

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 planning application, with all matters reserved, except for access, for the erection of up to 55 dwellings. Land Off Breach Road, Brown Edge
Planning application reference	SMD/2026/0201
Type of application	Outline
Date consulted	13/05/2026
Date of response	05/06/2026

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, however, additional modelling may be required given the ordinary watercourses are less than 3km ² .
Surface water risk	Yes, flow path shown on updated Flood Map for Surface Water affects site.
Past flooding	The LLFA are aware of flooding issues within the immediate vicinity of the Site. 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, ordinary watercourse interact with the eastern and western site boundaries.
Other observations	n/a

Response:

Thank you for consulting us on this outline planning application. We have reviewed Flood Risk Assessment & Drainage Strategy Report LE25230 FRA03 (15th April 2026) and our response is detailed below.

Proposals and Site Context

The Site is a Greenfield plot, measuring approx. 3.25ha and the proposed scheme shall comprise 55 dwellings with associated access roads and parking.

The site is located upon a parcel of land that slopes towards Breach Road at an approximate gradient of 1 in 15 and is located at the toe of a slope that stretches up to Broad Lane approximately 700m to the north of the site. Due to the topography of the land upstream of the site, there are two ordinary watercourses which drain the land upstream and which are adjacent to the eastern and western boundaries of the proposed development plot.

Western watercourse

The western watercourse has an upstream catchment of 0.19km² and enters a short section or culverted ordinary watercourse on the northern boundary of Spring Crescent. Approximately 90m downstream, the culvert exists Spring View and heads south towards a headwall/ pipe on the north-eastern corner of Meadow View. From here, the LLFA understands that surface water enters the STW adopted network and eventually discharges into the ordinary watercourse to the south of Breach Road. It should be noted that the LLFA are aware of historical flooding issues due to the arrangement outlined above and concerns over flooding have been raised by residents on the planning portal.

The applicant has included a section of swale within the proposed drainage strategy to maintain this path of flow water, however, as a continuation of an ordinary watercourse, the swale would need to be managed and maintained over the lifetime of the development and therefore an accessible maintenance strip would be required to provide access and egress for maintenance activities.

Eastern Watercourse

The eastern watercourse has an upstream catchment of 0.17km² and would form the eastern boundary to the proposed development site. In terms of the development layout, the LLFA would require an accessible easement to this watercourse to enable vehicular access for management and maintenance. The site layout would therefore need to be amended to include an easement of 5m and demonstrate how access to this easement would be available from the main site road(s).

The LLFA's understanding is that the ordinary watercourse enters a headwall located beneath Breach Road and is conveyed west into the STW adopted network which subsequently discharges into the ordinary watercourse to the south of Breach Road. As above, it should be noted that the LLFA are aware of issues of flooding due to a blockage of the headwall located on the upstream side of Breach Road. In addition, it should also be noted that there may be an extent of fluvial flooding associated within watercourse that has not been modelled due to the catchment being less than 3km²; therefore, the applicant's assessment that the site lies within Flood Zone 1 may need to be confirmed by further modelling.

Northern Site Boundary

Our Scalgo Mapping indicates that there are paths of flow water which accumulate within the land to the north of the site and would enter the northern site boundary. A suitable feature would need to be included in the development layout to intercept and route this water to a point of discharge to ensure that surface water does not affect the properties along the northern site boundary.

Surface Water Mapping

Our mapping indicates that the lower part of the site is significantly affected by surface water flooding.

The development layout shows that this would impact upon the attenuation basin and the houses located in the south-eastern most corner of the development plot. The LLFA's understanding is that whilst this path of flow water is likely to have been routed underground via the STW sewer network, we are of the opinion that the sewers in this location are at risk of surcharge due to flows of water coming into the network from the land upstream. Therefore, the LLFA consider that the path of surface water flowing through the site is a risk to the proposed development and would advise that development be located away from this path of surface water to demonstrate that the site layout is sequentially suitable.

We note that the foul section of the FRA and DS Document refers to a pre-development enquiry, however, it has not been attached to the document; therefore, it is unknown whether STW have raised issues over capacity at this location.

Staffordshire County Council Flood Risk Management Position

Insufficient information has been submitted to demonstrate that an acceptable Flood Risk Assessment and Drainage Strategy is proposed.

We would therefore recommend that planning permission is not granted.

Advise to the Applicant

We would propose a meeting be held between the LPA, the LLFA and the applicant/ drainage engineer to discuss the following issues:

- Confirm planning response from STW and review pre-development enquiry;
- Confirm how northern boundary will intercept surface water prior to entry to the site;
- Review of CCTV Surveys in FRA and DS;
- Review development layout, including the southernmost route of surface flows and the confirmation of easement requirements to provide the necessary access for ongoing management and maintenance of adjacent ordinary watercourses;
- Design of conveyance swale for existing route of surface water, including necessary easements (e.g. what are the likely flows and is the swale sized accordingly);
- Requirement for modelling of the eastern watercourse to determine impacts of a blockage in the inlet beneath Breach Road;
- Potential for additional redundancy in design, including reduced discharge rates, additional storage and freeboards etc.,

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

