economic benefits, such as contributing to green infrastructure provision and/or enhancement and potentially increasing the economic value of a development.</p> <p>Environmental Permitting (England and Wales) Regulations 2016 – Developers should be aware that if the development of the site involves any activity within specified distances of main rivers, a flood risk activity permit from the Environment Agency may be required in addition to planning permission. For non-tidal main rivers, a flood risk activity permit may be required if the development of the site is within 8 metres of a river, flood defence structure or culvert. For tidal main rivers, a flood risk activity permit may be required if the development of the site is within 16 metres of a river, flood defence structure or culvert. Further details are available here:</p> <ul style="list-style-type: none"> • GOV.UK: Flood risk activities: environmental permits - GOV.UK (www.gov.uk). • Main river mapping: Statutory Main River Map (arcgis.com) • Flood risk asset mapping (e.g. flood defences & maintenance; FCERM schemes) Asset Information and Maintenance Programme (data.gov.uk). 		

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	<p>The Environment Agency usually requires that an 8 metre wide, unobstructed strip is retained next to the main river for access and maintenance to the watercourse. We may require the full 16 metre wide access strip next to tidal main rivers or tidal flood defences. New buildings, walls, private gardens, landforms, and other features/structures which restrict access to the watercourse are unlikely to be permitted by the Environment Agency.</p> <p>Works affecting non-main river watercourses may require the prior consent of the Lead Local Flood Authority (Alterations to a watercourse - Lancashire County Council).</p> <p>Floor levels in residential and non-residential development We would suggest having a section on flood risk mitigation (resistance and resilience measures) rather than splitting out a section on floor levels. 6.8: Footnote acknowledged, but more specific detail needs to be provided on setting finished habitable floor levels. The design flood event should be referred to: https://www.gov.uk/guidance/flood-risk-and-coastal-change#design-flood</p> <p>Culverting</p> <p>We agree with 6.10.</p> <p>Culverting works against the natural processes of watercourses. It can exacerbate the risk of flooding and increase maintenance cost and complexity. It can also</p>		

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	<p>destroy wildlife habitats, hinder fish passage, reduce amenity value, interrupt the continuity of the linear corridor of a watercourse and can affect channel stability. It can also significantly reduce resilience to the effects of drought, floods and pollution.</p> <p>Detrimental effects of culverting watercourses can include:</p> <ul style="list-style-type: none"> • increased likelihood of flooding due to their limited capacity and propensity for blockage, both of which can result in obstructions to flow, and loss of floodwater storage; • exacerbating the nature of flooding by increasing flow velocities and speed of onset; • loss of and adverse effects on morphology, fisheries and wildlife habitat including substrate; • if present, adverse effects on protected species; • the creation of barriers to fish passage through increased water velocities, behavioural deterrent, shallow depths, darkness, oxygen depletion and eroded culvert entrances; • increased geomorphological risk including changes to channel stability, river bank and bed erosion and increased deposition around the culverted sections; • greater difficulties in providing for drainage connections; • increased liabilities and costs due to the need to maintain, repair and replace culverts or to manage upstream and downstream risks; • increased health and safety hazards, notably for workers clearing blockages and for children in urban areas; • locally reduced groundwater recharge; • increased difficulty in detecting the origins of pollution and in monitoring water quality; 		

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	<ul style="list-style-type: none"> • reduced resilience for communities and wildlife to the effects of extreme weather events, climate change and acute pollution. <p>In addition to avoiding the detrimental effects of new culverting listed above, the restoration of river corridors by removing or opening sections of existing culverting and restoring natural river beds and banks can have wider benefits, including:</p> <ul style="list-style-type: none"> • providing habitat for wildlife and improving its connectivity; • providing additional flood storage capacity and slowing flows; • ameliorating the urban heat island effect; • providing areas for recreational use; • improving amenity, health and educational opportunities; • increasing property prices and their desirability; • reducing maintenance costs and improving safety. <p>Responsibilities regarding main rivers and ordinary watercourses should be clarified. Any culverting of a watercourse, or the alteration of an existing culvert:</p> <ul style="list-style-type: none"> • on main rivers, requires a flood risk activity permit from the Environment Agency under the Environmental Permitting Regulations 2016. • on all other watercourses, except within the district of an internal drainage board (IDB), requires a land drainage consent under Section 23 of the Land Drainage Act 1991 from the Lead Local Flood Authority (LLFA). 		

