ALTON SEWAGE TREATMENT WORKS

PLANNING, DESIGN AND ACCESS STATEMENT

Installation of 1 No. SAS Feed Pumps Kiosk and 1 No. Liquid Poly Dosing Kiosk

FISHER GERMAN

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01 Introduction

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 and businesses in an area stretching across the heart of the UK, from the Bristol Channel to the Humber, and from the West to the East Midlands.

STWL is currently implementing its Asset Management Plan for AMP7 (April 2020 to March 2025), which is the mechanism by which the regulator OFWAT defines in a five year capital expenditure programme for all water companies. Investment during the AMP7 period is in response to a number of key challenges including population growth and the importance of protecting the environment. Investment during this period seeks to build the resilience of water supply, reduce leakage and pollution incidents. There will also be investment in treatment works and plans to protect the environment.

Scope of Project/Background

This document has been prepared on behalf of STWL to support the planning application seeking consent for the installation of a new SAS Feed Pumps Kiosk and a Liquid Poly Dosing Kiosk.

This application should be read alongside the following plans and documents:

- A7S13578-DCL-XX-ZZ-DR-T-0001-Site Location Plan
- A7S13578-DCL-XX-ZZ-DR-T-0003- Existing Site Layout
- A7S13578-DCL-XX-ZZ-DR-T-0002 P01-03 - Proposed Site Layout
- A7S13578-DCL-XX-ZZ-DR-T-0004 P01-02- Liquid Poly Dosing Elevations
- A7S13578-DCL-XX-ZZ-DR-T-0005 P01-02- SAS Feed Pumps Elevations
- Preliminary Ecological Appraisal
- Ecological Walkover Survey
- Flood Risk Assessment

STWL/External Driver

To further improve the water quality of the River Churnet, the Alton STW shall be subject to a new phosphorus consent. In order to achieve this compliance, the construction of new assets is required within the existing Alton sewage treatment works site boundary.

The proposed works are situated within the existing operational site at Alton Sewage Treatment Works (STW). The project involves various minor works to the site, including the including the installation of a new ferric chemical dosing storage tank and a proposed concrete area (with bund) to enable the safe delivery of ferric dosing chemicals. The majority of the works proposed comprise permitted development. However, the installation of the SAS Feed Pumps Kiosk and Poly Dosing Kiosk require planning permission as both exceed the allowable threshold of 29 cubic metres under Schedule 2, Part 13, Class B(d) of the Town and Country Planning (General Permitted Development) (England) Order 2015. This planning application seeks consent for the installation of 1 No. SAS Feed Pumps Kiosk and 1 No. Liquid Poly Dosing Kiosk.

02 Site and Surrounding Area

Alton Sewage Treatment Works (STW) is an existing operational site which is located off Farley Lane, Alton at grid reference SK074426 (Easting: 407441, Northing: 342659). The site is approximately 7.6km to the east of Cheadle and 13.4km north of the centre of Uttoxeter. The site falls within the jurisdictional area of Staffordshire Moorlands District Council and Staffordshire County Council. The proposed SAS Feed Pumps Kiosk is situated on an area of existing hard standing within the STW. The Liquid Poly Dosing Kiosk lies within an area of scrubland on the edge of the STW.

The eastern, southern and western boundaries of the application site adjoin existing infrastructure within the STW. Intervening woodland lies to the north between the site and Alton Towers Theme Park, which is approximately 270 m to the north. The proposed works and the existing STW benefit from extensive screening provided by the mature trees which contain all of the site's boundaries.

The nearest residential properties are located to the west of the site off Farley Lane, approximately 240m west of the proposed works. The site is located within the Alton & Farley Conservation Area and there are a number of listed buildings in close proximity to the site. The nearest listed building is a Grade II listed wall and outbuilding enclosing the churchyard of the Catholic Church of St John the Baptist, which lies approximately 200m to the southwest of the proposed works. The Grade I Alton Towers Registered Park and Garden lies approximately 37m to the north of the proposed works. The nearest Scheduled Ancient Monument is Alton Castle, lies approximately 217m to the southwest.

The proposed works are located within flood zone 3 which means there is a high risk of flooding. A flood risk assessment has been submitted alongside the planning application and is summarised within a later stage of the planning statement.

The Churnet Way (dismantled railway) public right of way runs along the northern boundary of the STW site.

