

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	Discharge of condition 18 in relation to SMD/2022/0444. Land East of Cellarhead Substation Rownall Road Wetley Rocks
Planning application reference	DOC/2025/0028
Type of application	Discharge of Conditions
Date consulted	30/04/2025
Date of response	13/05/2025

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.

Thank you for consulting us on this discharge of conditions application.

The applicant seeks discharge of Condition 18 of decision notice SMD/2022/0444.

Our response is detailed below.

Preamble

The design of the approved drainage system is detailed in the Flood Risk Assessment & Drainage Strategy Report of July 2022 (Ref AVON100 Battery Storage Facility, Rownall Road, Staffordshire Moorlands FRA Rev C).

The principle of the design is to limit discharges of surface water from the site to the Q/Bar Greenfield runoff rate. To achieve the restricted rate, a Hydrobrake is to restrict outflows from the site and attenuation/ storage is to be provided in the form of an attenuation basin. The principle of the approved drainage system is that all surface water generated by the development be conveyed to a point of outfall by gravity.

Since submission of the original application (SMD/2022/0444), detailed design work has confirmed that the topography of the Site prevents a gravity connection from the site to the attenuation pond; therefore, an additional pump has been included within the design submitted for the discharge of Condition 18.

It should be noted that the inclusion of a pumped system is a deviation away from the approved design which in principle, relies on gravity. In addition, a pumped system provides a management and maintenance liability and due to the proposed location of the pump (as shown upon the Drawing - General Arrangement Option 2 Sheet 2), it may also represent a risk to 3rd party land.

In the event of pump failure, surface water would not be able to be pumped up to the sites attenuation basin and surface water would pool at the southern boundary before being routed out of the Site by the natural topography.

The use of pumped systems to achieve a point of connection/ outfall to a receptor is considered as a last resort by the LLFA and it should be noted that additional discussions between the applicant and the LLFA have demonstrated that a gravity solution is feasible. By repositioning the drainage basin along the southern boundary of the Site, surface water generated by the development can be conveyed to the basin and subsequently to a point of discharge by gravity. This arrangement also reflects the natural drainage route for surface water prior to development.

Staffordshire County Council Flood Risk Management Position

Insufficient information has been submitted to demonstrate that an acceptable drainage strategy is proposed. We would therefore recommend that the Condition is not discharged at this time.

Principally, the LLFA objects to the use of a pumped system to achieve a connection to the sites drainage basin as the principle of the agreed system

is that a gravity connection be provided to the sites attenuation feature and subsequent point of discharge.

A gravity solution, reflecting natural drainage paths of the existing land, has been demonstrated as being achievable on the site; therefore, this would be the LLFA's preferred drainage arrangement.

Advisory

If a pumped solution is required (due to the refusal of the scheme under NMA/2025/0009), then the applicant would have to provide additional attenuation within the drainage design, at the location of the additional pump.

This would allow for surface water to be stored in the event of pump failure and to prevent surface water from affecting the proposed development, pumping system and 3rd party land.

Please contact us on flood.team@staffordshire.gov.uk if you have any queries about this response.