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	<p>Safe access and egress routes ‘</p> <p>Safe' access and egress should mean dry in the design flood. This is also related to flood hazard. It is not our role to comment on whether the proposed access and egress arrangements are ‘safe’ in relation to development proposals. However, to help the LPA in coming to a decision on planning applications, we can provide advice on the technical aspects related to flood hazard rating, speed of onset, flood depths, velocities, duration and the availability of a flood warning service, and remind LPA of the need to consult the emergency planners on the appropriateness of flood warning evacuation proposals. Also see ADEPT/EA Flood Risk Emergency Plans for New Development ADEPT (adeptnet.org.uk).</p> <p>Green and Blue Infrastructure (GBI) and Natural Flood Management (NFM)</p> <p>Developers should be aware that a permit is required from the Environment Agency where flood risk activities are proposed within specified proximities of main rivers (including culverts) and flood defences. We are unlikely to grant consent where access is restricted.</p> <p>Suggest including examples of NFM (for example, see Flood Hub for guidance) and GBI with multiple benefits for people and wildlife.</p>		

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	<p>6.16 – should be incorporated in flood resistance and resilience section (see above and Q10 below).</p> <p>This should be informed by/sign-post to available guidance on GOV.UK, etc (see above). Also see, Flood Hub website.</p> <p>Q 10. Suggest merging floor levels and flood resilient construction, as they are both forms of mitigation. Suggest having a section on flood risk management which incorporates safe access and egress. Suggest a section on surface water management/disposal which incorporates SuDS. Link GBI and NFM with SuDS.</p> <p>Q12: Appendices can be updated as and when guidance changes. It may be better to locate technical design criteria to appendices.</p>		
Sport England	<p>It would be welcomed if the SPD could expand on this local planning policy [Policy ENV3] objective, as well as specifically explain the importance of existing and proposed playing fields to remain useable throughout the year and that it is not appropriate for these areas to remain waterlogged as this can affect the use of the space and the health and wellbeing of residents. These areas should therefore be positively drained and included in the ‘drained area’ as part of any development proposal.’</p>		<p>Comment noted and the text providing this guidance has been included under the ‘site layout’ subheading.</p>

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Network Rail	<p>The document should include consideration of the impacts of drainage, surface water on the existing operational railway / Network Rail land as a specific issue.</p> <p>Drainage proposals and Network Rail land</p> <p>The NPPF states:</p> <p><i>"178. Planning policies and decisions should ensure that:</i></p> <p style="padding-left: 40px;"><i>a) A site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability."</i></p> <p>And</p> <p><i>"163. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere."</i></p> <p>In order to comply with the NPPF, developments must ensure that the proposal drainage does not increase Network Rail's liability, or cause flooding pollution or soil slippage, vegetation or boundary issues on railway land. Therefore, the proposed drainage on site will include the following:</p> <ul style="list-style-type: none"> • All surface waters and foul waters must drain away from the direction of the railway boundary. • <u>Soakaways for proposals must be placed at least 30m from the railway boundary and at least 50m from railway tunnels (subject to Network Rail agreement).</u> • Any drainage proposals for less than 30m from the railway boundary must ensure that surface and foul 		<p>Noted and agreed. The draft SPD has been produced in full alignment with the Fylde Local Plan to 2032 (incorporating Partial Review) and thus the NPPF is focussed on not increasing flood risk elsewhere.</p> <p>Network Rail are a statutory consultee and would be consulted on any planning application with the potential to impact on Network Rail land.</p>

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	<p>waters are carried from site in closed sealed pipe systems.</p> <ul style="list-style-type: none"> • Suitable drainage or other works must be provided and maintained by the developer to prevent surface water flows or run-off onto Network Rail's land and infrastructure. • Proper provision must be made to accept and continue drainage discharging from Network Rail's property. • Developers must ensure that there is no surface or sub-surface flow of water towards the operational railway. • Rainwater goods must not discharge in the direction of the railway or onto or over the railway boundary. • Consideration of the impacts upon railway drainage of Astro-Turf/plastic lawn replacements, both during construction and any future inclusion of said Astro-turf by residents going forward. <p>NB: Soakaways can materially affect the strength of soil leading to stability issues. A large mass of water wetting the environment can soften the ground, and a build-up of water can lead to issues with the stability of Network Rail retaining walls/structures and the railway boundary. Network Rail does not accept the installation of soakaways behind any retaining structures as this significantly increases the risk of failure and subsequent risk to the travelling public.</p> <p>If developers and the council insists upon a sustainable drainage and flooding system then the issue and responsibility of flooding, water saturation and stability</p>		

