

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	Erection of 9no. bungalows: 4no. for the over 55s and 5no. Standard market. Playing Fields, Holt Lane, Kingsley, Staffordshire , ST10 2BA
Planning application reference	SMD/2025/0305
Type of application	Full
Date consulted	20/11/2025
Date of response	25/11/2025

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
Surface water risk	No
Past flooding	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	No
Other observations	N/A

Thank you for consulting us on this full planning application.

Preamble

The Site is a plot of greenfield land in Flood Zone 1.

The LLFA's mapping shows that the Site is not at risk of surface water flooding; however, it should be noted that there are objections posted upon the planning portal which advise that the site under proposal may be affected by surface water flooding.

The risk of flooding to the development is low, however, the development will increase the impermeable area of the Site and therefore surface water generated by the development will need to be managed. The LLFA notes that a small pond has been included at the northern site boundary, however, it would not be suitable for providing attenuation storage as it is located at the high point of the site and would likely require pumping of surface water.

A Drainage Strategy Report has now been provided (00154_DOC_KIN-01_B), however, it is incomplete as it is not appended by the Drainage Strategy Drawing (Appendix I) or the Foul water calculations (Appendix J).

In addition, there are no watercourses in the vicinity of the Site and there are no public surface water sewers shown in Holt Lane.

Therefore, a point of discharge is not readily available unless ground conditions allow for infiltration of surface water to ground; however, no infiltration testing has been undertaken.

A discharge is proposed to the combined sewer system located within Holt Lane at 5 l/s. This is almost 4 times the Q/Bar greenfield runoff rate for the site and is prohibited by Severn Trent Water as outlined in their statutory response upon the application which clearly states:

- *No surface water to enter the foul or combined water systems by any means.*

At this stage, therefore, the Site has no confirmed point of outfall for surface waters generated by the development.

The LLFA have not reviewed the Drainage strategy Report in any further detail at this stage, so our comments are limited to the point of outfall at this stage.

Staffordshire County Council Flood Risk Management Position

We would recommend that planning permission is not granted.

Reason

The proposals consist of the development of 9 dwellings upon a site area of more than 0.5ha. Therefore, the development would be classified as 'major', and the submission of a drainage design is required.

The submitted drainage scheme should demonstrate the following:

- Surface water drainage system(s) designed in accordance with the National Standards for Sustainable Drainage Systems.
- Evidence of compliance with the principles of the drainage hierarchy, as described in Part H of the Building Regulations.

Evidence of infiltration testing in accordance with BRE365 shall be provided.

If infiltration cannot achieve a full discharge of surface water to ground and a connection to an ordinary watercourse/ sewerage asset is sought, then the discharge rate shall be restricted back to the Q/Bar Greenfield Runoff Rate for all rainfall events up to the 100-year return period plus an allowance for climate change.

Any discharge to a combined sewer network would be subject to confirmation by the sewerage authority and it should be noted that STW have advised this is not allowed in their statutory response upon the application.

- Provision of surface water runoff attenuation storage to achieve restricted rate of discharge.
- 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.

Looking at the proposed site layout, the design should be based upon the use of features to recycle roof runoff (water butts on downpipes and rain gardens); provide source control and an initial stage of water treatment (permeable paving, bio retention areas, and/ or tree catchment pits etc.,) and attenuation storage.

All shared drainage infrastructure/ features shall be in public areas to allow for access and egress for management purposes.

The LLFA will not accept any designs utilising oversized pipes as these provide no amenity, biodiversity or water quality benefits.

- 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 (2-year, 30-year, and 100-year) and storm durations (15 minutes to 7 days).

FEH Rainfall Data shall be used, and an appropriate factor of climate change shall be included upon the 30-year and 100-year return period events.

- An impermeable area plan shall be submitted to demonstrate the contributing areas of the Site which shall also be increased by a factor of 10% to demonstrate the impact of urban creep over the lifetime of the development.
- Plans illustrating flooded areas and flow paths in the event of exceedance of the drainage system.

All finished floor levels to be set 150mm above the surrounding ground, with all surrounding ground sloping away from entrances or exits to prevent the inundation of surface water.

- Provision of an acceptable outline 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.

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

