

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	Outline permission for redevelopment of the former Anzio site for residential dwellings, retail business, amenity space, internal roads, and associated hard/soft landscaping. Including the principal means of vehicular access from the A53 Buxton Road (all other matters reserved). Telford One Limited. Former Anzio Camp Buxton Road, Blackshaw Moor, Leek, ST13 8TN.
Planning application reference	SMD/2026/0052
Type of application	Outline
Date consulted	04/03/2026
Date of response	25/03/2026

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.

General observations / local flooding information

Flood Zone	Flood Zone 1.
Surface water risk	Yes, flow paths shown on updated Flood Map for Surface Water affects site.
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	Yes, there are unnamed ordinary watercourses along the northern and southern site boundaries.
Other observations	n/a

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

Preamble

We have reviewed Flood Risk Assessment & Drainage Strategy Project Number 300362 (dated December 2025). Appendices A through to I are listed in the contents pages but have not been included within the submitted document. In terms of surface water risks, the FRA will need to be updated to provide adequate mitigation measures against the paths of surface water flowing through the Site.

The LLFA have reviewed the information relating to the surface water drainage system and have made comments 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 planning permission is not granted.

The outstanding issues are as below:

1. Updates to FRA & DS Strategy Document

Please provide all Appendices.

Please update the Flood Risk Assessment to provide appropriate mitigation measures for the paths of surface water flowing through/across the site.

Existing routes of surface water flow(s) shall be mitigated against by either maintaining the flow routes via a formal green/ blue corridor or by providing feature(s) to intercept and route surface water around the developable areas of the site to a natural receptor.

Section 6.3.3 advises that finished floor levels of properties will be raised by 300mm above the ground; however, this would still allow surface water to flow through the site and is likely to create ponding of surface water around properties, points of access and egress and the adjacent highway. The raising of finished floor levels should be provided in conjunction with additional measures, as indicated above.

2. Update to Drainage Design

All sections shall be updated to reference that the design will be in accordance with the National Standards for Sustainable Drainage Systems (SuDS).

3. Calculation of Pre-development Discharge Rate

Section 8.3 advises that the pre-development discharge rate is 383.64 l/s.

The rate has been calculated using the Modified Rational Method which includes an existing impermeable area of 2.76ha and a rainfall intensity of 50 mm/hr.

If the applicant wishes to demonstrate the pre-developed discharge rate, FEH point data shall be used to determine the rainfall intensity for a 1 in 2-year return period storm event with a duration of 60 minutes. This will provide a rainfall intensity more in line with the Q/Bar rainfall event and is likely to be significantly less than the currently stated 50 mm/hr.

Alternatively, this section may be removed, and the applicant may simply provide a greenfield Q/BAR discharge rate for the developable area of the site in line with current guidelines for brownfield sites (see point 4).

4. Discharge Rates

Please provide calculations demonstrating the Q/Bar greenfield runoff rate for the site.

It shall be noted that the discharge rate of 5l/s/ha has not demonstrated by a calculation and has been applied to the overall site area of 12 hectares.

The calculation of the greenfield runoff rate for the site shall be provided, and the proposed rate shall be restricted down to the contributing area of the site which is stated as being 7.32ha in Table 8-1. If the rate of 5 l/s/ha is confirmed, this would be a rate of 36.6 l/s, not 60 l/s.

5. Point of Connection

A discharge is proposed to watercourse, and the document shall be updated to include an outline drainage plan to demonstrate which watercourse/ watercourses would be utilised as a point of connection.

The document shall also be updated to provide the information described in Section 8.7.4; the LLFA would expect that a survey be undertaken of any exiting watercourse(s) to which a discharge is proposed to confirm condition and capacity.

In addition, it would need to be confirmed how any watercourse flows beneath the adjacent highway before connecting into the downstream drainage network. Once more, a survey of any infrastructure or pipe

work would be required to demonstrate that infrastructure is in good condition to continue passing surface water generated by the development to the downstream drainage network.

If infrastructure is located beneath the highway to connect to the downstream drainage network, the FRA would also need to assess how the flow of surface water from the Site would be impacted upon by a 50% and 75% blockage of any infrastructure beneath the highway and how this would impact upon flooding at the site and 3rd party land.

6. Attenuation Requirements

Section 8.10.2 states that Causeway Flow drainage design software has been used to estimate the maximum storage volume required on-site for the 100-year storm event plus 40% (30% allowance for climate change and 10% for urban creep).

Climate change and Urban Creep are separate factors.

A 40% factor of Climate change shall be added onto rainfall intensities defined by FEH Rainfall Data. FSR Rainfall Data shall not be used.

Urban creep of 10% shall be added to the overall impermeable area and shall be included in Table 8.1.

As previously stated, the attenuation volume required shall be calculated on a discharge rate based upon the contributing area (inclusive of 10% for urban creep), not the total site area.

7. SuDS Feasibility

Please update Section 9 to demonstrate how the development will comply with the National Standards for Sustainable Drainage Systems (SuDS), including how re-cycling/ re-use of surface water will be provided (Standard 1), how the first 5mm of rainfall for any event will be intercepted (Standard 2) and how water quality, amenity and biodiversity will be provided.

Section 9 shall also commit to providing attenuation storage in above ground features by advising that the detailed design will not utilise oversized pipes or below ground storage in the form of attenuation tanks.

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.

