

Lead Local Flood Authority Planning Application response

Lead SCC Officer	Adam Bushnell
Local Planning Authority	Staffordshire Moorlands District Council
Planning application name	Development of 75 new dwellings, new access and provision of green infrastructure and associated works at Ash Bank Road, Werrington
Planning application reference	SMD/2021/0694
Type of application	FULL
Date consulted	04/11/2021
Date of response	26/11/2021

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	Flood Zone 1 The Environment Agency should also be consulted for bespoke comments where a development is in Flood Zones 2 or 3
Surface water risk	No
Past flooding	None Known Our information about past flooding is based on data that the Flood Risk Management team holds. Where other authorities (such as LPAs) have been made aware of issues, we cannot guarantee they have passed this information on to us.
Watercourse within 5m of site	N/a
Other observations	N/a



RESPONSE

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

Advice to LPA:

We recommend that planning permission is **not granted** 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 and Drainage Strategy, we recommend that planning permission is not granted on this basis for the following reasons:

Infiltration Testing Results

As a large proportion of the proposed developments drainage is dependent on soakaway systems, the LLFA requests submission of full and complete infiltration testing reports, in accordance with BRE 365 guidance. In order to assess and review the suitability of the proposed development and associated drainage, the testing report is necessary as evidence to accompany the application.

Full hydraulic assessment of complete range of return periods.

To accompany any Full Major Planning Application, hydraulic modelling assessments comprising a complete range of return period scenarios are required. As a minimum all of the 1 in 1, 1 in 2, 1 in 30, 1 in 100, 1 in 100 plus (40%) Climate Change return period scenarios should be modelled (e.g. in MicroDrainage software), in order to demonstrate the compliance of the proposed drainage system.

Please can the LLFA Request that a full range of calculations and model results are provided.

Impermeable Area Plans

Please can the LLFA request a clear demonstration of all impermeable areas as well as permeable areas in plan or diagram form, this will enable a full detailed review and assessment of the proposed development.

Exceedance Flow Routes

The LLFA requires evidence that in the event of exceedance of the proposed development's drainage system, flows will be accommodated and directed in an appropriate manner, particularly, away from vulnerable receptors.

Please therefore, can the LLFA request that an exceedance flow plan is provided by the applicant to demonstrate satisfactory exceedance flow routes.



Plot Drainage

In order to alleviate any confusion in regard to which plots are to be drained to which part of the network system, please can it be clarified exactly how each plot drains and to where.

Agreement and evidence of third party consent to discharge into existing system.

A significant proportion of the development is proposed to discharge to the Severn Trent Water (Plc), network. Please can evidence of a formal Section 106 agreement be provided.

Water Quality Management and Pollution Mitigation

Please can the LLFA request detail from the applicant as to how water quality management and pollution mitigation will be incorporate into the site SuDS design. For example, demonstration of how the CIRA Simple Index Approach to surface water quality management has been implemented in sites SuDS design would be beneficial.

Management and Maintenance Plan

For any Full Major planning application, a detailed Management and Maintenance Plan and / or schedule is required to demonstrate that there will be an adequate and satisfactory maintenance in place for the full duration of the proposed development's lifespan. Also, reference to a specific party or body responsible for the upkeep of the proposed development for the entire duration of the proposed development's lifespan, as well as the associated funding mechanism, is required.

Development Management and Construction Phasing Plan

Please can the LLFA request receipt of a full and complete, detailed Construction Environment Management Plan to demonstrate that the applicant has considered and appropriately put measures in place to mitigate against flood risk and surface water runoff management during all of the construction phases of the project.

Reason:

The proposed development may present risks of flooding on-site and/or off-site if surface water run-off or other external flood risk is not effectively managed.

The above points are not necessarily exhaustive. Please can we request re-consultation with amended details and information once the above items have been considered and addressed. Should you have any queries regarding this, please contact flood.team@staffordshire.gov.uk

Please contact us on flood.team@staffordshire.gov.uk if you have any queries about this response.

the knot unites

