

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 and 44 and 45 in relation to SMD/2021/0456. Land to the East of Froghall Road & North of Ayr Road & Cheltenham Avenue.
Planning application reference	DOC/2025/0077 Reserved Matters Application (SMD/2021/0780)
Type of application	Discharge of Conditions
Date consulted	09/12/2025
Date of response	06/01/2026

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 application.

In conjunction with Planning application SMD/2021/0780 (Reserved Matters Application relating to access, layout, scale, appearance and landscaping), the applicant is seeking discharge of Conditions 44 and 45 pursuant to SMD/2021/0456.

- Condition 44 relates to the foul drainage of Phases 2a and 2b (the LLFA would not comment).
- Condition 45 relates to drainage of surface water from phases 2a and 2b.

Condition 45: No phase of development hereby permitted in respect of Phases 2a and / or 2b shall commence, with the exception of site remediation works, until a scheme for detailed surface water drainage works (based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development) for the relevant phase has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include:-

- The results of ground investigation and percolation tests to determine the viability of Soakaways;
- Surface water drainage system(s) designed in accordance with the Non-statutory technical standards for sustainable drainage systems (DEFRA, March 2015);
- Limiting the discharge rate generated by all rainfall events up to the 100 year plus 40% (for climate change) critical rainstorm to existing greenfield rates;
- Detailed design (plans, network details and calculations) in support of any surface water drainage scheme. Calculations should demonstrate the performance of the designed system for a range of return periods and storm durations inclusive of the 1 in 1 year, 1 in 2 year, 1 in 30 year, 1 in 100 year and 1 in 100 year plus climate change return periods;
- Plans illustrating flooded areas and flow paths in the event of exceedance of the drainage system, and,
- Provision of 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.

Our response is detailed below.

Preamble

Following a meeting with the applicant, the LPA and the LLFA, and following previous submissions of the application, additional information has been provided which is outlined in covering letter 882655-LLFA(03) dated 8th December 2025.

In our previous response, the LLFA requested a technical note be provided including all the latest information and drawings for the submission and this has not been undertaken. This is required such that the information can be included in the decision notice for the discharge of the condition.

Previous Information

Infiltration Testing (See Letter Ref: 8512PHNW250207L) demonstrates that ground conditions are unsuitable for construction of traditional soakaways for surface water drainage.

An Impermeable Area Plan (882655-LDE-DR-D-40-04 Revision P6) has been provided to demonstrate that the total impermeable area of the site is 2.213ha. This includes an allowance of 10% for urban creep and the contributing areas in the drainage model match those shown upon the drawing.

The layout of the adoptable drainage system has been updated and is shown upon Drainage Strategy Drawing 882655-LDE-DR-D Revision P10. This drawing shows a gravity drainage system conveying surface water to the south of the site where a Hydrobrake limits outfalls to 17.4 l/s. An offline attenuation basin is included to provide storage for all events up to and including the 100-year + 40% event. Permeable paving is specified upon all private driveways.

The private drainage system serving the properties are shown upon Private Drainage Sheet 1 of 2 (882655-LDE-DR-D-40-21 Revision P4) and Private Drainage Sheet 2 of 2 (882655-LDE-DR-D-40-21 Revision P4).

Additional Information

Updated performance calculations have been provided to demonstrate the use of FEH-22 Rainfall Data as previously requested. Calculations show that there is no flooding for the 30-year and 100-year events, including an allowance of 40% for climate change.

In earlier versions of the submission, a swale was to be installed along the north, north-eastern site boundary to capture surface water entering the site and convey overland flows south and into the southernmost watercourse. This swale has been removed and replaced with a land drainage system which is shown upon drawing 882655-LDE-DR-D-40-30 Revision P1.

Information to be Addressed

The provision of water butts has been shown upon drawing (366-ENG-SK02); however, it remains that water butts are not included upon all properties where feasible. The applicant has stated in their covering letter that 'not all properties are able to have water butt due downspout locations i.e. terrace plots or downspouts on front elevations', however, the LLFA would request that the plan is reviewed and updated as there are properties which can include a water butt that are not currently shown.

The management and maintenance plan has been updated, however, the plan appended to the document does not show the latest drainage layout and does not include the private drainage layouts for the site. The plan can be updated and included within the technical note and reference any suitable drawings as appropriate.

It should be noted that the document states that persimmon shall undertake management and maintenance of the sites' drainage system until a management contractor is appointed following construction of the site. The details of the management company are currently stated as being 'to be confirmed'. The LLFA would consider that this arrangement is temporary; therefore, the LLFA advises the LPA that they shall consider whether a partial discharge of the condition is reasonable on the basis that the condition is fully discharged when details of the named management and maintenance company have been provided following construction of the site. This will ensure that a named contractor has been appointed to undertake the long-term management and maintenance of the site's drainage system over the lifetime of the development.

Please update the private drainage drawings to include all relevant level information for the ground surrounding properties, including driveways (add on an arrow to show flow paths) kerbs and the adjacent highway to demonstrate topographic falls and the conveyance of surface water during heavy rainfall. The drawings shall be checked to confirm that any infrastructure such as gullies/ ACO Drains etc., are correctly positioned and where driveways are sloping towards thresholds, the LLFA will require infrastructure to be included to prevent any inundation of surface water.

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 Condition is not discharged at this time.

The LLFA require that the applicant compiles a technical note to include all information, drawings and supporting information to address the outstanding issues outlined in the above response. This will allow the Condition to be

discharged by a single document to be referenced in any decision notice issued by the LPA.

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.

