

## Burnett, James

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**From:** Planning Comments (SMDC)  
**Subject:** FW: External Consultation Letter - App ref SMD/2018/0180  
**Attachments:** 20180425 DBH Response Objection.pdf

-----Original Message-----

From: Hughes, David B (E,I&S) [<mailto:davidb.hughes@staffordshire.gov.uk>]  
Sent: Wednesday, September 05, 2018 2:27 PM  
To: Planning (SMDC)  
Subject: External Consultation Letter - App ref SMD/2018/0180

Hello planning,

I'm not sure what the purpose of this modelling is. If it is intended to challenge the EA's flood zone mapping of the Kingsley Brook, then it will need to be submitted to the EA for assessment by them, (even if it is not a Main River). Has it been sent to the EA?

If it is intended to show that no part of the proposed development (as shown in the RSK drawing Engineering Appraisal Phase 2 in the FRA) is in the floodplain, then it doesn't appear to do that either.

The analysis then states that landscaping works will take the proposed Phase 2 out of the floodplain, but only by worsening flooding elsewhere. This includes the field opposite. Has this been agreed with the owner of that field please?

This analysis does not really address all the comments I put in reply to the last consultation, which I include again above. So I would have to continue to recommend refusal.

Dave

Dave Hughes  
Flood Risk Officer  
Strategic Asset and Network Management  
Staffordshire County Council

Providing a Flood Risk Management service for Staffordshire County, Sandwell, Walsall and Wolverhampton Councils.

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'As of 7th November, 2017, Staffordshire County Council will be charging for their Pre-Application Advice Service. Pre-Application Advice and Consent for ordinary watercourse works for sites in Staffordshire can be ordered through our Developer Advice online form. Please see details and links on our website'

-----Original Message-----

From: Planning (SMDC) [<mailto:planning@staffsmoorlands.gov.uk>]

Sent: 28 August 2018 14:08

To: Flood Risk Management Team

Subject: External Consultation Letter - App ref SMD/2018/0180

Please find attached document

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## Lead Local Flood Authority Planning Application response

Lead SCC Officer	Dave Hughes
Local Planning Authority	Staffordshire Moorlands District Council
Planning application name	Hybrid application comprising: full permission for 125 dwellings and access to a proposed primary school and outline permission for up to 175 dwellings on Land to the East of Froghall Road (relates to FRM/2017/140)
Planning application reference	SMD/2018/0180
Type of application	Hybrid Outline +Full
Date consulted	5/4/18
Date of response	25/4/18

### Disclaimer

This response is made by the County Council in its capacity as a Lead Local Flood Authority as a statutory consultee. As a Lead Local Flood Authority we respond to Planning Applications where resources allow and considering where development has the greatest ability to affect flood risk.

These comments should be taken as general comments on flood risk and drainage only. A detailed review of any technical methodology and results has not been undertaken by the Council. Liability for such technical work therefore rests with organisation(s) who have undertaken the said work.

### General observations/ local flooding information

Flood Zone	Mostly Flood Zone 1 with a small amount of zone 2 and 3 to the east.  The Environment Agency should also be consulted for bespoke comments where a development is in Flood Zones 2 or 3
Surface water risk	Yes, updated Flood Map for Surface Water shows minor ponding and some flow routes that would be rationalised through development
Past flooding	None Known
Watercourse within 5m of site	Yes, Kingsley Brook along eastern boundary.
Other observations	N/a



## RESPONSE

Thank you for consulting us on this planning application, our response is as follows:

### Advice to LPA

We recommend refusal on the following grounds. If you are minded to approve the application contrary to this advice, we request that you contact us again to allow further discussion.

### Staffordshire County Council Flood Risk Management position

In the absence of an acceptable Flood Risk Assessment (FRA)/Drainage Strategy we recommend refusal to the grant of planning permission for the following reasons:

### Reason

The submitted documents do not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted documents are not acceptable because:

1. Buildings are shown within Flood Zones 2 and 3 of the Kingsley Brook, including a foul pumping station.
2. A foul sewer for the western part of the site is shown discharging into manhole 1109 on Ayr Road. I believe this is a surface water drain that leads straight to the Cecilly Brook.
3. You do not appear to have addressed predicted surface water flooding problems at the west end of the site, backing onto properties on Ness Grove or for the North part of the site around the playground at the end of Donkey Lane.
4. You have not established you have an agreed point of discharge for the surface water from the west part of the site, which is the Full application element.
5. You have not explained how you will be achieving an acceptable rate of discharge of surface water from the west part of the site in comparison to the existing site.
6. You have not established where/how attenuated water will be accommodated within the site for the full application area.
7. I'm not sure how the building footprint corresponds to the included phasing plan.
8. Who will maintain the proposed surface water system over the lifetime of the development please?
9. I am not sure how the proposed sustainable drainage system is achieving any water quality improvements at all, which is a central design goal of these systems.
10. Development levels will need to be controlled where they abut to existing development in order to prevent surface water shedding into

adjacent properties. Or else there should be perimeter land drains to intercept this flow.

If the applicants or agents wish to discuss this position with us, they should contact Dave Hughes (01543) 334064

Please contact us on [flood.team@staffordshire.gov.uk](mailto:flood.team@staffordshire.gov.uk) if you have any queries about this response.

