

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
Planning application name	Environmental Impact Assessment (EIA) Scoping Opinion for a proposed development of Tean Leys Battery Storage Tean Leys Farm Tean Leys Lower Tean
Planning application reference	SMD/2024/0536
Type of application	SCOPING
Date consulted	23/12/2024
Date of response	13/01/2025

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.

General observations / local flooding information

Flood Zone	- The site is primarily located within Flood Zone 1 (including the main battery storage compound). - Some of the cabling route is located in Flood Zones 2 and 3 of the River Tean <i>(the EA should be consulted for bespoke comments)</i>
Surface water risk	- Much of the surface water risk shown in the EA data appears to indicatively represent fluvial flooding. - A surface water flow path crosses the proposed cabling route originating around Benthouse Farm. - There are surface water flow routes crossing the cable route on Cheadle Road, New Road and High Street Upper Tean. - There is a flow route for surface water originating within the proposed compound area.
Past flooding	- There is significant recorded historical flooding within Upper Tean. - 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	The Detailed River network shows: - The River Tean (main river) adjacent to the proposed cabling route on Riverside Road Upper Tean. - An unnamed ordinary watercourse outfalls into the River Tean at Riverside Road - Two unnamed ordinary watercourses drain to the south into the River Blithe under the railway embankment which pass through and adjacent to the approved substation. - Two unnamed ordinary watercourses pass under the proposed access track route to the south of the A50 which

	join the River Blithe to the south-west of the site.
Other observations	Already approved application SMD/2023/0954 for a substation forms part of the site boundary - LLFA not consulted.



Response:

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

Staffordshire County Council Flood Risk Management position

The site is over 1ha and therefore will require a Flood Risk Assessment and Drainage Strategy.

A drainage strategy should be commensurate with the requirements of the Staffordshire SuDS Handbook and complete the Appendix A proforma.

In general, any surface water drainage scheme should demonstrate, but not necessarily be limited to, the following:

- Surface water drainage system(s) designed in accordance with the Non-technical standards for sustainable drainage systems (DEFRA, March 2015).
- Provision of surface water runoff attenuation storage.
- Detailed design (plans, network details and calculations) in support of any surface water drainage scheme, including details on 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.
- 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 drainage systems shall be maintained and managed for the lifetime of the development.
- Provision of supporting information to demonstrate that sufficient water quality measures have been incorporated into the design. This should be in accordance with the CIRIA SuDS Manual Simple Index Approach and SuDS treatment design criteria.
- Evidence of compliance with the principles of the drainage hierarchy, as described in Part H of the Building Regulations. If applicable, evidence of infiltration testing in accordance with BRE365 should be provided. If discharge is proposed to a surface water sewer then evidence should be provided regarding permission to connect.

Site Specific Points that should be addressed are:

- We do not support the culverting of watercourses under Local Standard J of the Staffordshire SuDS Handbook except where this is the only available route for access. The proposed access track crosses two ordinary watercourses the FRA needs to address how the fluvial flood risk will be managed if watercourses must be culverted under new proposed access track. At the first point please consider relocating access tracks to avoid the need for culverting watercourses. If this is not possible. We will need a comprehensive analysis of the impact of culverting on fluvial flood risk. This should include:
 - Modelling the baseline impact of the culvert on the fluvial flood risk and the impact of culverting to determine a suitable pipe size.
 - A modelled blockage assessment.
 - A comprehensive and robust maintenance strategy to ensure that culverts do not become locked.
- A 6m buffer should be retained around ordinary watercourses for access and maintenance.
- The cabling route should not alter any topography (where this would have a negative impact on flood risk or drainage both to the site and to third parties) or import any additional material especially in the areas of surface water and fluvial flood risks.
- There is significant recorded historical flooding surface water and fluvial flooding within Upper Tean which should be considered within the FRA. The FRA and drainage strategy should consider the fluvial and surface water risk from the compound, cabling route and access track proposals and the development should cause no increased risk to third party land.
- The surface water flow route originating on the compound area of the site should be considered to ensure flood risk is not made worse for third party land.
- All access tracks should be permeable as far as possible.
- We would expect above ground multi-benefit SuDS to be used on this site.
- The site would require a comprehensive surface water CEMP to ensure the impact of construction on flood risk and water quality can be managed.

Land Drainage Consent

Please note that any amendments to existing watercourses and additional structures such as headwalls/culverts etc will require Land Drainage Consent through this office. This is a separate process to planning.

Please contact us if you have any queries about this response.