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	<p>issues should not be passed onto Network Rail. We recognise that councils are looking to proposals that are sustainable, however, we would remind the council that flooding, drainage, surface and foul water management risks as well as stability issues should not be passed '<i>elsewhere</i>', i.e. on to Network Rail land.</p> <p>All drainage proposals are to be agreed with Network Rail.</p> <p>The HSE identifies railways as a Major Hazard Industry. An earthwork failure within a high-hazard area has the potential to result in a catastrophic accident with multiple fatalities or long-lasting environmental issues. It should be noted that where the actions of an adjacent landowner have caused a landslide on the railway the loss adjusters are likely to advise recovery of Network Rail costs from the 3rd party, which would include costs of remediation and recovery of costs to train operators. Many railway earthworks were constructed in the Victorian period and are susceptible to failure by water saturation. Water saturation leads to an increase in pore water pressure within the earthwork material. Please also note that railways, and former railway land adjacent to it, is considered as contaminated land due to historic use of railways, which can affect the suitability of infiltration drainage.</p> <p>The Council must ensure that suitable arrangements are in place for the maintenance and renewal of all new/amended drainage for the life time of the development, to mitigate risk of flooding to any adjoining land.</p>		

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	<p>Drainage works must not impact upon culverts, including culverts/brooks etc that drain under the railway. Developers will not be permitted to direct surface or foul waters into culverts which run under the railway – any discharge of surface water under the railway via a culvert will require review and agreement from Network Rail who reserve the right to refuse use of any culverts.</p> <p>New detention ponds or increased discharge to a detention pond adjacent to the railway would not be acceptable due to the risk of destabilising earthworks due to potential for softening of the railway embankment, and due to the increased risk of causing flooding to the railway. Attenuation basins or ponds must not be positioned in developments where the development is adjacent to a cutting.</p> <p>Developers are advised that prior to the submission of a planning application that they contact the Network Rail asset protection team in the first instance with details of their proposals for surface water mitigation for review and agreement. No surface water works are to commence until agreed with Network Rail.</p>		
United Utilities	<p>Yes we believe that detailed guidance should be provided on the measures listed.</p> <p>United Utilities wishes to highlight its support for guidance on sustainable flood risk management. Sustainable flood risk</p>		Comments noted. Changes have been made to the SPD.

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	<p>management should be critical elements of the design and development process.</p> <p>In considering the information that is necessary to support an application for planning permission, we request that the SPD is clear that submission material should include both a sustainable surface water drainage strategy and a foul water drainage strategy. The submission of both these documents are key to assessing the risk of sewer flooding to a proposed development. The matter is most appropriately covered in a composite document relating to drainage. We request that all applications are required to submit drainage details as part of their submission material.</p> <p>The SPD should be clear that the approach to drainage should be considered early in the design process as the delivery of a sustainable approach to drainage will be material to site design. For example the use of a private soakaway on a small infill plot will be material to the design of the site as adequate space will need to be maintained to ensure that the soakaways can be accommodated on site, for example, within appropriately sized garden areas to ensure that there is an adequate off-set from the proposed dwellings.</p> <p>On sites that are part of a wider allocation / development, the SPD should be clear that applicants will need to demonstrate how the site drainage strategy (both foul and surface water) fits with the wider development proposals to ensure that a sustainable approach to drainage is not</p>		<p>Comments noted. Applicants are required to submit drainage details as part of their application and this will be assessed as part of the planning process.</p> <p>Comment noted and agreed. The importance of early consideration of drainage matters is promoted within the draft SPD.</p>

Consultee	Key text from representation	Changes sought	Council Response
	<p>compromised by virtue of a fragmented approach to delivery.</p> <p>We also request that the SPD clearly explains that:</p> <ul style="list-style-type: none"> i) it is in the applicant's interest to ensure that a point of outfall is secured as soon as possible; and ii) the acquisition of a right to discharge and the right to lay and maintain any associated drainage pipes should be a key consideration in the acquisition of a site / completion of an agreement to promote a site for development. <p>We also recommend that additional guidance is provided on finished floor and ground levels in the context of connection to the public sewer. In accordance with our above comments, it will be critical that the applicant consults with the sewerage undertaker to understand if there are any sewer surcharge levels at the point of connection that could influence site design both in terms of ground levels and finished floor levels. Where the ground level of a site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer. Where there is a risk of sewer surcharge, additional careful</p>		

