



Fisher German LLP  
Severn Trent Water Limited

Installation of 1 no. Plumbosolvency (PO4)  
dosing kiosk at Cresswell Water Pumping  
Station, Cresswell Road, Staffordshire.

## Planning, Design & Access Statement

on behalf of:	<b>Severn Trent Water Limited</b>
by:	Oliver Pennington
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revision:	001

## Severn Trent Water

Severn Trent Water Limited (STWL) is a regulated business with statutory responsibilities for the provision of water and sewerage services to over eight million people in an area of 21,000 square kilometres stretching from the Bristol Channel to the Humber, and from mid-Wales to the East Midlands.

Severn Trent Water is currently implementing its Asset Management Plan for AMP6 (April 2015 to March 2020), which is the mechanism by which the regulator OFWAT defines in a five-year capital expenditure programme for all water companies. Investment during the AMP6 period is in response to a number of key drivers. These drivers include providing a continuous supply of quality water, dealing effectively with waste water, and promoting an effective regulatory regime.

## Scope of project/background

This statement has been prepared on behalf of STWL to support a planning application for the installation of a new PO4 dosing kiosk on land at Cresswell Water Pumping Station, Cresswell Road, Staffordshire, ST11 9RB.

The application should be read in accordance with the following documents, as enclosed:

- Site Location Plan – A6W11720-XA00000 Rev A
- Existing Site Layout Plan – A6W11720-XA00010 Rev A
- Kiosk Elevations – A6W11720-PA00110 Rev A
- Planning Site Layout- A6W11720-PA00020 Rev A

## STWL/External Driver

Phosphoric acid is dosed (Phosphate – PO4) at 84 sites across STWL to mitigate against Lead in pipes leaching into customer's water supplies. 11 sites have been identified as high priority for maintenance or replacement based on water quality, condition and obsolescence.

To ensure compliance with the Water Quality Regulation 29 (KPI 9) and to maintain water treatment to minimise contamination from pipes; risking public health and significant reputational impact from the Drinking Water Inspectorate and the public, STWL need to dose Phosphate at sites where a risk of plumbosolvency has been highlighted. Addressing sites that are failing to adequately dose due to asset condition will ensure compliance with water quality regulations and associated reputational impact, as well as reduce the risk of further Lead sample compliance failures.

In addition, there are a number of sites that have been identified as having Chem-E-Safe equipment which does not meet standards and poses a risk to health and safety, dosing rates or environmental pollutions if a spillage of Phosphoric Acid were to occur.

It is therefore proposed to replace the PO4 dosing rigs at 11 sites, which have been selected through a prioritisation process and also address the Chem-E-Safe compliance issues identified. Cresswell Water Pumping Station is one of the 11 identified sites and is the subject of this planning application.

## Site location/description

The proposed development is situated at Cresswell Water Pumping Station and centred at Easting: 397326, Northing: 339495, to the north west of the settlement of Cresswell.

