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Our ref: 22.2892

Your ref:

DRAINAGE STATEMENT & JUSTIFICATION

PROPOSED 9No DWELLINGS OFF SCHOFIELD STREET, HEYWOOD.

Site: Lancashire Dog Training Centre, Bamford Road, Heywood Proposal: Demolition of existing structures and erection of 6 no. flats in a detached building.

1. Introduction

This statement has been prepared in support of a planning application for the above site. It sets out the drainage considerations relevant to the proposed development, in particular the request that percolation testing (BRE 365) be secured via planning condition, to be undertaken once the site has been cleared and demolition completed.

The purpose of this document is to:

- Demonstrate compliance with local and national drainage policy.
- Set out site-specific constraints that make percolation testing impractical at this stage.
- Provide a strategy for ensuring that sustainable drainage measures can be properly investigated and implemented at the appropriate point in the development process.
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2. Policy Context

National Planning Policy Framework (NPPF)

- Paragraph 167 requires that development does not increase flood risk elsewhere and manages surface water appropriately.
- The drainage hierarchy must be applied: infiltration to ground, discharge to watercourse, discharge to surface water sewer, and finally combined sewer.

Non-Statutory Technical Standards for SuDS (DEFRA, 2015)

- Developers are expected to consider infiltration in the first instance.
- Where infiltration is not viable, alternatives with attenuation and flow control are acceptable.

Rochdale Local Plan Policies

- Policy G8 – Managing Water Resources and Flood Risk: requires sustainable drainage systems unless demonstrated impracticable.
- Policy DM1 – General Development Requirements: seeks safe and sustainable infrastructure solutions.

The applicant's approach aligns with these requirements, subject to site constraints explained below.

3. Site Description and Existing Use

- The site currently accommodates the Lancashire Dog Training Centre.
 - Buildings: a large main training building, two dog runs, multiple outbuildings, cages, and storage sheds.
 - Boundaries: 700 mm high brick wall with 1.2 m railings to the front.
 - Underground infrastructure: surface water manholes, existing drainage runs, incoming gas service, and electricity cables identified.
 - Current operations: the centre functions as a working dog training business, with members of the public, staff, and animals using the site daily.
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4. Percolation Testing Requirements

Rochdale MBC's Drainage Officer has advised that percolation testing is required to confirm infiltration capacity for soakaway design.

- Normally, a BRE 365 percolation test involves excavating a trial pit 1–2 m deep, filling with water, and monitoring drainage.
 - Pits must remain open for observation, requiring safe fencing and spoil management.
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5. Constraints Preventing Pre-Determination Testing

Several factors make it impractical and unsafe to undertake percolation testing while the existing business and structures remain:

1. No safe working space – all ground areas are occupied by buildings, runs, or structures.
2. Utility risks – known drainage, gas, and electricity services cross the site; excavation risks service strikes.
3. Boundary restrictions – wall and railings prevent bringing machinery on-site.
4. Health and safety – open pits present unacceptable hazards for staff, visitors, and dogs.
5. Business continuity – as a working business, it cannot safely operate alongside excavated pits and stored spoil.

These constraints make testing disproportionate at this stage.

6. Applicant's Commitment to SuDS

The applicant fully supports sustainable drainage and does not oppose percolation testing in principle. Instead, the proposal is to:

- Secure the test requirement via planning condition.
 - Undertake BRE 365 testing post-demolition and site clearance.
 - Identify the most suitable location(s) for infiltration testing once the ground is accessible.
 - Provide a full drainage strategy based on the outcome, including:
 - Soakaways if infiltration viable.
 - Attenuated discharge with flow control to sewer if infiltration is not possible.
 - Incorporation of SuDS features such as permeable surfacing, rainwater butts, and green planting to enhance attenuation and water quality.
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7. Alternative Drainage Measures (If Infiltration Proves Unviable)

If testing shows infiltration is unsuitable, the drainage hierarchy allows for alternative measures:

- Attenuated storage (geocellular crates, oversized pipes, or modular tanks).
- Flow control device (e.g. Hydrobrake) restricting discharge to greenfield rates.
- Permeable paving in parking areas with lined sub-base for storage.
- Rainwater harvesting butts for landscape irrigation.
- Blue/green roof technology (if design permits).

This ensures the scheme can still comply with Rochdale's policy aims.

8. Planning Justification for a Condition

NPPF paragraph 55 states that planning conditions are appropriate where requirements cannot reasonably be met before determination.

- Here, the technical evidence is clear: excavation is unsafe and impractical before demolition.
 - Conditioning the percolation test ensures that drainage issues are properly resolved without creating disproportionate cost or health and safety risks.
 - This approach ensures deliverability while retaining full compliance with drainage policy.
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9. Suggested Condition Wording

“No development shall commence (other than demolition) until a scheme of percolation testing, in accordance with BRE 365, has been undertaken following clearance of the site. The results shall inform a detailed surface water drainage strategy, which shall be submitted to and approved in writing by the Local Planning Authority. The approved drainage scheme shall be implemented in full prior to occupation of the development.”

This ensures the council retains full control but allows safe and practical sequencing.

10. Conclusion

- The applicant accepts the requirement for percolation testing but cannot safely deliver it on the operational site prior to demolition.
- Excavation now would present unacceptable risks to health and safety, utilities, and the ongoing business.
- A planning condition provides a balanced solution, ensuring testing is carried out properly at the correct time, while allowing the development to proceed.
- The approach is consistent with NPPF, local policy, and SuDS best practice.

We therefore respectfully request that Rochdale MBC accepts this approach and secures the testing requirement via planning condition.