

Lead Local Flood Authority Planning Application response

Lead SCC Officer	Adam Bushnell
Local Planning Authority	Staffordshire Moorlands District Council
Planning application name	Flexible Energy Facility at C&S Energy Limited, Land Adjacent Cellarhead Substation, Rownall Road. (battery storage facility).
Planning application reference	SMD/2021/0695 - (Revision 1)
Type of application	FULL
Date consulted	21/12/2021
Date of response	23/01/2022

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 The Environment Agency should also be consulted for bespoke comments where a development is in Flood Zones 2 or 3
Surface water risk	Yes, a flow path shown on Environment Agency Risk of Flooding from Surface Water mapping, associated with the 1 in 30 and 1 in 100 year return periods affects the southern boundary and south eastern area of the site.
Past flooding	One historic record associated with flooding to the highway on Rownall Road bounding 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	N/a
Other observations	N/a



RESPONSE

Thank you for consulting us on this planning application, our response is as follows:

Advice to LPA:

We ask to be consulted on the details submitted for approval to your Authority to discharge this condition and on any subsequent amendments / alterations. Please also consult us again on any future major changes to the proposed development or drainage scheme.

Staffordshire County Council Flood Risk Management position

The proposed development will only be acceptable if the following planning permission is imposed:

Condition:

The development hereby permitted shall not be commenced until such time as a scheme to demonstrate the following Sustainable Drainage Systems measures, in accordance with the Non-Statutory Technical Standards for SuDS, and the SCC SuDS Handbook, has been submitted to and approved in writing by, the local planning authority in consultation with the Lead Local Flood Authority.

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA), Flood Risk Assessment and Drainage Strategy Report- dated December 2021 – prepared by Armstrong, Stokes, and Clayton Limited. Reference: AVON100 Battery, Storage Facility, Rownall Road, Staffordshire Moorlands, FRA - Rev B.

- Surface water drainage system (s) designed in accordance with the Non-Statutory Technical Standards for sustainable drainage systems (SuDS), DEFRA, March 2015).
- The primary means of surface water discharge to be considered, in accordance with the Non Statutory Technical Standards for Sustainable Drainage Systems drainage hierarchy is by means of soakaway and infiltration. Therefore full and complete infiltration testing is to be carried out, in accordance with BRE 365 best practice guidance, to assess the viability of infiltration soakaways.
 - A testing report, in complete concordance with BRE 365 best practice guidance is to be submitted to the LLFA to demonstrate whether or not infiltration is a viable means of surface water discharge. Should the testing demonstrate the viability of soakaways, then a full detailed drainage design, on the basis of soakaways, is to be submitted and approved by the LPA in

consultation with the LLFA prior to any development commencing.

- Should infiltration testing show soakaways not to be viable, then the following measures, as detailed as a secondary means of sustainable drainage in the submitted FRA should be submitted in a full detailed design, and approved by the LPA in consultation with the LLFA prior to any development commencing.

The following mitigation measures detailed with the FRA should be adhered to in the detailed design to be further reviewed and approved prior to any development- should soakways prove unviable, as above.

- Limiting the surface water run-off generated by all events up to and including the 1 in 100 year plus (40%) climate change, critical storm return period to the greenfield QBAR discharge rate of 20.6 l/s and not increase the risk of flooding off-site.
- Provision of at least 2270.4 m³ attenuation flood storage on the site to a 1 in 100 year plus (40%) climate change standard
- The incorporation of adequate surface water treatment in accordance with CIRA C753 – The Simple Index Approach, to mitigate water pollution and maintain surface water quality
- Detailed design (plans, network details and calculations), in support of any surface water drainage scheme, including details of any attenuation system and the outfall arrangements. Calculations should demonstrate the performance of the designed system for a range of return periods, and storm durations inclusive (as a minimum), of the 1 in 1 year, 1 in 2 year, 1 in 30 year, 1 in 100 year and 1 in 100 year plus (40%) climate change return periods.
- Plans illustrating flooded areas and flow paths in the event of exceedance of the drainage system.
- Provision of an acceptable management and maintenance plan for surface water drainage to ensure that surface water systems shall be maintained and managed for the lifetime of the development.

Reason:

To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site.

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