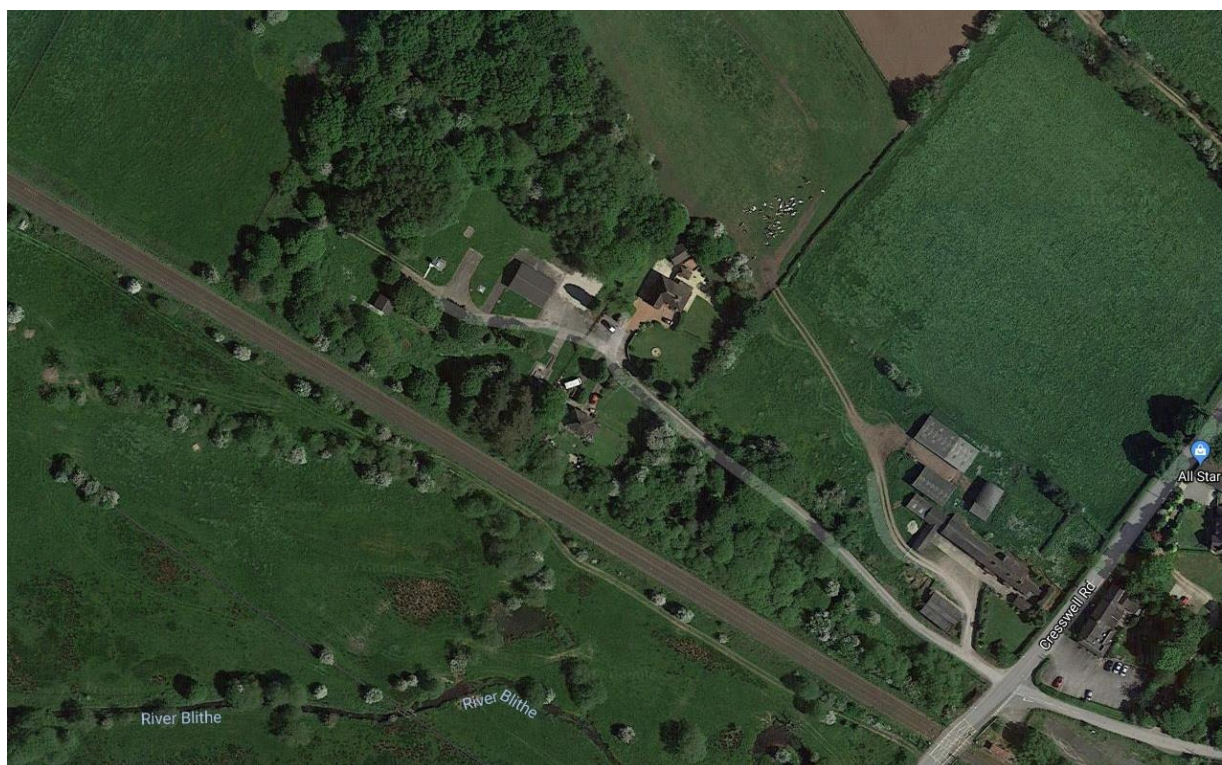
The site lies within the Green Belt and is within an SSSI Impact Risk Zone however there are no SSSIs within 5km of the site. The site lies in Flood Zone 1 as identified by the Environment Agency and is not at risk of flooding.

Access to the site will be along Cresswell Road. No amendments are proposed to the existing access. Parking and turning areas are available on site to enable vehicles to enter and exit the site safely in a forward gear.

The nearest residential properties are located approximately 83m south east and 96m east of the proposed kiosk, respectively.

There are no heritage assets affecting the site of the proposed kiosk. However the adjacent pumping station is subject to a historic environment record.

The nearest listed asset is St Marys House, located approximately 560m to the south east of the proposed kiosk location.



**Figure 1: Aerial view of site**

**(Google Maps, 2017)**

## Existing use

Cresswell Water Pumping Station is an existing operational site, which is bounded to the north by an area of woodland and to the south by a railway line. Beyond this, the site is surrounded by agricultural land.

The proposed site currently comprises tall ruderal vegetation and grassland.

## Planning History

There is no recent planning history affecting the proposed site.

## Proposed development

The proposed development comprises the installation of a new PO4 dosing kiosk, which is required as part of a wider scheme of works being undertaken to upgrade Cresswell Water Pumping Station to mitigate against Lead in pipes leaching into customer's water supplies. This kiosk requires planning permission as it exceeds the 29 cubic metres threshold as set out in Schedule 2, Part 13, Class A(e) of the Town and Country Planning (General Permitted Development)(England) Order 2015.

All other proposed works on site fall within the remit of the permitted development rights granted under Part 13, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015, to STWL as a statutory undertaker. These include new speed bumps in front of a new chemsafe and delivery area, new surface drain, three way valve and interceptor tank.

The layout of the proposed development is shown on Drawing No. A6W11720-PA00020 Rev A, alongside the works that will be undertaken as permitted development.

## Amount and Scale

It is proposed to install one kiosk which will measure approximately 5.35m(l) x 3.35m(w) x 3.05m(h) (54.6m<sup>3</sup>).

## Layout

The layout of the proposed development is shown in Drawing No. Site Location Plan – A6W11720-XA00000 Rev A.

## Appearance

The proposed kiosk will be constructed from Glass Reinforced Plastic (GRP) and coloured green. The proposed kiosk will have one set of double doors and a tanker fill door on the south eastern elevation. A vent will be installed on the south west elevation and the north east elevation.

