

Lead Local Flood Authority Planning Application Response

Lead SCC Officer	Henry Wood
Local Planning Authority	Staffordshire Moorlands District Council (SMDC)
Planning application name	Development of a Battery Energy Storage System (BESS) with ancillary infrastructure, security fence, access, landscaping and biodiversity enhancements, to provide balancing services to the local electricity grid.
Planning application reference	SMD/2022/0180
Type of application	Full
Date consulted	28/04/2022
Date of response	16/05/2022

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	The site is within FZ1
Surface water risk	Yes, the updated Flood Map for Surface Water (uFMfSW) does affect the proposed site area. The northern portion of the site is affected by surface water flooding during the 1 in 30-year event. Small areas of localised flooding are shown along the length of the unnamed watercourse flowing adjacent to the site's western boundary. In addition, there is localised surface water flooding shown in the vicinity of an existing land drain which heads towards the sites north-western boundary. During the 100-year rainfall period, there is the start of a route for surface water to flow through the northern end of the development site. Surface water is shown to pool on the access road to the east of the site before heading west through the development site toward the unnamed watercourse along the site western site boundary. This flow path becomes more evident during the 1000-year rainfall event with the extent of surface water flooding also affecting a greater area within the northern areas of the development site.
Past flooding within 20m of site	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. A drainage ditch runs through the northern portion of the site. In addition, an unnamed watercourse is present along the length of the site's western boundary. Should any works to develop the site affect the flows within these channels, watercourse consent shall be required from the LLFA.
Other observations	None.

RESPONSE

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

Staffordshire County Council Flood Risk Management position

We have reviewed the submitted evidence, including the Flood Risk Assessment & Surface Water Drainage Assessment report (KRS.0612.002.R.001.B, dated March 2022).

We would recommend that planning permission is not granted until the following issues have been addressed, and when an updated FRA and Drainage Strategy have been provided:

1. Confirmation of Final Surface Water Drainage Design

The FRA and Surface Water Drainage Assessment provides 2no. 'outline' surface water drainage options.

The applicant shall finalise the drainage design based upon 1 of the submitted options and update the FRA and Drainage Assessment accordingly.

Infiltration testing to BRE365 standards should be undertaken to confirm suitability of the ground conditions for infiltration methods for surface water drainage option 1.

The results from the infiltration testing shall determine the confirmation of the final drainage option in line with the hierarchy of surface water disposal as described in Part H of the Building Regulations.

2. Final Detailed Design Drawings and Calculations

Following confirmation of the proposed drainage option, the applicant shall provide a final detailed design of the chosen surface water option.

Drawings should provide all relevant information to the proposed design, including details on drainage ditches or pipes (i.e., width, depth, side slopes, gradient etc.) and details of attenuation features (i.e., depth of basins, side slopes, invert, and outfall levels of headwalls etc.), outfall arrangements and discharge rates.

If discharge to a watercourse is to be promoted, please provide performance calculations to demonstrate the performance of the surface water system at the 1-year, 30-year, and 100-year +40%



rainfall events. A limited outfall of 5 l/s is considered applicable as detailed within the FRA.

If infiltration options are to be proposed, please provide all details of soakaways or infiltration methods (i.e., swales etc) based upon site specific infiltration rates.

3. Maintenance and Management of SuDS Design

The applicant shall provide a management and maintenance plan for the chosen surface water drainage system to ensure that surface water drainage systems shall be maintained and managed for the lifetime of the development.

The plan should identify a named individual or management company to undertake the required maintenance of the drainage system over the lifetime of the proposed development.

Advisory

Ordinary Watercourse Consent

The proposals are in an area where existing land drains are present. Should any works to develop the site affect the flows within these channels, watercourse consent shall be required from the LLFA.

Section 2.13 of FRA and Drainage Assessment

Please review and update the wording of Section 2.13 which appears to have the wrong title and the last sentence appears to be missing.

Section 5.5.2 of FRA and Drainage Assessment

Please review and update the wording of Section 5.5.2 which refers to a 'connection to the road drain or public sewer'. The LLFA believe this should read that a connection to a watercourse is proposed.

In addition, and within this same section, a reference is made to Appenidx 3 which has not been provided. Please update the FRA and Drainage Assessment with the finalised drainage design attached for reference.

Please re-consult us at flood.team@staffordshire.gov.uk when amended details are received. 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.

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From: [Wood, Henry \(EXT\)](#)
To: [Planning \(SMDC\)](#)
Subject: App ref SMD/2022/0180 - LLFA Response - objection - updated information required
Date: 16 May 2022 15:05:07
Attachments: [E_704303.DOC](#)
[20220516 SMD-22-0180-FUL Batt Storage, Newfields Farm - LLFA Response.pdf](#)

Good afternoon,

Please find attached the LLFA Response to application SMD/2022/0180.

As per the attached correspondence, we require updated information be able to remove our objection with regard to the surface water arrangement for the proposals.

Many thanks

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My working days are Monday to Thursday

-----Original Message-----

From: Planning (SMDC) <Planning@staffsmoorlands.gov.uk>
Sent: 28 April 2022 12:10
To: Flood Risk Management Team <flood.team@staffordshire.gov.uk>
Subject: External Consultation Letter - App ref SMD/2022/0180

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