

Staffordshire Moorlands District Council
Development Control
Moorlands House
Stockwell Street
Leek
Staffordshire Moorlands
ST13 6HQ

Our ref: SV/2023/112143/01-L01
Your ref: SMD/2023/0594
Date: 15 December 2023

Dear Sir/Madam

**INSTALLATION OF A SOLAR ARRAY, SUBSTATION AND ASSOCIATED WORKS
FORMING AN EXTENSION TO BLYTHE SOLAR FARM (REF: SMD/2022/0160)**

**LAND AT BLYTHE HOUSE FARM, SOUTH OF THE A50 DRAYCOTT IN THE
MOORS ST10 4JN**

Flood Risk:

The site is (partially) located in Flood Zones 2 and 3, which are the medium and high-risk zones respectively and are defined for mapping purposes by the Agency's Flood Zone Map. Whilst slight encroachment into Flood Zones 2 and 3 it should be noted that the majority of the site falls within Flood Zone 1, the low risk Zone.

The River Blythe (designated Main River) lies to the south and the small watercourse that runs along the eastern edge of the proposed development is classed as an 'ordinary watercourse' and therefore falls under the jurisdiction of your Council as the Lead Local Flood Authority (LLFA).

Sequential Test:

The NPPF details the requirement for a risk-based Sequential Test (ST) in determining planning applications. See paragraphs 161–162 of the NPPF and paragraphs 027-029 within the Flood Risk and Coastal Change Section of the NPPG.

The NPPF requires decision-makers to steer new development to areas at the lowest probability of flooding by applying a ST. It states that 'Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'.

Further detail is provided in the NPPG; 'Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test (ET) if required.

We would not make any bespoke comments on the ST, in this instance, although it is noted that this is a proposed extension to an existing site. The fact that we are not providing comments does not mean that there are no ST issues, but we leave this for your Council to consider.

Annex 3 of the NPPF confirms that Solar Farms are considered as 'Essential Infrastructure'. When considering Table 2: Flood risk vulnerability and flood zone 'incompatibility' within the NPPG this use would not be considered incompatible with the Flood Zone 3 subject to consideration of the Exception Test as detailed below.

Exception Test:

If, following application of above, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, for development within Flood Zone 3, the Exception Test should be applied.

We would recommend that you be satisfied on part 1 of the ET i.e., it must be demonstrated that the development provides "wider sustainability benefits to the community that outweigh flood risk".

In relation to matters within our remit, Part 2 of the ET states that "a site-specific flood risk assessment must demonstrate that the development will be "safe for its lifetime taking account of the vulnerability of its users without increasing risk elsewhere, and, where possible, will reduce flood risk overall".

In line with the Notes to the abovementioned Table 2 Essential Infrastructure in Flood Zone 3a should be designed and constructed to remain operational and safe in times of flood.

You should be satisfied sequentially with development in this location and that the above considerations would make it an acceptable location for a development of this vulnerability partially located in an area of high flood risk. Providing you are satisfied we would offer the following comments on the FRA.

Flood Risk Assessment (FRA):

As stated above, and confirmed within the submitted FRA, the site lies predominantly within Flood Zone 1 (low). Based on the scale and nature of the proposed development we would not request site-specific modelling be undertaken to ascertain the most accurate flood information in this instance. We accept that the associated infrastructure is all located in Flood Zone 1 and that, whilst a small area of solar panels fall partially within an area of flood risk, the panels themselves will be set at a minimum of 800mm above ground level. Raising the panels on narrow-legged metal frames or plinths/stilts, given the limited extent of the site with Flood Zones 2 and 3, will ensure there will be a negligible reduction in floodplain storage capacity.

Note: The FRA and associated drawings refer to installation of security fencing with mesh spacing of 150mm which is in line with conditions for fences along Main Rivers which the Environment Agency regulates.

Yours faithfully

Miss Aileen Parry
Planning Officer
Direct e-mail