

[REDACTED]

From: Archer, Chris (E,I&S) [REDACTED]
Sent: 24 February 2026 18:01
To: Planning (SMDC); Chris Johnston
Subject: RE: Rev Plans Gen External Consultation - App ref SMD/2025/0243

[REDACTED]

Chris,

Thank you for your further consultation received on 03/02/2026.

Having reviewed the latest Flood Risk Assessment & Drainage Strategy (Revision 09, 30/01/2026) I have added further comments in red where there are outstanding concerns.

We would recommend that planning permission is not granted unless and until these points have been resolved.

Consultation with Severn Trent:

- Supply results of site survey identifying existing connections to STW network. STW to confirm acceptance of retention of existing connection for catchment drainage, update sewer records and hydraulic model.

Site investigations have identified existing land drainage connections to the STW network at manhole 5201 and manhole 3002, which are not included in the sewer records. It is proposed to retain and formalise these connections by diverting an existing pipe across the site and constructing a new headwall and catch pit.

Written agreement from STW should be provided to for retention and proposed amendments to this land drainage connection.

- Clarify proposed connection point for site surface water discharge. The Drainage Strategy suggests that STW requested a connection downstream of manhole 1003, but it appears that the proposed connection point is upstream of this at manhole 1001. STW to confirm whether this is acceptable, taking into account hydraulic modelling.

STW has confirmed connection must be downstream of manhole 1003.

The Concept Drainage Sketch (Appendix O) has been amended to state connection to be made downstream of manhole 1003, however page 16 still states 'downstream of Manhole 1001).

This should be updated for clarity.

Surface Water flood risk and mitigation:

- The FRA acknowledges the risk of exceedance of the 150mm piped watercourses, but this should be quantified based on the upstream catchment.

The FRA (p11) suggests the catchment for the re-aligned ditch is 10.6ha, corresponding to a 31.4l/s peak flow during a 1 in 1 year return period. This compares to a pipe capacity of 37.4l/s.

Our data shows a greater catchment area (~16.5ha) which would suggest the pipe capacity would be exceeded more frequently than a 1 in 1 year return period, and to a greater extent.

- Confirm size, ownership and maintenance access to proposed ditch.

To mitigate the surface water flood risk it is proposed that ‘the ditch which is currently shown partly within the site and in the location of proposed development will be re-aligned along the new site boundary.’ (p10)

Under ‘Maintenance’ it is stated that the ditches will be outside the red line boundary and suggested that maintenance will be the responsibility of the adjacent landowner (currently the same owner):

‘Maintenance of the ditches on the eastern and south-western boundary will be the responsibility of the riparian landowner, who also owns the site. The ditches will fall within land beyond the red line boundary and maintenance access is available from the agricultural land south of the site.’ (p18)

Mitigation of surface water risk should not rely on features outside the red line boundary and future maintenance for the lifetime of the development should not rely on current ownership of external land.

- Exceedance flow routes should be formalised into green/blue corridors to minimise the risk of property flooding and consider interaction with the site surface water drainage network.

The Pre and Post Development Exceedance Flow Route Plans (Appendix J) provide insufficient information about how exceedance flows will be directed through the site and away from proposed dwellings.

The calculations on page 11 (see above note about catchment size) show significant exceedance flows and current topography could route flows towards proposed dwellings.

- Include interception of flows entering the SW of the site.

The exceedance routes shown cross the access roads, where they would be intercepted and take up capacity in the proposed site drainage network. How will this be avoided / accommodated?

- Include details of maintenance access for ditches, catch pits, headwalls and pipes.

The FRA states: ‘Maintenance of the ditches on the eastern and south-western boundary will be the responsibility of the riparian landowner, who also owns the site. The ditches will fall within land beyond the red line boundary and maintenance access is available from the agricultural land south of the site.’ (p18)

Access for maintenance should be provided within the site boundary.

Additional Note: The ponds shown in the Concept Drainage Sketch (Appendix O) overlap the footpath shown on the layout.

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.

Many thanks

Chris



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