

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 (SMDC)
Planning application name	Battery Energy Storage System (BESS) and associated infrastructure. New House Farm Luzlow Lane Bagnall
Planning application reference	SMD/2024/0568
Type of application	Full
Date consulted	02/09/2025
Date of response	16/09/2025

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	Flood Zone 1
Surface water risk	Yes, flow path shown on updated Flood Map for Surface Water affects site/
Past flooding	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 is an ordinary watercourse shown on the site's northern boundary.
Other observations	n/a

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

Preamble

We have reviewed revision P05 of the Drainage strategy Report the (P16021-GOO-XX-XX-RP-C-0500 – 20.06.25) which demonstrates that a surface water drainage system can be achieved in principle.

The document (appended by proposed drainage schematic P16021-GOO-XX-XX-SK-C-0541 – Revision P02) demonstrates that a surface water outfall can be made to the northern Ordinary Watercourse in accordance with the drainage hierarchy.

The drainage schematic shows that the main compound shall be created out of permeable surfacing/ materials and all surface water generated by the development will be collected by a gravity-based pipe network to convey surface water to the western boundary of the BESS. A penstock is included prior to the attenuation basin which has been designed to provide storage for all events up to the 100-year event, plus an allowance of 30% for climate change.

A flow control restricts discharges to the northern watercourse to the Greenfield, Q/Bar runoff rate of 6.6 l/s.

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 Drainage strategy Report (P16021-GOO-XX-XX-RP-C-0500 – 20.06.25) and the appended drainage schematic drawing (P16021-GOO-XX-XX-SK-C-0541 – Revision P02).

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).
- BRE-365 Infiltration Testing to demonstrate whether a full or partial discharge to ground via infiltration is feasible in the detailed drainage design.
- Restricted discharge rate of 6.6 l/s to northern ordinary watercourse.
- Attenuation storage to achieve restricted rate.
- Detailed design (plans, network details and full hydraulic calculations) in support of any surface water drainage scheme, including details on any Fire Suppression Tanks, Attenuation Systems (cross sectional drawings of attenuation basin), Penstock(s), Flow Control Devices and the outfall arrangements.
- 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 30% 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.
- Finished floor levels are to be set 150mm higher than ground levels to mitigate the risk from exceedance flows. In all cases, the surrounding ground level shall slope away from the finished floor level of properties and any entrances to mitigate against the risk of surface water inundation.
- 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.

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

