

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 20 in relation to SMD/2022/0548. Land Adjacent Cellarhead Substation Rownall Road, Wetley Rocks.
Planning application reference	DOC/2025/0103
Type of application	Discharge of Conditions
Date consulted	08/12/2025
Date of response	30/12/2025

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 20 of decision notice SMD/2022/0548.

Our response is detailed below.

Preamble

We have reviewed the Surface Water Drainage Design Note (SPL/CH/201125: 28th November 2025) which demonstrates that surface water generated by the development site can be discharged to ground via infiltration. Infiltration has been proven as feasible by on site BRE-365 Infiltration Testing.

The area of the BESS is to comprise of gravel surfacing, and any excess surface water is to be collected by a perimeter filter drain which shall convey surface water to the northern infiltration basin or southern crate storage system which allows for sub-base infiltration.

In the northern part of the site, the substation requires a pumping system to discharge surface water into the northern infiltration basin.

The layout of the drainage system and all detailed design drawings are included within Appendix A.

The type and frequency of management requirements for the drainage system are included in the Maintenance Plan (SRE1165/MS/01). The arrangement for dealing with spillages (Section 4.7) suggests that major spillages be isolated by means of the use of turf or a bung, however, the LLFA would consider that a more appropriate engineered solution be incorporated into the scheme (for example, penstocks, valves etc.). The plan should also be updated to provide information on how firefighting water would be isolated/ contained, processed and removed from site following any fire incident.

Staffordshire County Council Flood Risk Management Position

Insufficient information has been submitted to demonstrate that an acceptable management and maintenance plan is provided. We would therefore recommend that the Condition is not discharged at this time. The outstanding issues are as below:

- **Emergency Arrangements**

Please update the Drainage Design Note and the Maintenance Plan to include mitigation measures for dealing with emergencies, such as serious spillages and/ or the containment and removal of firefighting water following the suppression of a fire.

All surface water generated by the site shall be passed into infiltration systems; therefore, any contaminants etc., are likely to be routed into groundwater if appropriate mitigation measures are not included.

Please re-consult us at flood.team@staffordshire.gov.uk when amended details are received.

Please note that the issues highlighted above are not necessarily exhaustive.

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 flood.team@staffordshire.gov.uk if you have any queries about this response.