The proposed works are situated within a Site of Special Scientific interest (SSSI) Impact Risk Zone. The site is located 1km north west of Saltersford Lane Meadows SSSI, 1.3km east of the Dimmingsdale and the ranger SSSI, and 3.2km south east of Bath Pasture SSSI. The proposed works are situated 60m south of Barbary Gutter Ancient Woodland.

There are no Special Protection Areas, Special Areas of Conservation or Ramsar Sites within a 5km radius of the proposed works.

03 The Development Proposal

STWL is undertaking a variety of upgrading works at Alton STW, including a new ferric chemical dosing storage tank and a proposed concrete area (with bund) to enable the safe delivery of ferric dosing chemicals. These works comprise permitted development under Schedule 2, Part 13, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015. However, the installation of the proposed installation of a new SAS Feed Pumps Kiosk and a Liquid Poly Dosing Kiosk, which are also required as part of the development, require planning permission as they exceed the allowable threshold of 29 cubic metres under Schedule 2, Part 13, Class B(d) of the Town and Country Planning (General Permitted Development) (England) Order 2015. This planning application therefore seeks consent for the installation of the two kiosks within the operational site at Alton STW.

Amount and Scale

It is proposed to install 1 SAS feed pumps kiosk that will measure 5.5m in length, 3.5m in width and 3.05m in height. The northern elevation of the kiosk will have a set of double doors. See A7S13578-DCL-XX-ZZ-DR-T-0005 for more information.

It is proposed to install 1 no. Liquid Poly Dosing kiosk that will measure 7.98m in length, 4.01m in width and 3.4m in height. The kiosk will be sited on a reinforced concrete slab that measures 1.33m, giving a total height of 4.73 m. The western elevation of the kiosk will have a double door that is accessed by steps and a handrail from the ground floor level. The southern elevation of the kiosk will have a single door.

Layout

The layout of the proposed development is shown on plan ref: A7S13578-DCL-XX-ZZ-DR-T-0002 P01-04, which has been submitted as part of this application.

Appearance

The SAS Feed Pumps Kiosk and Liquid Poly Dosing Kiosk will be constructed from Glass Reinforced Plastic (GRP) and coloured Holly Green- BS 4800 Shade 14-C-39 as shown on plan refs: See A7S13578-DCL-XX-ZZ-DR-T-0004 and A7S13578-DCL-XX-ZZ-DR-T-0005.

Access

The site is accessed via a private track that extends from Farley Lane. No permanent alterations are proposed to the access route to the site.

Flood Risk/Drainage

The proposed development is situated within Flood Zone 3, which has a high risk of flooding. A flood risk assessment has been submitted alongside the planning application. The new infrastructure will form improvements to the existing sewage treatment works and there are no suitable alternative sites in lower flood risk zones. The East Staffordshire Flood Risk Assessment states there are no historic records of flooding at the site and it is also considered that the volume of potentially displaced floodwater in Flood Zone 3 will be negligible and not result in increased levels of risk to the neighbouring areas. The development is classified as 'less vulnerable' and an 'appropriate development' under the National Planning Policy Framework and the proposed development will meet the NPPF requirements to be safe for its lifetime, taking into account its users, without increasing flood risk elsewhere.

Ecology

Preliminary Ecological Appraisal

A Preliminary Ecological Appraisal (PEA) has been prepared by Middlemarch Environmental and submitted as part of the planning application. This report covers the entirety of the Alton STW, including the permitted development works as well as the works which form the subject of this application. Recommendations have been made with regards to best practice. The recommendations that have been provided and will be complied with as part of the proposed works are:

R3 Local Wildlife Sites: The proposed works could impact on the Churnet Valley Railway LWS, which lies adjacent to the STW's northern boundary and three other non-statutory sites within 50m of the site

R4 Habitat Retention and Protection: The development should be designed (where feasible) to allow for the retention and protection of existing notable habitats including mature trees and the River Churnet.

R5 Biodiversity Enhancement: Biodiversity enhancement measures should be incorporated into the landscaping scheme of the development to work towards net gains in biodiversity.

R8 Terrestrial Mammals including Badger, Hedgehog, Polecat and Otter: Any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape.

R10 Reptiles: A reasonable avoidance method statement should be complied with detailing how the proposed works will be undertaken in a sensitive manner to avoid any potential breach of legislation.

Updated Walkover Survey

In August 2021, an updated Ecological Walkover Survey was completed for the site. This contains similar recommendations to the previous PEA.

