

Lead Local Flood Authority Planning Application response

Lead SCC Officer	Adam Bushnell
Local Planning Authority	Staffordshire Moorlands District Council
Planning application name	Former Railway Line – Barnfield Road; reinstatement of railway track, new platform and replacement footpath on former railway line between Cornhill, Leek and boundary of existing operational railway land at Leekbrook.
Planning application reference	SMD/2021/0700
Type of application	FULL
Date consulted	23/11/2021
Date of response	15/12/2021

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	The LLFA notes that there are instances of historic flooding in the wider area. The applicant has provided information in the form of a newspaper report of flooding to the wider area (golf course and industrial estate), during 2017, which should be noted. 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	Yes River Churnet (Main River), therefore we recommend that the Environment Agency are also consulted on this application. There are also two ordinary watercourses (OWC) - which have been identified and acknowledged by the applicant: Birchall Playing Fields Stream – OWC in the north of the site Leek Golf Club Land Drain – in the south of the site. According to best LLFA information and data- there appears to be at least one other watercourse crossing the site boundary, in the central region.
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 recommend 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 planning application is not granted on this basis for the following basis:

Reason:

Hydraulic Modelling

In order to demonstrate that flood risk both to the site, and elsewhere has been adequately assessed, particularly with regard the three ordinary watercourses that our data indicates cross the site, please can the LLFA request that the applicant provides details of an appropriate level of hydraulic modelling. This should demonstrate that the proposed development will not exacerbate any existing flooding risk to the land upstream and downstream of the railway embankment. Also, it should provide evidence that the embankment itself is appropriately protected from flooding. This evidence could be provided in the form of a hydraulic modelling report as part of an FRA addendum or appendix.

Platform Detail

It is currently unclear as to the exact dimensions of the proposed station platform and its drainage design implications. Please can the LLFA request a design drawing of the platform and associated annotated dimensions to indicate impermeable areas and to where they will drain.

Car Park Area- Drainage

The 'General arrangement plan sheet 1 Rev H' design drawing refers to 200 car parking spaces. Currently it seems unclear as to whether these form part of the proposed development. If they do, the LLFA would expect to have evidence of a full and detailed drainage design- with a fully annotated plan indicating appropriate Sustainable Drainage Infrastructure (SuDS), and associated impermeable areas. All proposed development drainage should be in accordance with the Non-Statutory Technical Standards for SuDS in any case.

Flood Risk Assessment

The Flood Risk Report submitted for review (produced by Michael Lambert Associates), is dated 2017. Please may the LLFA ask for clarification as to why this is not up to date to align with the date of the current application submission? A more up-to-date full and detailed Flood Risk Assessment and accompanying detailed drainage design in accordance with the details specified in the Staffordshire County Council SuDS Handbook is requested.

Annotations and Labels on plans

For ease of reading, please can we request that all plans are labelled with figures in the same alignment. On some of the development layout drawings the labels are opposite in terms of orientation, which hinders our review.

Surface Water Quality

Please can the LLFA request relevant detail indicating that management of surface water quality and pollution mitigation has been considered? Implementation of the CIRA SuDs Manual Simple Index Approach to Surface Water Management for example, could be utilised to indicate adequate consideration.

Construction Environment Management Plan

The LLFA requires evidence that, during the construction of the proposed development, appropriate measures are to be implemented to ensure that adequate provision for flood risk, both to the development site, and elsewhere is put in place. Surface water runoff quality should also be appropriately managed. A Construction Environment Management Plan, or similar document should be included with the application submission.

Management and Maintenance

For all Full Major development, the LLFA requires that a full and complete schedule of management and maintenance activities for the full and entire lifespan of the development is submitted. This should specify the relevant party/(ies) or body(ies) responsible for this upkeep and an adequate funding mechanism for such activities.

The points noted above are not necessarily exhaustive. Please can the LLFA request re-consultation once the above points have been addressed.

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