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	<p>consideration will need to be given to site levels and whether there is a need to incorporate of mitigation measures to manage the risk of sewer flooding.</p> <p>It is also good practice to ensure that the external levels fall away from the ground floor level of proposed buildings (following any regrade) to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows.</p> <p>We request that the SPD explicitly refers to both natural and artificial drainage features including sewers. Natural and existing artificial drainage features on sites must be identified and mapped so that they can be protected and integrated with the SuDS and wider integrated water management on the site to help reduce the causes and impacts of flooding in line with the National Planning Policy Framework. This can also help meet other environmental targets such as Biodiversity Net Gain.</p> <p>Natural features include:</p> <ul style="list-style-type: none"> • ephemeral or perennial watercourses, including existing ditches; • overland flow routes; • floodplains; • wetlands; • permeable areas (e.g. sands and gravels); • zones of high water table; • natural depressions; • steep slopes; and 		

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	<ul style="list-style-type: none"> • areas of peat. <p>Site layouts should be designed around these features to ensure they are protected. Buildings should not be constructed over existing drainage features, including field drains, without specific alternative flow routing capacity being provided.</p> <p>It is important to acknowledge that like watercourses, some public sewers will be at a higher risk of flooding and therefore these locations should also be avoided as locations for development in accordance with national planning policy. Any existing sewer flood risk should be not displaced as a result of development occurring, for example, via a proposed diversion or increase in site levels. The SPD should clearly state that a diversion of a public sewer could increase flood risk, either on-site or off site, and therefore applicants should not assume that a diversion will be approved by the wastewater undertaker in preparing their layout.</p> <p>The SPD should clearly reference the need to have regard to areas at risk of surface water flooding. Such other sources of flood risk should not be displaced by new development. In particular, it should not be directed towards existing customer properties or the highway which will connect with the highway drainage system. This in turn will often indirectly connect with the public sewerage system and increase flood risk. We request that the SPD identifies the need to fully consider exceedance flows as a key design principle for sewers, sustainable drainage systems and existing natural and artificial drainage features.</p>		

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	<p>With respect to steep slopes, we request that the SPD includes a specific section which identifies that on sloping sites an assessment of the natural drainage patterns for the site and any existing flow paths and discharge points will be especially important. The assessment will need to determine how these are likely to be modified by the development proposal and identify mitigating measures to protect proposed and existing properties from flood risk. The assessment should demonstrate that existing flow paths are not displaced. The advice should clearly state that steeply sloping sites can suffer from sub-soil drainage issues. These steeply inclined sites can have existing ground water problems due to underground springs. Such issues must be considered when designing a site. There is a risk that groundwater / overland flow could overload the drainage system that is designed as a result of illegal connections being made as an afterthought by individual residents if their plots are not drained effectively.</p> <p>With regards to Natural Flood Management Techniques, whilst we welcome any such approaches, it will be important to ensure access is secured for maintenance purposes such as maintenance of existing outfalls</p>		
Sustainable Urban Drainage Systems (SuDS)			
Lancashire County Council	When Sustainable Urban Drainage Systems are planned it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the		Noted and relevant information has been added to the draft SPD.

Consultee	Key text from representation	Changes sought	Council Response
	local historic environment following consultation with the Lancashire Historic Environment Record (HER) and by taking relevant expert advice. Lancashire County Council maintains the County HER and its Historic Environment Team can offer guidance on avoiding damage to the County's heritage.		
Network Rail	If developers and the council insists upon a sustainable drainage and flooding system then the issue and responsibility of flooding, water saturation and stability issues should not be passed onto Network Rail. We recognise that councils are looking to proposals that are sustainable, however, we would remind the council that flooding, drainage, surface and foul water management risks as well as stability issues should not be passed ' <i>elsewhere</i> ', i.e. on to Network Rail land.		Noted. This will be considered as part of the planning process. Network Rail are a statutory consultee and would be consulted on any planning application with the potential to impact on Network Rail land.
United Utilities	<p>Q12. Yes we support the inclusion of the design principles you have outlined.</p> <p>Q13. As noted at paragraph 7.15 of the consultation document and outlined in 'Building for a Healthy Life', we support the inclusion of the reference to the 'four pillars' of sustainable drainage systems i.e., water quantity, water quality, amenity and biodiversity.</p> <p>We also request that the application of the surface water hierarchy should not be confused with wider application of a preference for sustainable drainage features which are multifunctional.</p>		<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. It is considered that the distinction is made within the draft SPD.</p>