## Access

The proposed development will use the existing site access along a private track located off Cresswell Road. There are no alterations proposed for this access. As shown on the proposed site layout, the new speed bumps within the site will allow users to navigate the site safely with parking and turning area already provided within the site.

During the construction process, vehicle movements to the site are expected to increase, although it should be noted that these movements will be associated predominantly with the permitted development works rather than the building subject to this application.

## Landscaping

To facilitate the proposed works, subject to this planning application, it will be necessary to remove some tall ruderal vegetation.

Given the proposed small scale removal of the vegetation, the positioning of the site within an established operational site and the extensive landscaping already provided to the north west of the site, no further landscaping is proposed.

## Flood Risk

The site lies in Flood Zone 1 as identified by the Environment Agency and is not at risk of flooding.

## Ecology

An Ecological Technical Note has been produced by Mott Macdonald Bentley (MMB). It concludes that the proposed development is not anticipated to impact any designated sites or ecologically significant habitats. The proposed development is also not anticipated to impact protected/notable species though some present minor ecological constraints which must be taken into consideration, including: the potential for badgers to enter the proposed development area, due to their known presence within the wider areas of the site, the potential to spread cherry laurel, which is known to spread prolifically, and the potential presence of great crested newts and reptiles. The following recommendations are put forward with respect to protected/notable species:

- To avoid impact to badgers, best practice guidance must be implemented during the works which involves: – Conducting a pre-start badger check to ensure that the disused badger sett is has not be re-occupied by badgers and that new holes have not appeared within 20m of the proposed development area. This should be undertaken by a competent and qualified ecologist.
  - Ensuring that any open excavations are covered overnight or a suitable egress is provided for potential badgers that may fall into them.
  - Ensuring that all spoil material is fully compacted when stock-piled.
- To avoid the spread of cherry laurel, it is recommended that all cuttings are left in situ on Site in the existing areas of this shrub.
- To avoid impact to potential great crested newts and reptiles, clearance of the area of tall ruderal vegetation should be undertaken with care under the supervision and instruction of a competent and qualified ecologist.

## Heritage Assets

There are no heritage assets in proximity to the site. The nearest assets are three Grade II listed assets approximately 560m south east of the site. They include: St Mary's House, the Roman Catholic Church of St Mary, and a Churchyard Cross.

## Planning Policy

Development proposals are required to comply with relevant development plan policies unless material considerations indicate otherwise. The following policies are considered pertinent to this proposal.

### National Planning Policy Framework (NPPF)

National policy is set out in the NPPF which was published in March 2012. This framework seeks to ensure sustainable forms of development and good design, alongside the protection and enhancement of the environment. The provision of appropriate infrastructure to enable a prosperous economy is a theme which runs throughout the framework, and at **Paragraph 162** the document states that "Local Planning Authorities should work with other authorities and providers to: assess the quality and capacity of infrastructure for... water supply, waste water and its treatment...".

**Paragraph 12** of the NPPF states "*proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise*".

**Paragraph 14** states that a presumption in favour of sustainable development is at the heart of the NPPF, which should be seen as a golden thread running through both plan-making and decision taking. With regards to decision taking this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework.

**Paragraph 17** of the NPPF outlines that one of the core planning principles is to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.

**Paragraph 21** states that planning policies should recognise and seek to address potential barriers to investment, including any lack of infrastructure. In drawing up Local Plans, local planning authorities should: identify priority areas for infrastructure provision.

**Paragraph 51** identifies that Local Planning Authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).

**Paragraph 79** iterates that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

**Paragraph 80** explains that Green Belt serves five purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special

character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**Paragraph 81** goes on to say that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

**Paragraph 87** states as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

**Paragraph 109** of the NPPF requires that the planning system contributes to and enhances the natural and local environment by protecting valued landscapes and minimising impact of development on biodiversity.

