

From: [REDACTED]
To: [REDACTED]
Subject: Comment Received from Public Access
Sent: 10/11/2025 14:47:48

Application Reference No. : DOC/2025/0078
Site Address: Land Adjacent Cellarhead Substation Rownall Road Wetley Rocks Staffordshire
Comments by: Wendy Johnson
From:

Station Road
Cheddleton
Leek

Phone: [REDACTED]
Submission: Objection
Comments:

Subject: Objection to Discharge of Conditions ĳ DOC/2025/0078 (SMD/2022/0548)

Date 10th November 2025

I am writing to object to the discharge of conditions 3, 9, 12, 14, 18, 24 and 25 under planning application DOC/2025/0078, relating to the Battery Energy Storage System (BESS) at Cellarhead Substation, on the following grounds:

Condition-Specific Concerns

Condition 3 ĳ Materials and Lighting

The acoustic fencing specification (134mm x 34mm ĳVĳ boards) lacks clarity on acoustic performance and visual impact.

The entire site is proposed to be gravel-surfaced. The depth of gravel and extent of soil removal are not specified, raising concerns about drainage, compaction, and ecological disruption.

Lighting proposals claim compliance with bat guidance, but no independent ecological endorsement is provided. Emergency lighting on PIR sensors may still cause disturbance if not strictly controlled.

Condition 9 ĳ Construction Method Statement

The CMS outlines up to 40 staff on site with only 20 designated parking spaces. This risks overflow onto local roads, contrary to assurances.

The public footpath Cheddleton 60 runs along the access road. The proposed banks-person arrangement is insufficient to mitigate risks to pedestrians during peak HGV movements.

Critically, there has been no consultation with the British Horse Society, despite Rownall Road and the surrounding lanes being regularly used by horse riders. The absence of equestrian safety measuresĳsuch as signage, speed restrictions, or designated passing zonesĳposes a serious risk to riders and animals during the construction phase.

No detailed traffic volume estimates are provided. The impact of HGVs on Rownall Road and Mill Lane, especially during early morning hours, is understated.

Conditions 12 & 14 ĳ Landscaping and Maintenance

The landscape mitigation relies heavily on bunds and peripheral planting. There is little immediate screening, and juvenile planting will take years to establish. There is no consideration of seasonal loss of leaves that will reduce the amount of screening.

The maintenance plan references biodiversity gains on land outside the planning boundary. This cannot be considered a valid offset under planning law, as it falls outside LPA control.

Existing trees and hedgerows are said to be retained, but no Tree Protection Plan or enforcement mechanism is provided. What guarantees exist if damage occurs?

Condition 18 ¿ Minor Tree Works

The Schedule of Minor Tree Works is not publicly available. Without transparency, it is impossible to assess whether tree works are proportionate or ecologically justified.

Condition 24 ¿ Temporary Construction Compound

The compound will host up to 40 staff, with hardstanding described but not specified. What materials are used? What excavation is required? How will runoff be managed?

The compound is adjacent to sensitive hedgerows and pasture. No buffer zones or ecological safeguards are detailed.

Condition 25 ¿ Site Access Design

The southern access design includes kerbing and tarmac works extending into the existing carriageway. No swept path analysis or visibility splay data is provided.

The photographic survey is useful but does not substitute for a structural assessment of road integrity pre- and post-construction.

Procedural and Oversight Issues

Several conditions rely on drawings and documents that are not publicly accessible or lack independent verification.

The discharge application assumes compliance without demonstrating enforceable monitoring or accountability mechanisms.

The reliance on off-site biodiversity and vague ecological commitments undermines the integrity of the planning process.

Conclusion

In light of the above, I respectfully request that Staffordshire Moorlands District Council refuse the discharge of conditions under DOC/2025/0078 until:

Full technical specifications and ecological endorsements are provided;

Independent monitoring and enforcement mechanisms are established;

Off-site biodiversity claims are excluded from compliance calculations;

Public safety and amenity impacts¿including equestrian safety¿are reassessed with full transparency;

The British Horse Society is consulted and equestrian mitigation measures are incorporated.

Yours sincerely,

Wendy Johnson

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