Consultee	Key text from representation	Changes sought	Council Response
	<p>design process to identify opportunities for landscaping to be integrated with sustainable surface water management. It should identify SuDS opportunities such as:</p> <p>- green roofs; - permeable surfacing; - soakways and filter drainage; - swales, including retrofitted swales; - bioretention tree pits/rain gardens; - basins and ponds; and - reedbeds and wetlands.</p> <p>Any drainage system should be designed in accordance with 'Ciria C753 The SuDS Manual' or any subsequent replacement guidance.'</p> <p>Water Efficiency</p> <p>We recommend that there is a clear and separate section on the surface water management hierarchy and this should include water re-use as the first priority. In a future local plan review, we request the inclusion of a policy relating to the optional water efficiency standard to ensure that all new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day. Additionally, we would request that any new dwelling should incorporate a water butt. We would recommend that non-domestic buildings will be expected to achieve a BREEAM rating of 'Excellent'. We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reductions noting that water and energy</p>		<p>Comments noted. This comment is in reference to a Local Plan Review. However, the SP provides guidance that supports the re-use of water as first priority.</p>

Consultee	Key text from representation	Changes sought	Council Response
	<p>be clear that local circumstances may dictate that a higher level of betterment will be required.</p> <p>Biodiversity Net Gain</p> <p>We wish to note that the SPD should explain that in implementing SuDS and the delivery of Biodiversity Net Gain (BNG), it is important to ensure that access is maintained to existing utility assets. It will not be appropriate to locate SuDS or BNG on the top of existing utility assets as access for maintenance, repair and renewal must be maintained.</p> <p>Groundwater Protection Zones</p> <p>We wish to emphasise that the location of a development site in a Groundwater Source Protection Zone is a matter which is relevant to the consideration of the principle of development, the masterplanning of a site and detail of the proposed approach to drainage. Such locations will need to be considered in the context of the acceptability of the proposed use, the proposed foul and surface water drainage systems and whether additional protection measures are required to protect the groundwater environment, and the potential risk of mobilisation of contaminants. As such, it should be clear in the SPD that in Groundwater Source Protection Zones, it will be necessary to consider the approach to development in accordance with wider government advice including the latest advice from the Environment Agency. This includes 'The Environment Agency's Approach to Groundwater Protection' (February</p>		<p>Comment noted and agreed. The benefits of SuDS in providing BNG is focussed upon strongly within the draft SPD and with this, appropriate guidance is provided on maintenance. This includes a reference to the fact SuDS should not have an adverse effect on access points to other utility points within the bulleted list in paragraph 7.9.</p> <p>It is made clear within the draft SPD that the applicant should consult with the relevant water undertaker in addition to the Environment Agency and LLFA.</p>

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	<p>2018 Version 1.2). It should also be clear in the SPD that the applicant should consult with the relevant water undertaker in addition to the Environment Agency</p> <p>Q14 Yes we believe examples of SuDS techniques would be helpful. We would suggest some high quality example case studies of what you would expect to see as a local planning authority.</p> <p>Q15 Yes we are supportive of the use of the SuDS proforma.</p> <p>Q16 We wish to note that if United Utilities adopts a SuDS, there are still shared responsibilities for maintenance as land ownership is not within the responsibility of United Utilities. United Utilities will not carry out general landscaping activities such as grass cutting, on adopted SuDS components. As such, we would suggest that the LPA should review and be happy with the operation and maintenance manual in all circumstances, particularly with regard to any landscaping and planting that have been submitted as part of the agreed submission. As such a management and maintenance condition will be required for all sites.</p> <p>Due to the voluntary basis for adoption in England and the different options for developers we would recommend that the LPA are provided with verification information in all circumstances, there is risk that developers can and do change the adoption route throughout the development lifecycle. Sometimes adoption does not occur even if intended originally by the developer, this way there will be</p>		<p>This is outside the scope of the SPD but issues of this nature will be assessed and refined through the planning process.</p>

Consultee	Key text from representation	Changes sought	Council Response
	<p>consistency to verifying the surface water strategy and SuDS design is in accordance with the original approval.</p> <p>We also request that the section on SuDS operation and maintenance is clear that changes in the companies / authorities responsible for management and maintenance will need to be clearly communicated and registered with the LPA.</p> <p>We wish to note that the SPD should clearly state that it will not be acceptable for on-site watercourses to be subject to maintenance regimes associated with fragmented riparian ownership. Applicants will need to demonstrate on-site watercourses are the subject of a clear and co-ordinated management and maintenance regimes both during development and following completion.</p>		
Environment Agency	<p>Q13: Maintenance principals need to be considered. Basins and ponds accumulate silts which may include rubber and hydrocarbons. Some operations may produce hazardous wastes.</p> <p>Cutting and mowing regimes need to be sensitive to carbon footprint but also to biodiversity. SuDs features can attract ground nesting birds. Planting should encourage and be managed for the benefit of pollinators.</p>		<p>Noted. It is the responsibility of the developer to ensure that a suitable maintenance management plan is provided for future maintenance for any proposed drainage ensuring that an adequate maintenance model can be implemented. The process outlined within the SPD is considered to be sufficient to adequately address these concerns. As part of the planning process, relevant conditions will be recommended where appropriate to ensure sufficient detail is provided at the reserved matters stage.</p>