**Paragraph 162** states that *“Local Planning Authorities should work with other authorities and providers to: assess the quality and capacity of infrastructure for.... water supply, waste-water and its treatment...”*

## National Planning Practice Guidance (NPPG)

The NPPG provides guidance on water supply, wastewater and water quality. It states that adequate water and wastewater infrastructure is needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

## Adopted Development Plans

### Staffordshire and Stoke-on-Trent Waste Local Plan (Adopted March 2013) –

#### Policy 3.1 – General requirements for new and enhanced facilities

Within the broad locations set out in Policy 2.3, proposals for new and the expansion of existing waste management facilities should:

- i. Be fully contained within well designed purpose built or appropriately modified existing buildings or enclosed structures appropriate to the technology or process. Where this is not practicable or environmentally acceptable, the applicant must clearly demonstrate that any environmental impacts can be effectively mitigated by alternative means;
- ii. Include a programme of phased improvements, which are proportionate to the nature of the application, in order to bring the whole site up to modern standards, if the proposal relates to an existing facility which is to be extended or enhanced.
- iii. Be compatible with nearby uses, and appropriate in scale and character to their surroundings giving careful consideration to any cumulative effects that may arise (Refer to 'Policy 4: Sustainable design and protection and improvement of environmental quality')
- iv. Complement existing or planned activities or form part of an integrated waste management facility and demonstrate an overall enhancement of the site; and, v. All

proposals should be submitted together with details on the annual throughput and waste stream that the site would handle

#### Policy 4.2 Protection of environmental quality

The development of waste management facilities will be supported provided that the proposals would not give rise to materially harmful impacts, except where the material planning benefits of the proposals outweigh the material planning objections. Where proposals have an unavoidable adverse effect on these natural and cultural assets, impacts should be minimised by design and layout. Residual impacts should be mitigated or compensated for, either on or off site. In determining the impact of the proposed development, consideration will be given to the effect of the proposals on the following:

- i. People and local communities, including the potential health effects;
- ii. The highway network and other public rights of way;
- iii. Historic environment;
- iv. Natural environment features and landscape networks important for wildlife and amenity;
- v. Sites, habitats and species of importance for biodiversity or geodiversity;
- vi. The Landscape;
- vii. Cannock Chase Area of Outstanding Natural Beauty and the setting of the Peak District National Park;
- viii. The Green Belt;
- ix. The Countryside;
- x. Trees, hedgerows and woodland;
- xi. Agricultural land;
- xii. Open space (including recreational and sporting facilities)
- xiii. Protection of air, soil and water and reduction of flood risk;
- xiv. Any other interests or acknowledged importance

### **Staffordshire Moorlands District Council: Core Strategy (Adopted March 2014)**

#### Policy SS1a – Presumption in Favour of Sustainable Development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Core Strategy (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or Specific policies in that Framework indicate that development should be restricted.

#### Policy DC1 - Design Considerations

All development shall be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area in line with

the Council's Design SPD. In particular, new development should: be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area; be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, density, layout, siting, landscaping, character and appearance; create, where appropriate, attractive, functional, accessible and safe public and private environments which incorporate public spaces, green infrastructure including making provision for networks of multi-functional new and existing green space (both public and private) in accordance with policy C3, landscaping, public art, 'designing out crime' initiatives and the principles of active design; incorporate sustainable construction techniques and design concepts for buildings and their layouts to reduce the local and global impact of the development, and to adapt to climate change, in accordance with policy SD1; Staffordshire Moorlands Core Strategy - March 2014 127 Adopted Core Strategy protect the amenity of the area, including residential amenity, in terms of satisfactory daylight, sunlight, outlook, privacy and soft landscaping; promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate, in accordance with policy NE1; provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use; ensure that existing drainage, waste water and sewerage infrastructure capacity is available, and where necessary enhanced, to enable the development to proceed; ensure, where appropriate, equality of access and use for all sections of the community.

#### R1 - Rural Diversification

All development in the rural areas outside the development boundaries of the towns and villages will be assessed according to the extent to which it enhances the character, appearance and biodiversity of the countryside, promotes the sustainable diversification of the rural economy, facilitates economic activity, meets a rural community need and sustains the historic environment. Appropriate development should not harm the rural character and environmental quality of the area or any sites designated for their nature conservation, or historical interest by virtue of the scale, nature and level of activity involved and the type and amount of traffic generated or by other effects such as noise and pollution. Wherever possible development should be within suitably located buildings which are appropriate for conversion. Where new or replacement buildings are involved, development should have minimal impact on the countryside and be in close proximity to an existing settlement. Within the Green Belt, inappropriate development which is otherwise acceptable within the terms of this policy, will still need to be justified by very special circumstances. Staffordshire Moorlands Core Strategy - March 2014 139 Adopted Core Strategy Priority will be given to the re-use of rural buildings for commercial enterprise, including tourism uses, where the location is sustainable and the proposed use does not harm the building's character and/or the character of its surroundings.

