

Lead Local Flood Authority Planning Application Response

Lead SCC Officer	Jake Jones
Local Planning Authority	Staffordshire Moorlands District Council (SMDC)
Planning application name	Battery Energy Storage System and substation with associated infrastructure and works. Greenfields Thorney Edge Road Bagnall
Planning application reference	SMD/2024/0423
Type of application	Full
Date consulted	09/10/2024
Date of response	30/10/2024

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 point of fields F2 and F6 have isolated surface water pooling during the 1 in 30-year adjacent to the northern unnamed watercourse. This flow path becomes more evident during the 1000-year rainfall event with the extent of surface water flooding. In an extreme event site ingress and egress could be restricted for this access track. The southern boundary of field F4 has localised surface water flooding from 1 in 30-year as the southern unnamed watercourse follows the site perimeter.
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. There are two unnamed ordinary watercourses touching the perimeter of the site. The surface water mapping is attributed to the ordinary watercourses with pooling in the northern extent of the fields F2 and F6 and surface water risk on the southern boundary of field F4.
Other observations	The proposed site infrastructure is mainly outside of the surface water risk zones but it a high or medium risk event would affect access and egress to the site

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

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We have reviewed the Flood Risk Assessment Document (SHF.348.007.HY.R.001.A August 2024) and Drainage layout documents (SHF.348.007-ENZ-XX-XX-DR-0009,) (SHF.348.007-ENZ-XX-XX-DR-0010, SHF.348.007-ENZ-XX-XX-DR-0010)

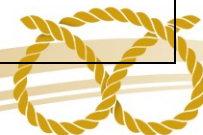
We would recommend that planning permission is not granted until the following issues have been addressed, and when an updated drainage layout has been provided:

1. Detailed Drainage drawing

- Pipe reference numbers on the drainage layout shall be clearly annotated with corresponding pipe lengths so that they can be identified clearly. The detailed design drawing is to be cross-referenced directly with the hydraulic modelling calculations and so the two should match up.
- All designs for an application at Full planning stage shall be final, confirmed and clear. Uncertain terms used such as 'S68 flow rates to be agreed' and 'oil interceptor to be considered' which lacks design details are not satisfactory or acceptable.
- Please may the LLFA request the applicant includes on their drainage layout an annotation detailing the 1in100yr+40% storm event maximum water level with remaining freeboard height for each basin.

2. Blue/Green SUDs

- The innovative delivery of "Blue/Green" SUDs enables holistic surface water management to be achieved. The four pillars of SUDs (water quantity, water quality, amenity and biodiversity) must be promoted and prescribed for in development schemes where feasible. Open features such as swales, basins, rain gardens and tree pits allow this innovative best practice and shall be considered. Subterranean pipes and tanks are to be generally avoided. More consideration for swales and basins being used instead of Aquacell storage as innovative best practice. Generally, there is increased maintenance required for tanked and pipe storage solutions compared to open SUDs.



The above listed points may not necessarily be exhaustive at this stage please may the LLFA request each point is fully and directly addressed in turn, once this has been achieved the LLFA will welcome re-consultation with the revised information and detail for their further review.

Advisory

Ordinary Watercourse Consent

Under the Land Drainage Act (1991) Ordinary watercourse consent should be acquired from SCC if works effect a watercourse. The proposals are in an area where existing ordinary watercourse are present. Should any works to develop the site affect the flows within these channels, watercourse consent shall be required from the LLFA.

<http://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Watercourse-works>

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.

