Staffordshire County Council

Lead Local Flood Authority Planning Application Response

Lead SCC Officer	
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	13/06/2025
Date of response	**25/06/2025**

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 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 full planning application.

Our response is detailed below.

Preamble

We have reviewed the Addendum to the Environmental Statement Non-Technical Summary (June 2025) which outlines amendments to the design of the proposed development, including a reduction in building height and improved screening to reduce visual impacts. We note that the proposed site plan shows that some of the infrastructure has been removed.

We previous reviewed a response (SHF.348.007.L.001.A, 24th February 2025) produced to address the comments of the LLFA and we do not believe that the proposed changes materially affect the principles of the agreed drainage system.

This document above is appended by the following drawings:

- Drainage Layout Sheet 1 - SHF.348.007-ENZ-XX-XX-DR-0010 – P02 – 18/02/2025
- Drainage Layout Sheet 2 - SHF.348.007-ENZ-XX-XX-DR-0010 – P02 – 18/02/2025
- Drainage Layout Sheet 3 - SHF.348.007-ENZ-XX-XX-DR-0011 – P02 – 18/02/2025

In addition, performance calculations have been provided, and the information demonstrates that a surface water drainage system can be achieved in principle with an outfall to existing watercourses.

Surface water runoff discharging from the Site shall be restricted to the rates shown on the submitted drainage layouts. Attenuation shall be provided in the form of attenuation basins and geo-cellular tanks.

Oil interceptors are to be provided at each point of offsite discharge.

Staffordshire County Council Flood Risk Management Position

We have no objection to the application at this stage subject to the pre-commencement condition below being attached to any planning permission, to ensure that the full detailed drainage design; management and maintenance plan and surface water management plan (SWMP) is submitted for review.

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.

Condition

No development shall begin until the final detailed surface water drainage design has been submitted to and approved by the Local Planning Authority in consultation with the Lead Local Flood Authority.

The final design must conform to the design detail summarised in the response document referenced SHF.348.007.L.001.A and dated 24th February 2025.

The design must further demonstrate:

- A surface water drainage system designed in accordance with the non-technical standards for sustainable drainage systems (DEFRA, March 2015).

- Restricted discharge rates as shown on the approved drainage layouts and attenuation storage to achieve restricted rate.

- The use of proprietary treatment systems at each outfall to provide water treatment prior to discharge off site as shown on the approved drainage layouts.

- Detailed design (plans, network details and full hydraulic calculations) in support of any surface water drainage scheme, including a manhole schedule, details on any attenuation system (basins and tanks), flow control devices, SuDS features and the outfall arrangements (headwalls etc.,).

- Performance calculations should demonstrate the performance of the designed system and attenuation storage for a range of return periods and critical storm durations (15 mins up to 48 hours), to include as a minimum the 1:2 year, 1:30 year and the 1:100-year plus climate change return periods.

  The hydraulic modelling design shall use FEH Rainfall Data and shall apply a 40% allowance upon rainfall to model the impact of climate change.

- A plan showing the total impermeable/ permeable areas of the development layout shall be submitted alongside the drainage design to confirm the contributing areas within the hydraulic model.

- Plans illustrating flooded areas and flow paths in the event of exceedance of the drainage system.

- Provision of an acceptable management and maintenance plan to

ensure that surface water drainage systems shall be maintained and managed for the lifetime of the development.

To include the name and contact details of the body(-ies) responsible.

- Provision of an acceptable surface water management plan (SWMP) plan to ensure that surface water runoff and contamination is temporarily intercepted, stored, treated, and discharged from the site during any demolition and/ or construction phases.

The development shall thereafter proceed in accordance with the approved details.

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 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 if you have any queries about this response.