

Lead Local Flood Authority Planning Application Response

Lead SCC Officer	Henry Wood
Local Planning Authority	Staffordshire Moorlands District Council Sandwell Borough Council (SMDC)
Planning application name	Full Planning Application for residential development of 67 houses with a mix of two and two and a half storey dwellings, consisting of new access to Cheadle Road, new public open space, sustainable urban drainage, landscaping, pumping Station and associated works. Land Off, Cheadle Road, Upper Tean, Staffordshire.
Planning application reference	SMD/2022/0249
Type of application	Full
Date consulted	22/06/2022
Date of response	12/07/2022

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	The site is within Flood Zones 1, 2 and 3 of the River Tean.
Surface water risk	Yes, the updated Flood Map for Surface Water (uFMfSW) does affect the proposed site area. This is mainly 1000-year coverage which affects the western section of the site and has a footprint equal to that of the fluvial flooding extent.
Past flooding within 20m of site	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	Yes. The River Tean flows adjacent to the sites western site boundary. In addition, there is an existing ditch located within the central portion of the site which provides land drainage to the development site before discharging into the River Tean. Should the development works affect the ordinary watercourse within the site, the applicant will be required to procure ordinary watercourse consent prior to works being undertaken.
Other observations	None.



RESPONSE

Thank you for consulting us on this full planning application. Our response is detailed below.

Staffordshire County Council Flood Risk Management position

We have reviewed the submitted information and insufficient detail has been provided to demonstrate that an acceptable drainage strategy is proposed.

The absence of an adequate drainage strategy/ management and maintenance plan is sufficient reason for refusal of planning permission.

We would therefore recommend that planning permission is not granted until an adequate analysis has been submitted.

Reason

We have reviewed the Flood Risk Assessment (27th May 2022) and the Sustainable Drainage Statement undertaken by Travis Baker (no date).

The Sustainable Drainage Statement references documents which are not submitted with the application and would appear to reference other development sites. In addition, the management and maintenance plan is not adequate.

Upon review, we have noted the following: -

- Section 2.0 (SuDS at Cheadle Road) states:

*The SuDS basin (on the Western part of the site) is taking flows from the 45 out of the **60 dwellings** of the proposed development while the other 15 dwellings discharge a controlled flow to the watercourse via a piped system that also allows for a private Aquacell tank.*

The application form states that the development is for 67 houses.

- Section 3.0 (Discharge Rates) states:

In accordance with drawing "AAC5806-RPS-xx-xx-DR-C-600_Drainage & Levels Concept_P01" produced by RPS, we will be using a discharge rate of 11.7l/s.

The outfall locations of this discharge will be on the Western side of the site and towards the existing watercourse.

Drawing AAC5806-RPS-xx-xx-DR-C-600_Drainage & Levels Concept_P01 is not appended to the sustainable drainage statement and has not been submitted via the planning portal.

- Section 4.0 (Managing the SuDS) references *Charlton School, Telford* which would appear to reference another development site.



- Section 5.0 of the sustainable drainage statement does not provide a named body responsible for undertaking management and maintenance of the SuDS features over the lifetime of the development.
- Appendix I (Drainage Design) refers to two drawings undertaken by Travis Baker which are not appended to the document and have not been submitted via the planning portal.

We ask to be reconsulted with the results of a drainage strategy and an updated version of the Sustainable Drainage Statement.

Our objection will be maintained until an adequate analysis has been submitted.

Advice to applicant

Our criteria for an acceptable drainage strategy are laid out in full in the SCC SUDS Handbook, which can be downloaded from our website (<https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-planners-and-developers.aspx>).

In general, we would ask the applicant to update the sustainable drainage statement and append relevant drawings as referenced.

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-technical standards for sustainable drainage systems (DEFRA, March 2015).
- Limiting the discharge rate generated by all rainfall events up to the 100 year plus climate change in accordance with the guidance in the SCC SUDS Handbook.
- Provision of surface water runoff attenuation storage.
- Detailed design (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 periods 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 shall be maintained and managed for the lifetime of the development.

The applicant should provide a named body responsible for undertaking management and maintenance of the drainage system over the lifetime of the development.

- Provision of supporting information to demonstrate that sufficient water quality measures have been incorporated into 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.

Please re-consult us at flood.team@staffordshire.gov.uk when amended details are received.

Please note that the issues highlighted above are not necessarily exhaustive.

If you are minded to approve the application contrary to this advice, we request that you contact us again to allow further discussion.

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