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	<p>Approved Document Part H of the Building Regulations 2010 establishes a hierarchy for surface water disposal, and encourages a SuDS approach. The first option for surface water disposal should be the use of SuDS, which encourage infiltration such as soakaways or infiltration trenches. In all cases, it should be established that these options are feasible, can be adopted and properly maintained and would not lead to any other environmental problems. For example, using soakaways or other infiltration methods on contaminated land carries groundwater pollution risks and may not work in areas with a high water table. Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365. Further information on SuDS can be found in:</p> <ul style="list-style-type: none"> • the CIRIA C697 document SuDS manual • HR Wallingford SR 666 Use of SuDS in high density developments • CIRIA C635 Designing for exceedance in urban drainage – good practice • the Interim Code of Practice for Sustainable Drainage Systems. The Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS. <p>Q14 This is covered in CIRIA C753 The Sustainable Urban Drainage Systems (SuDS) Manual, so would be duplicating.</p>		
Betts Associates	Q11 identify opportunities to improve the existing drainage situation (retrofitting SuDS – brownfield sites)		Comment noted and agreed. A section on retrofitting has been included within the draft SPD.

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	<p>Q12 Should be listed in the main body if it gives more detail regarding the bullet points listed maybe append some examples of design principles (eg case studies where one or more of these design principles have been met by a development previously in the borough).</p> <p>Q13 Not sure what else should be added – unsure of the wording ‘keep surface water on the surface’. Benefit of some SuDS features is that time is allowed for natural losses to occur.</p> <p>Q14 useful to list these, but for further info guide reader to CIRIA document (C802 – the natural flood management manual, and also the SuDS manual -V6) as this will keep the document concise.</p> <p>Q15 Yes</p> <p>Q16 Yes. It may be worth noting that it should be clear who is generally responsible for the maintenance of private vs adopted SuDS.</p>		<p>A selection of case studies are available within the appendices.</p> <p>Noted and correction made.</p> <p>References are made to the CIRIA SuDS manual throughout.</p> <p>Noted. A section on SuDS adoption covers this point.</p>
Saint Annes Town Council	<p>Q11 Yes, United Utilities produce statistics of how much households using water butts are saving per month/quarter.</p> <p>Q13 Limit development numbers</p>		<p>This can be viewed on the United Utilities website. Guidance is however, provided to encourage water harvesting in domestic dwellings.</p> <p>This is not within the scope of the SPD.</p>

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Historic England	<p>Q4 To mitigate any risks posed to buried archaeological remains. It is important to consider the impacts of SuDS and flood risk mitigation may have on heritage and archaeological assets. Changes to the water quality levels and changes to local hydrology can affect the preservation of archaeological remains and steps should be taken to mitigate any impacts from development.</p> <p>Q11. Impacts on buried archaeology and the preservation of waterlogged remains should be considered when designing SuDS.</p>		Noted and relevant information has been added to the draft SPD.
Natural England	<p>Q11: Natural England highly support the use of SuDS. However in regards to discharging to a surface waterbody we advise you may wish to consider if the waterbody is within or has a hydrological connection to an internationally or nationally designated site. If this is the case we would expect to see an assessment of impacts this discharge may have, together with any required mitigation to ensure no pollution via the discharge will adversely affect the designated site.</p> <p>Q12: Yes</p> <p>Q13: Natural England would advise that the design principles regarding supporting and protecting natural local habitats and contributing to habitat connectivity could be strengthened. We would advise these design principles should be amended to restore and enhance local habitats/species and habitat connectivity.</p>		<p>Noted. This will be dealt with as part of the planning process.</p> <p>Noted and agreed. It is considered that the addition of 'restoring and enhancing local habitats/species and habitat connectivity' as a design principle, combined with the strong focus throughout on securing a strong ecological value provides a substantial emphasis on this topic.</p>