Heritage

The site lies within the Alton & Farley Conservation Area and the nearest listed building is a Grade II listed wall and outbuilding enclosing the churchyard of the Catholic Church of St John the Baptist, which lies approximately 200m to the southwest of the proposed works.

Given the limited scale of the proposed works, their location within an existing operational STW, and the surrounding vegetation and landscape features which buffer the site from nearby designated heritage assets, it is not considered that the proposed works will have a detrimental impact on any heritage assets.

Noise

There may be temporary short-term impacts associated within the proposed works. However, once the works are complete, there will be no noise emitted from the site.

Odour

The proposed works will not produce any odour.

04 Planning Policy

Planning policy relating to the application site is formed through:

- Local Planning Policy
- National Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan material to the proposal consists of:

- Staffordshire Moorlands Local Plan (Adopted September 2020)
- Churnet Valley Masterplan Supplementary Planning Document (Adopted March 2014)
- Staffordshire and Stoke on Trent Joint Waste Local Plan (Adopted March 2013)

In addition to the Development Plan, applications should also have regard to the National Planning Policy Framework (NPPF) and National Planning Practice Guidance, which are material considerations in any determination.

Staffordshire Moorlands Local Plan

Policy SS1 – Development Principles

The Council will expect the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands.

In particular, the Council seek to ensure that development that is undertaken in a way that protects and enhances the natural and historic environment of the District and its surrounding areas, including the Peak District National Park, both now and for future generations.

Policy SS11 – Churnet Valley Strategy

Sets out that the Churnet Valley is identified as an area for sustainable tourism and rural regeneration. The Masterplan provides a comprehensive framework for development in the Churnet Valley and development should be in accordance with the Masterplan.

The policy sets out a number of forms of development and measures that will be supported within the area. Of relevance to this application, is the following:

- measures to enhance, protect and interpret the landscape character and heritage assets of the Churnet Valley;

- actions to protect and enhance the biodiversity of the valley, including the maintenance, buffering and connection of designated sites and actions to mitigate climate change.

Policy SD4 – Pollution and Water Quality

The Council will protect people and the environment from unsafe, unhealthy and polluted environments by ensuring proposals avoid potential adverse effects; and only permitting proposals that are deemed (individually or cumulatively) to result in pollution (including air/ water/ noise/ vibration/ light/ ground contamination) if after mitigation, potential adverse effects are deemed acceptable. This may be achieved by the imposition of planning conditions or through a planning obligation.

Policy SD5 – Flood Risk

The Council will follow a sequential approach to the management of flood risk. New development will be guided to the areas with the lowest risk of current and future flooding where this is viable and compatible with other polices aimed at achieving a sustainable pattern of development. The development of sites within areas at greater risk of flooding will only be considered where they are deemed acceptable due to national or other policies or material considerations.

All applicable development must be subject to a site-specific flood risk assessment which demonstrates that the development has been designed to be flood resilient and resistant and safe for its users for the lifetime of the development; in accordance with NPPF Policy. In addition, schemes in flood risk areas should demonstrate how the sequential approach has been used to locate the most vulnerable parts of the development in the areas of lowest flood risk. Where development sites are located in flood risk areas and/or affected by the presence of watercourses, the Council expects developers to undertake early discussions with the EA and the LLFA.

Where appropriate suitable measures to deal with surface water arising from development proposals will be required to minimise the impact to and from new development.

Policy DC2 – The Historic Environment

1. The Council will conserve and where possible enhance heritage assets, including their setting in a manner appropriate to their significance. This will take into account the desirability of maintaining and enhancing their significance and will ensure that development proposals contribute positively to the character of the built and historic environment.
2. Protection will be given to designated heritage assets and their settings and non-designated heritage assets as set out in the NPPF.
3. All applications likely to affect heritage assets will require the submission of a heritage statement, including a qualitative visual assessment where appropriate.

4. Where development is likely to affect archaeology, both designated and undesignated, the Council requires the submission of a desk based assessment, and where appropriate, field surveys and trench evaluation by a qualified professional.

5. Where the loss of significance is unavoidable, recording should take place and this should be added to the Historic Environment Record as a minimum, held by Staffordshire County Council.

6. The Council will continue its proactive approach to heritage assets at risk and welcomes development proposals which would result in the sympathetic reuse of these assets in line with NPPF policy.