## Planning Policy Summary

This application seeks consent for the installation of a PO4 dosing kiosk at Cresswell Pumping Station. The proposed installation at this site forms part of a wider scheme of works being undertaken to upgrade Cresswell Water Pumping Station to mitigate against Lead in pipes leaching into customer's water supplies.

The site is located within the Green Belt, protected by the NPPF and accompanying NPPG. Paragraph 80 of the NPPF defines the five purposes of Green Belt, namely to:

- *check the unrestricted sprawl of large built-up areas;*

- *prevent neighbouring towns merging into one another;*
- *assist in safeguarding the countryside from encroachment;*
- *preserve the setting and special character of historic towns; and*
- *assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

When considering any planning application, planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

The proposed works need to be located within the existing operational site boundary, adjacent to the existing and other proposed infrastructure. The provision of necessary water infrastructure accords with both national and local planning policy.

Cresswell is an existing operational site, situated outside the built-up area of Cresswell in a rural location, surrounded by fields in arable use. Given the existing and long-term functional nature of the site, the purpose and small-scale nature of the proposal and the extensive screening that exists on site, it is considered that the proposed works will not have an undue effect on the purposes of the Green Belt:

- the proposed development will not lead to the unrestricted sprawl of large built up areas as it is a functional and specific proposal to meet the operational requirements to upgrade the water infrastructure;
- the proposals do not directly adjoin a town / village given the nature of a water pumping station and will not cause neighbouring towns to merge together;
- as a specific proposal which needs to be located within the existing works it will not cause encroachment into the countryside; it does not adjoin a settlement and will not stimulate development pressures;
- the proposal would have no impact on preserving the setting and special character of a historic town; and
- the use could not be relocated to an urban site to encourage regeneration as it needs to be located close to the existing works.

It is considered that the aims of the Green Belt can be respected, and the works carried out without unduly affecting the openness of the Green Belt, in accordance with paragraphs 79, 80, 81 and 82 of the NPPF.

The scheme has been designed to respect and protect the rural character and quality of the surrounding environment. The proposed kiosk is to be coloured green to blend in with other infrastructure on site and to the surrounding area. The scheme will therefore have a very minimal visual impact on the surrounding landscape in accordance with Core Strategy Policy DC1.

The small-scale nature of the works, extensive existing boundary screening around the site, and the position of water pumping station in relation to the nearest residential properties also ensures that the proposed development will not adversely impact the amenity of the surrounding land users or visual quality of the landscape.

In this case it is considered that very special circumstances exist as the limited impact on the landscape is outweighed by the need to carry out the works to comply with the Water Quality

Regulation 29; to maintain water treatment to minimise contamination from pipes and reduce risk to public health.

Overall it is considered that the proposal represents a sustainable form of development and is in accordance with local and national planning policy.

## Summary

In conclusion, this planning application seeks permission for the provision of a new kiosk at Cresswell pumping station. The proposed works are necessary to enable the phosphoric acid to be dosed (Phosphate – PO<sub>4</sub>) at 84 sites across STW to mitigate against Lead in pipes leaching into customer's water supplies. Cresswell is one such site identified as high priority for maintenance or replacement based on water quality.

The proposed development will be of a relatively small-scale situated towards the centre of the site. The three units will be coloured green to minimise their visual impact amongst other development on site and will be comprehensively screened from the surrounding landscape by the existing boundary hedgerows and trees around the edge of the site.

The development will not have any adverse impacts on the aims of the Green Belt or the surrounding landscape. The proposal is part of a wider scheme of works to improve water quality in the area. It is therefore considered the proposed development comprises very special circumstances.

The proposed development is considered to be in full accordance with the relevant local and national planning policy, and will improve Severn Trent's operations in this area for the future. It is therefore respectfully requested that planning permission be granted.