

Lead Local Flood Authority Planning Application Response

Lead SCC Officer	Henry Wood
Local Planning Authority	Staffordshire Moorlands District Council (SMDC)
Planning application name	Change of use to a holiday park (caravan site) including ancillary social centre and facilities, car parking and landscaping. Former Anzio Camp Buxton Road Blackshaw Moor Leek
Planning application reference	SMD/2023/0137
Type of application	Change of Use
Date consulted	17/05/2023
Date of response	07/06/2023

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 FZ1
Surface water risk	Yes, the updated Flood Map for Surface Water (uFMfSW) does affect the proposed site area. This is mainly 100-year coverage around existing buildings to remain in the centre of the site. In addition, surface water ponds within the south-eastern corner of the development during the 100-year rainfall event and a flow path develops through the south-eastern corner of the site during the 1000-year event. The site is therefore at some risk of surface water flooding during high intensity rainfall events and appropriate mitigation measures (i.e., raising finished floor levels) should be considered in the final detailed design.
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. There is an Ordinary Watercourse located on the northern and southern site boundaries.
Other observations	None



RESPONSE

Thank you for consulting us on this change of use application. Our response is detailed below.

Staffordshire County Council Flood Risk Management position

At this stage, insufficient information has been submitted to demonstrate that an acceptable drainage strategy is proposed. We would therefore recommend that the change of use application is not granted.

Reason

The proposed development may present risks of flooding on-site and/or off-site if surface water runoff is not effectively managed.

The absence of an adequate drainage strategy is therefore sufficient reason for a refusal of planning permission.

Advice to applicant

We ask to be reconsulted with the results of an outline drainage strategy.

Our objection will be maintained until an outline analysis has been submitted to enable the approval of the application subject to the provision of a final detailed drainage design via a pre-commencement condition.

At this stage, the applicant shall provide a drainage statement which outlines the following:-

- Confirmation of the greenfield runoff rate for the Site.
- A confirmed point of outfall in line with the drainage hierarchy.

BRE365 Infiltration Testing shall be undertaken to demonstrate whether full or partial discharges of surface water to ground are viable via infiltration.

If infiltration is not suitable for the full disposal of surface water, then a discharge should be sought to one or other of the adjacent ordinary watercourses to the Site.

- If discharges are to be made to any watercourse(s), provide confirmation of the discharge rate which should be restricted back to greenfield run off rates.
- Provision of a quick storage estimate to calculate the required volume of attenuation storage to achieve the restricted outfall.
- Provision of an outline drainage drawing showing the location of any attenuation storage and the location of SuDS features to provide benefit in terms of water quantity, water quality, biodiversity, and

amenity.

- Surface water maps identify that the building to remain is affected by the ponding of surface water at the 100-year event. In addition, a flow path develops in the south-eastern corner of the development Site during the 1000-year rainfall event.

Please indicate what mitigation measures will be undertaken to minimise the risk of surface water flooding to the remaining building and to the lodges to be constructed in the south-eastern corner of the Site.

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.