7. The Council will promote development which sustains, respects or enhances buildings and features which contribute to the character or heritage of an area and those interests of acknowledged importance through the use of Conservation Area Appraisals, Design Guidance and Statements, Archaeological Assessments, Characterisation Studies and Masterplanning.

Policy DC3 – Landscape and Settlement Setting

The Council will protect and, where possible, enhance local landscape and the setting of settlements in the Staffordshire Moorlands by:

1. Resisting development which would lead to prominent intrusion into the countryside or have a significant adverse impact on the character or the setting of a settlement or important views into and out of the settlement as identified in the Landscape and Settlement Character evidence;

2. Supporting development which respects and enhances local landscape character and which reinforces and enhances the setting of the settlement as identified in the Landscape and Settlement Character evidence;

3. Supporting developments which conserve or enhance the biodiversity qualities of any natural or man-made features within the landscape, such as trees, woodlands, hedgerows, walls, watercourses or ponds;

4. Supporting opportunities to positively manage the landscape and use sustainable building techniques and materials which are sympathetic to the landscape;

5. Ensuring that development does not adversely affect the wider setting of the Peak District National Park.

Policy NE1 – Biodiversity and Geological Resources

This policy sets out that the biodiversity and geological resources of the District and neighbouring areas will be conserved and enhanced by positive management and strict control of development (and having regard to relevant ecological evidence).

In addition, the Council expect all development where possible to deliver a net gain in biodiversity proportionate to the size and scale of the development. In circumstances where

adverse impacts are demonstrated to be unavoidable, developers will be required to ensure that impacts are appropriately mitigated, with suitable compensation measures towards loss of habitat used only as a last resort where there is no alternative. Where any mitigation and compensation measures are required, they should be appropriately scheduled and managed according to the nature, size and scale of the development so as to minimise impacts that may disturb protected or important habitats and species.

The policy also seeks the protection and enhancement of habitats and species of principal importance for the conservation of biodiversity as identified in legislation, and recognising and implementing appropriate measures, including landscape-scale conservation management, to take account of the fact that the distribution of habitats and species will be affected by climate change.

Policy NE2 – Trees, Woodland and Hedgerows

The Council will protect existing trees, woodlands and hedgerows, in particular, ancient woodland, veteran trees and ancient or species-rich hedgerows from loss or deterioration.

New developments may be required to provide tree cover that secures a good level of sustainability through tree retention, planting and soft landscaping, including where possible the on site replacement of any trees that are removed with sufficient tree planting to replace or increase the canopy cover on-site as appropriate.

Churnet Valley Masterplan SPD

The site lies within the Churnet Valley Masterplan area and the SPD sets out various policies to increase the economic contribution from sustainable tourism within the area and also regenerate key brownfield sites.

The Alton STW lies within the Alton Character Area. The key priorities for this area relate primarily to the expansion of the Alton Towers Resort.

Natural Environment – Development Management Principles

The protection and enhancement of the natural beauty of the Churnet Valley is the overriding requirement for any development. Land uses and the siting and scale of development should respect and enhance the valued characteristics of the Churnet Valley and the local landscape character informed by the Churnet Valley Landscape Character Assessment.

Proposals and associated infrastructure measures should not be detrimental to the sensitive ecology and geology of the area. Opportunities should be sought to ensure the management of land for nature conservation and the enjoyment of areas of wildlife and geological interest and to create links between sites of nature conservation. Where appropriate, development should create a net gain in biodiversity and encourage habitat connectivity informed by a natural landscape conservation strategy.

Under the Water Framework Directive (WFD) every opportunity should be sought to improve the River corridor and work towards the Churnet achieving 'Good Ecological Status or

Potential' by 2015 along the entire length. Under the WFD no deterioration in water quality is allowed.

Any proposals should not increase risk of flooding - where development falls within areas at risk of flooding a flood risk assessment will be required. Development should seek to reduce flood risk and improve the water environment.

Heritage – Development Management Principles

The area's designated heritage assets (listed buildings, scheduled ancient monuments and conservation areas) and its non-designated heritage assets shall be protected and maintained in a state of good repair and enhanced wherever possible.

Staffordshire and Stoke on Trent Joint Waste Local Plan (Adopted March 2013)

National Policy – Presumption in favour of Sustainable Development

When considering development proposals the Councils will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. They will always work proactively 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 plan area.

