

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	DOC/2025/0061
Planning application reference	Discharge of Conditions 3, 7, 9, 11, 12, 14, 15, 18, 19, 21,22, 23, 24 in relation to application SMD/2022/0088. Advance Proteins Ltd Bones Lane, Cheddleton
Type of application	Full
Date consulted	30/09/2025
Date of response	20/10/2025

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.

Thank you for consulting us on this discharge of conditions application.

The applicant is seeking discharge of Conditions 3, 7, 9, 11, 12, 14, 15, 18, 19, 21, 22, 23, 24 in relation to application SMD/2022/0088.

Condition 19: No development shall begin until a Surface Water Drainage Design (SWDD) has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. The design must amongst other matters demonstrate the following:-

- a. Finalised Detailed Proposals - Final detailed drainage drawing showing the location of all downpipes and gullies and how they connect with the main drainage network. In addition, the applicant shall submit basic construction details/ drawings for the proposed manholes, filter drains and the green roof. (Reason: to ensure all impermeable areas are connected to the proposed drainage system and that construction detail for the SuDS features are submitted at the planning stage).
- b. Confirmation of Ditch Capacity and Outfall - Additional evidence (capacity calculations along with additional photographs and/ or a survey) to show that the existing land drains and ditches have the capacity to convey runoff emanating from the proposed site. In addition, confirmation that the land ditches connect to the Consall Brook to the south of the site. (Reason: The photographs shown in the land contamination report and the photographic log display ditches which are overgrown, not well defined and may lack the capacity to convey discharges emanating from the development site)
- c. Maintenance and Management - Details of a named individual, developer, or management company to undertake the advised management/ maintenance plan as attached within Appendix C of the FRA. (Reason: to ensure the required management and maintenance of the drainage system is undertaken during the lifetime of the development).

Our response is detailed below.

Preamble

We have reviewed Drainage Strategy Document (Report Ref 2191, dated July 2026). This document is appended by infiltration results, a watercourse assessment, proposed drainage drawings and hydraulic calculations.

It should be noted that Appendix B of the drainage document referenced currently includes a fee proposal to produce the sites surface water drainage system, rather than the watercourse assessment. The watercourse assessment is included upon the planning portal as a separate document; whilst the LLFA are satisfied with its suitability to discharge part b of condition 19, the document would need to be updated as part of any further submission.

Appendix C includes a layout drawing of the proposed drainage system along with detailed design information on infrastructure and SuDS features. Proposed Drainage Layout 2191/001 shows a green roof is included upon the northern most building with permeable paving in northern most car parking spaces. Areas of hardstanding are drained via a full retention separator and an attenuation tank located on the southern elevation of the sites proposed building. These features discharge into a drainage basin on the southern site boundary. A hydrobrake restricts outflows to 7.9 l/s.

Sheet B of this drawing shows a piped connection to achieve a discharge to the Connal Brook to the south, via a headwall. Part b of the condition requested that discharges to the downstream network be assessed as part of a hydraulic assessment. This assessment has been undertaken and concludes:

- *Based on the information detailed above, it can be concluded that the ditch has sufficient capacity and is in sufficient condition to accommodate surface water flows from the proposed development. The existing ditch has also been confirmed to drain to Consall Brook to the south of the site.*

As such, the LLFA would question why a piped connection is required to discharge to the Consall Brook. Has a connection, via existing land drainage, not been proven by the undertaken watercourse assessment? Please update accordingly.

Proposed Drainage Details Drawing (2191/002) shows the design detail of a typical geo-cellular arrangement, manhole and chamber detail, hydrobrake and permeable pavement, however, there are no detailed design drawings of the sites green roof or the proposed attenuation basin.

Hydraulic Calculations have been updated to utilise FEH-22 Rainfall data as previously requested.

A maintenance schedule has been provided; however, it does not reference the associated drawing in the document appendices and does not include the body responsible for undertaking maintenance in the text (although it is shown on the drawing).

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 outstanding issues are as below:

- **Update to Drainage Strategy Document**

Please update Appendix B of this document to include the watercourse assessment. The current document includes a fee proposal for the surface water drainage strategy.

- **Finalised Detailed Proposals**

Please provide a detailed design drawing of the proposed green roof system which has now been re-instated into the design from that previously approved under application SMD/2022/0088.

In addition, please provide a detailed design drawing, including cross sections, details and locations of inlets/ outlets, of the proposed attenuation basin.

- **Exceedance**

Please update the exceedance plan to include the drainage system throughout the development to demonstrate that any overland flows are intercepted by a suitable drainage feature (i.e., gully, ACO drain etc).

- **Management & Maintenance**

Please update the management section to include a reference to the drainage maintenance plan in Appendix C and include the body responsible for maintenance and management in the text of the drainage strategy report, as indicated on the drainage maintenance plan.

Please re-consult us at [REDACTED] 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 [REDACTED] if you have any queries about this response.

