

Lead Local Flood Authority - (LLFA)

Planning Application - Consultation Response

Flood Risk Management Team
Staffordshire County Council

Lead Local Flood Authority - (LLFA)

Planning Application Response

Local Planning Authority	Staffordshire Moorlands District Council (SMDC)
Planning application name	Discharge of Conditions 6, 7, 8, 9, 10, 11, 12, 14, 15 & 17 in relation to application SMD/2023/0368 Land at Uttoxeter Road Blythe Bridge
Planning application reference	DOC/2024/0087
Type of application	Discharge of Conditions
Date consulted	02/12/2024
Date of response	19/12/2024

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.



Thank you for consulting us on this discharge of conditions application.

The applicant is seeking discharge of Conditions 6, 7, 8, 9, 10, 11, 12, 14 (Surface Water Drainage), 15 (Control of Surface Water), & 17.

Condition 14

Prior to the commencement of any phase of the development the final detailed surface water drainage design shall have been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

The final detailed design shall use the design principles outlined in Revision 4 of the Blythe Bridge Drainage Strategy (document reference 23945-HYD-XX-XX-RP-C-0500, 14th Feb 2024) and must further demonstrate:

- Evidence of infiltration testing undertaken in accordance with BRE digest 365 in the proposed location of the permeable paving and attenuation tank.
- A post demolition CCTV Survey to confirm invert levels and demonstrate the condition of any remaining surface water infrastructure (i.e., pipes and manholes) serving 3rd party land and demonstrate that the existing surface water outfall to the River Blithe remains in a useable condition.
- A plan showing the total impermeable area of the post-developed site.
- Limiting the discharge rate generated by all rainfall events up to 100-year event plus an allowance of 40% for climate change to 5 l/s.
- Introduction of a 2nd stage of water treatment for surface water runoff (petrol/ oil separator etc).
- Detailed design (plans, network details and full hydraulic calculations) in support of any surface water drainage scheme, including details on any attenuation system, SuDS features and the outfall arrangements.
- Calculations shall demonstrate the performance of the designed system and attenuation storage for a range of return periods and storm durations, to include as a minimum the 1:1 year, 1:30 year and the 1:100-year plus 40% climate change return periods.
- Plans illustrating flooded areas and flow paths in the event of exceedance of the drainage system (i.e., in the event of blockage).
- Finished floor levels to be set 150mm higher than surrounding ground levels to mitigate the risk from exceedance flows.

- 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.

To include the name and contact details of the body(-ies) responsible.

Condition 15

Prior to commencement of any phase of the development, details to demonstrate that satisfactory arrangements for the control of surface water are in place as part of any temporary works associated with the permanent development (to ensure that flood risk is not increased prior to the completion of the approved drainage strategy) shall be submitted to and approved in writing by the Local Planning Authority.

Our response on the discharge of these 2 conditions is detailed below.

Staffordshire County Council Flood Risk Management position

Insufficient information has been submitted to demonstrate that an acceptable drainage strategy is proposed. We would therefore recommend that the Conditions are not discharged at this time.

The outstanding issues are as below:

Condition 14:

- Post Demolition CCTV Survey

The condition requests that a post demolition survey is undertaken to confirm invert levels and demonstrate the condition of any remaining surface water infrastructure (i.e., pipes and manholes) serving 3rd party land and demonstrate that the existing surface water outfall to the River Blithe remains in a useable condition.

As this requirement is to ensure that the remaining system is in good order, the LLFA are willing to partially discharge Condition 14 when an appropriate drainage strategy has been supplied to allow for demolition/ construction works to be undertaken - a CCTV survey may then be undertaken to fully discharge the condition.

- BRE-365 Infiltration Testing

Please provide evidence of BRE-365 Infiltration Testing (or subsequent ground investigation works which advises of unsuitable ground/ contamination etc.) to confirm whether a discharge of surface water to ground, via infiltration, is feasible.

- Water Treatment

The condition requests that a 2nd form of water treatment is provided within the design.

Please provide evidence (i.e., Ciria Simple Index Tool) that the existing arrangement provides the required level of water treatment.

If the existing arrangement does not provide the required level of water treatment, please update the design to provide additional treatment of runoff prior to discharging off site (i.e., additional SuDS features and/or proprietary treatment system etc.,).

- Modelling Results

Please update the modelling results to demonstrate the performance of the drainage system for the 2-year, 30-year and 100-year + 40% events. Please provide results by critical storm duration only.

- Management and Maintenance Plan

Please submit a 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.

To include the name and contact details of the body(-ies) responsible.

Condition 15:

- Surface Water Management Plan (SWMP)

Please provide details to demonstrate that satisfactory arrangements for the control of surface water are in place as part of any temporary works associated with the permanent development.

The LLFA have provided a template document to be compiled by the Contractor undertaking the works.

Please re-consult us 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 if you have any queries about this response.

