

From: [Bushnell, Adam \(E,I&S\)](#)
To: [Planning \(SMDC\)](#)
Subject: RE: Planning Application Consultation SMD/2021/0628– EIA Screening Opinion Request for proposal at John Pointon And Sons, Bones Lane
Date: 18 November 2021 11:15:06
Attachments: [image003.png](#)

Good Afternoon,

FAO: Case Officer – Jane Curley

RE: Planning Application Consultation SMD/2021/0628– EIA Screening Opinion Request for proposal at John Pointon And Sons, Bones Lane

Thank you for your email and consultation with regard the above referenced development.

Please see below for an assessment inline with the Staffordshire County Council- acting as Lead Local Flood Authority - guidance, including general flood risk advice.

As this proposed development is greater than 1 hectare in site area, this constitutes Major Development- so a Flood Risk Assessment (FRA), is required to accompany this. For more detail as to what this should include, refer to the advice in our [SuDS Handbook](#) and [website](#). A Sustainable Drainage Scheme / Strategy is required for all Major Development proposals to ensure that sustainable drainage systems for the management of runoff are implemented, unless it can be demonstrated that a scheme/strategy is not necessary or that a more appropriate solution can be proposed. Please be guided by the [website](#).

According to our best records and information, the site itself is not currently impacted by the 1 in 30 and 1 in 100 Surface Water Flood Zones (from the Environment Agency's updated Flood Map for Surface Water).

An FRA and Drainage Strategy will be required to show how the flood risk from all sources will be managed on site. Also, evidence will need to be provided to show that no increase in flood risk offsite is caused or aggravated by the development.

For more specialist advice, you are advised to contact the Staffordshire County Flood Risk Management Team, as a Technical Statutory Consultee on all Major Developments, via the Local Planning Authority (WMBC).

In general any surface water drainage scheme should demonstrate, but not necessarily be limited to, the following:

- Surface water drainage system(s) designed in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (SuDS) – (DEFRA, March 2015).
- Limiting the discharge rate generated by all rainfall events up to the 100 year plus (40%) Climate Change.
- Provision of adequate surface water runoff attenuation storage
- Detailed designs (plans, network details and calculations) in support of any surface water drainage scheme, including details on any attenuation system, and the outfall arrangements. Calculations should demonstrate the performance of the designed system for a range of return period and storm durations.
- Plans illustrating flooded areas and flow paths in the event of exceedance of the drainage system.
- Provision of an acceptable management and maintenance plan for surface water drainage to ensure that surface water drainage systems are maintained and managed for the lifetime of the development.

- Provision of supporting information to demonstrate that sufficient water quality measures have been incorporated in the design. This should be in accordance with the CIRIA SuDS Manual Simple Index Approach and SuDS treatment design criteria
- Evidence of compliance with the principles of the drainage hierarchy, as described in Part H of the Building Regulations. If applicable, evidence of infiltration testing in accordance with BRE365 should be provided. If discharge is proposed to a surface water sewer, then evidence should be provided regarding permission to connect.
- A Construction Environment Management Plan to show that safe construction practices will be implemented and that the flood risk both to the site and elsewhere is identified, managed and mitigated appropriately during the construction phase.

Having received a query directly from the applicant recently, we (the LLFA), would like to work with all relevant parties to ensure that the quality of surface water runoff discharging from the site is maintained. I.e. surface water pollution is adequately mitigated against. Please can we recommend that the Environment Agency are consulted on this matter (given the specific organic nature of the potential pollution associated with this development), if you have not already consulted them.

Should you have any further questions, then feel free to ask. I hope this helps.

Many thanks,



Kind regards,

Adam Bushnell | Flood Risk Planning and Projects Officer

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