

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	Proposed single storey extension and change of use to proposed granny bedroom with ensuite, lounge / kitchen at existing double garage outbuilding & structural alteration works to side of detached house (cottage). St Davids Cottage, Uttoxeter Road, Fole, Uttoxeter
Planning application reference	SMD/2024/0550
Type of application	Full
Date consulted	14/01/2025
Date of response	04/02/2025

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, however, the ordinary watercourse is unlikely to have been modelled; therefore, additional modelling and/ or calculations are likely to be required to demonstrate that the Site is safe from fluvial flooding.
Surface water risk	High Risk - updated Flood Map for Surface Water shows significant ponding within the Site during the 30-year return period. The access to the Site is affected by Surface Water flooding at the 100-year event and a Flood Risk Assessment would be required to demonstrate that access and egress is always available to vehicles. Appropriate mitigation measures would also need to demonstrate that the development is not at risk of inundation by surface water.
Past flooding	Yes, The LLFA have 2 recorded instances of internal and external flooding within 25m of the Site boundary. 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 Broadgatehall Brook flows adjacent to the development Site and heads south, under the highway, via a culvert.
Other observations	The Site, if developed, will become more vulnerable as additional occupants and ground floor sleeping arrangements are proposed.

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

Preamble

The LLFA have reviewed the application form and layouts submitted for the development which consist of the change of use of an existing garage into a granny annexe.

The proposals are considered as being non-statutory (i.e., minor development) and as such, the LLFA would not normally provide a bespoke response upon the application.

However, in this case, we offer the following comments in good faith to allow the LPA to make an appropriate planning decision:

In terms of vulnerability, the Site will increase in end user vulnerability from 'less vulnerable (garage) to 'more vulnerable' (granny annexe);

- The Site is in Flood Zone 1; however, this may be because the flood extent of the ordinary watercourse (Broadgatehall Brook) running along the site boundary has not been modelled;
- The Site is at high risk of surface water flooding with most of the Site being affected by surface water flooding from the 1 in 30-year return period event onwards;

Surface water flooding at higher return periods covers the entire site and affects access and egress to the property;

- We have 2 no. records of internal and external flooding within 25m of the Site;
- Whilst the Site is defended by a retaining wall, the Site is located directly upstream of a culvert which passes beneath the highway. Access to this culvert is restricted and if blocked by silt/ debris/ vegetation then flows are likely to back up and impact upon the Site until cleared; and
- The existing garage is likely to have a Finished Floor Level that is level with the surrounding ground to provide access and egress.

As such (and unless mitigated against by raising of the FFL of the proposed annexe), the annexe would be at risk of surface water inundation.

Staffordshire County Council Flood Risk Management Position

The Site is at high risk of surface water flooding and proposes to develop an existing garage into a Granny Annexe which increases the risk vulnerability of the Site.

At this stage, the LLFA would advise that a Flood Risk Assessment would need to be produced for the Site to demonstrate:

- Confirmation that the Site is not at risk of fluvial flooding.

Modelling of the watercourse (or appropriate calculations) would need to be undertaken to demonstrate the level of flood waters during the 30-year and 100-year flood events, whilst modelling the impact of the culvert becoming blocked during these events;

- Confirmation that the Site is not at risk of surface water flooding, including an analysis of any depths of surface water affecting the Site;
- Confirmation that vehicular access and egress is always available to the property;
- That measures are in place to prevent surface water from entering the property (i.e., raising of Finished Floor Levels above surrounding ground, profiling of surrounding ground to slope away from entrances and exits in conjunction with appropriate perimeter drainage; and
- That an emergency flood evacuation plan is in place.

Disclaimer: At this stage, the LLFA's information about the Site is that it is high risk; the production of a Flood Risk Assessment is to inform the LLFA and LPA of the risks to the Site and whether these risks can be appropriately mitigated against.

It should be noted that the undertaking of a Flood Risk Assessment does not guarantee a positive planning decision.

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.