Consultee	Key text from representation	Changes sought	Council Response
MoD	<p>It is understood that the Fylde Council is undertaking scoping consultation on their Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) Supplementary Planning Document (SPD). The MOD has areas of interest within Fylde Councils authority area, denoted by Safeguarding zones which exist to protect the operation and capability of airfields and/or technical assets which may be located inside or outside the Council's boundary. BAE Warton is located within the Fylde Councils Flooding, Water Management and SuDS SPD boundary and benefits from safeguarding zones drawn to minimise the potential for birdstrike risks being introduced.</p> <p>Additionally, the MOD have an interest in RAF Woodvale which benefits from safeguarding zones that seek to minimise the potential for birdstrike risks being introduced.</p> <p>Zones with a radius of 12.87km is designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. Within these zones development that has the potential to provide an attractant environment to certain large and/or flocking bird species hazardous to aviation safety may be subject to design requirements or for management plans to be applied. Sustainable Urban Drainage Systems (SUDS) provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated reedbeds, wetlands ponds and ditches provide a range of habitats for wildlife, potentially</p>		<p>The Council recognise that one of the potential outcomes of the implementation of Suds is the increase in bird species. It is understood that schemes within a certain radius around safeguarding zones may be refused due to the increased danger of birdstrike. Additional text has been added with respect to this. Case by case particulars will be assessed during the planning process.</p>

Consultee	Key text from representation	Changes sought	Council Response
	<p>increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.</p> <p>.....In addition, the MOD request that developers are made aware, through policy provisions, that development which might result in the creation of attractant environments for large and flocking bird species hazardous to aviation will be subject to scrutiny, and that those schemes where risk cannot be removed or mitigated will be refused.</p>		
Water Quality and Pollution Control			
Kirkham Town Council	We object to developers disposing of sewage in open spaces as well as wastewater.		Comment noted.
Saint Annes on the Sea Town Council	<p>Q.17. Yes.</p> <p>Q.18. Yes, Fines issued when targets not met.</p>		The SPD cannot introduce fines for missed targets.
Fairhaven Golf Club	Q. 17. Yes		Comment noted.
Betts Associates	<p>Q.17. Yes, this is an important justification/benefit of SuDS features.</p> <p>Q.18. No.</p>		Comments noted.
Natural England	Q.17. Yes, however, Natural England would expect that the assessment of whether the proposed development will have any negative effects on the watercourse should also include consideration of any nearby relevant designated sites.		Noted. This will be dealt with as part of the planning process.

Consultee	Key text from representation	Changes sought	Council Response
	<p>If the proposed development will have negative effects on a watercourse connected to an internationally designated site such as a Special Area of Protection, Special Area of Conservation or Ramsar then Natural England advise that a project level Habitat Regulation Assessment will be required.</p> <p>Q18. No. Natural England would expect any mitigation required for a development that will impact on a designated site by water quality to be informed by the assessment undertaken.</p>		
Environment Agency	<p>Q17: Yes. It is not clear why the guidance refers just to identifying a watercourse – ground and surface waters can be impacted and sewers can convey polluted water to waterbodies.</p> <p>It should be highlighted that developers should incorporate pollution prevention measures to protect ground and surface water. The latest Pollution Prevention Guidance targeted at specific activities, available at https://www.gov.uk/guidance/pollution-prevention-for-businesses</p> <p>The guidance should refer developers to our groundwater position statements at https://www.gov.uk/government/publications/groundwater-protection-position-statements. This publication sets out our position for a wide range of activities and developments.</p>		<p>The Council appreciates and it is recognised within the SPD that developments can result in water pollution from toxic substances entering soil, water via drains or directly into water bodies, the inappropriate disposal of site waste or the inappropriate treatment of wastewater during construction.</p> <p>Noted. The link has been added.</p> <p>Noted, the link has been added.</p>

Consultee	Key text from representation	Changes sought	Council Response
	<p>Where necessary, any subsequent planning application will need to be accompanied by an appropriate hydrogeological risk assessment to assess the impacts of the proposed development on groundwater. Mapping showing Groundwater source protection zones (SPZs) - GOV.UK (www.gov.uk).</p> <p>8.3 It is not clear what mapping is being referred to – please specify. For information, main river mapping is available here, but it doesn't show non-main rivers: Statutory Main River Map (arcgis.com). Proximity to all watercourses should be also be mentioned in relation to site layout (see comments above). This section should link to SUDS (and visa versa) as they can helps absorb diffuse pollutants, and improves water quality.</p> <p>We would also suggest links to the following in relation to water quality issues associated with agricultural development:</p> <ul style="list-style-type: none"> • Storing silage, slurry and agricultural fuel oil - GOV.UK (www.gov.uk) • Rules for farmers and land managers to prevent water pollution - GOV.UK (www.gov.uk) <p>Q18: Yes. Consideration of the construction phase of development and phasing of SuDS in order that they can help with managing construction phase runoff.</p>		<p>Comment noted and agreed. Information on how to find out about watercourse ownership has been provided for clarity. Guidance on site layout in relation to the location of watercourses has been provided.</p> <p>It has been well acknowledged within the SPD that SuDS can assist with pollution control with examples provided throughout.</p> <p>Noted. Links have been added.</p>
United Utilities	Q.17. Yes, we are supportive of this approach.		Noted and the CIRIA SuDS manual has been referred to in the document.

Consultee	Key text from representation	Changes sought	Council Response
	Q.18. In consideration of maintaining and enhancing the impact on water quality and reducing water pollution, we could direct the LPA to the CIRIA SuDS Manual in particular <i>'Chapter 4 Designing for Water Quality'</i> .		
Appendices			
Lancashire County Council	The LPA could consider including the North West SuDS Pro-Forma as an appendix.		Agreed. The SuDS pro-forma has been added as an appendix.
Environment Agency	We would suggest including diagrams (eg showing finished floor levels, flood proofing, design flood level, ground level in context), images and photographs to help the user of the document better understand the issues and how they can be addressed and achieve a net gain (eg. Reduce flood risk overall, contribute to biodiversity and environmental improvements etc). Such visual aids may be best placed in the main document, however.		An Environment Agency diagram depicting combined resistance and resilience measures has been added as Appendix C.
Historic England	Advisable to review the geology of soils in the Fylde region to understand how water drains and flows in the area.		A review of soils is outside the scope of the SPD.
Little Eccleston with Larbreck Parish Council	I am not able to offer that guidance.		Comment noted.

Consultee	Key text from representation	Changes sought	Council Response
Fairhaven Golf Club	<p>As a golf club, drainage is an essential mechanism to allowing our business to fully operate. If local drainage is sufficient enough, then this will in turn provide greater local economic benefit as golf will be playable year-round.</p> <p>Critical items, in my view, are to ensure the appropriate levels of maintenance are implemented, ensuring that any additional demands on the system can cope with it, and to ensure that the practicalities of moving water away from the area are achievable. It is my understanding that many of the local drainage issues that we experience link to the beginning of the system, something which also needs addressing if additional drainage systems are to be added.</p>		<p>Comments noted and agreed.</p> <p>It is the responsibility of the developer to ensure that a suitable maintenance management plan is provided for future maintenance for any proposed drainage ensuring that an adequate maintenance model can be implemented. This will be assessed as part of the planning process.</p> <p>The importance of considering drainage at the very start of a scheme is promoted within the guidance.</p>
Saint Annes Town Council	No		Comment noted.
Betts Associates	As previously noted, case studies of SuDS that have achieved some of the design principles outlined. Extracts from pertinent legislative documents. Mapping to identify CDA's, or areas that may be at risk of drainage issues in the near future.		<p>Case studies have been provided in the appendices.</p> <p>Information on Critical Drainage Areas has been omitted from the SFRA. This is due to the fact that over time areas that are expected to flood do not, and vice versa. Therefore, having this information in a document that can</p>

Consultee	Key text from representation	Changes sought	Council Response
			<p>be viewed for a number of years could be misleading. The same approach is viewed as appropriate with the SPD.</p> <p>Although the Council is aware of flooding issues within the Borough, Gov.uk websites where such public domain data is available should be consulted and included as part of a development FRA as this information is updated and adjusted as appropriate by the Environment Agency. All the current guidance on Gov.uk for flooding should still be adhered to.</p>
United Utilities	<p>See above guidance documents referenced under our response to Q.6.</p> <p>We request that the SPD links to wider policies in the Local Plan, including the Council's Biodiversity SPD and the St Annes on the Sea Design Guide.</p> <p>We welcome the commentary in the consultation document on Green Infrastructure and Natural Flood Management and query whether further guidance could be provided on these matters to encourage implementation on development sites.</p>		<p>Noted. The SPD links to wider policies in the Local Plan, with the full versions of the water management policies (CL1 and CL2) provided in the appendices.</p> <p>More in depth guidance on Natural Flood Management is provided within the main body of the document.</p>