Policy 1.1 – General Principles

Planning permission for the development of new sustainable waste management facilities will be granted where the applicant can demonstrate that the proposal accords with the principles listed below:

i. Waste is minimised;

ii. Waste is used as a resource, including the formation of waste synergies, for example through the creation of resource recovery parks;

iii. The proposals represent the most sustainable option for management of waste as high up the "waste hierarchy" as feasible (Refer to Appendix 4: The Waste Hierarchy);

iv. Protection of human health and the environment.

v. Unacceptable adverse impacts, including cumulative effects, should be avoided and adverse impacts minimised and mitigated as part of the proposals; The overall (economic, social and environmental) benefits outweigh any material planning objections.

Policy 4.1 – Sustainable Design

All proposals for waste management facilities should be designed and operated to high environmental standards. They should avoid unacceptable adverse impacts and minimise adverse impacts, taking particular account of climate change implications. Where practicable they should positively contribute to the character and quality of the local natural, historic and built environment and amenity, and provide safe and convenient access for all potential users. In particular the proposal should:

i. Be compatible with adjoining land uses and the locality, taking into account national and local policies for building design, landscape character, ecology, historic environment and sport and recreation;

ii. Provide measures to minimise greenhouse gases associated with the construction, and operation of the facility, and where relevant, the decommissioning and reinstatement of the site.

iii. Provide measures to adapt to climate change;

iv. Consider design and environmental performance of the facility from the design stage and as a minimum standard should aim to achieve a BREEAM 2011 rating for industrial buildings of "very good" or higher;

v. Be supported by a site waste management plan;

vi. Provide a sustainable drainage system, unless it can be shown to be impractical to do so, to manage clean uncontaminated roof and surface run-off, with a focus on filtration techniques to improve the quality of the water environment;

vii. Consider rainwater harvesting from impermeable surfaces and encouragement of layouts which accommodate wastewater recycling, where practicable;

viii. Make a positive contribution, where appropriate, towards decentralised and renewable or low-carbon energy supply;

ix. Assess the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, minimising transport emissions and seeking when practicable and beneficial to use modes other than road transport;

x. Enhance biodiversity where possible and contribute where appropriate to green infrastructure initiatives as supported by local policies;

xi. Consider any impact upon mineral resources through potential sterilisation and address any land instability issues and/or contamination arising from former land uses; and

xii. Where restoration and aftercare is applicable, provide comprehensive, detailed, practical and achievable restoration and aftercare proposals for the site, that would achieve at the earliest opportunity, an acceptable after-use.

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.

National Planning Policy Framework (2021)

National policy is set out in the NPPF which was updated in July 2021. This framework seeks to ensure sustainable forms of development and good design, alongside the protection and enhancement of the environment.

Paragraph 8 states that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. The first of these is an economic objective, to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and co-ordinating the provision of infrastructure.

Paragraph 11 states that there should be a presumption in favour of sustainable development. Local plans should positively seek opportunities to meet the development needs of their area and development proposals which accord with and up-to-date development plan should be approved without delay. Where there are no relevant development plan policies, or the policies are out-of-date, permission should be granted unless policies in the Framework that protect areas or assets of particular importance prove a clear reason for refusing the proposed development, or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Paragraph 12 states that where a planning application conflicts with an up-to-date development plan Local Planning Authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

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

Paragraph 25 states that authorities should collaborate to identify the relevant strategic matters which they need to address in their plans and should engage with infrastructure providers.

Paragraph 26 states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary.

Paragraph 28 outlines that non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include the provision of infrastructure.

Paragraph 81 states that planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt.

Paragraph 82 states that planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.

Paragraph 124 states that planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement.

Paragraph 153 confirms that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.

Paragraph 163 states that if it is not possible for development to be located in areas with a lower risk of flooding, the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.

Note: Sewage Treatment Works are classed as 'Less Vulnerable' by Annex 3.

National Planning Practice Guidance (NPPG) - Water supply, wastewater and water quality (22 July 2019)

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.

05 Planning Policy Assessment

This application seeks consent for the installation of a new SAS Feed Pumps Kiosk and a Liquid Poly Dosing Kiosk within the existing operational Alton STW site. The proposed works are part of a phosphorus removal scheme to further improve the water quality of the River Churnet. All other proposed works on site are permitted development under Schedule 2, Part 13, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015.

The provision of infrastructure necessary to facilitate the treatment of wastewater is supported in the NPPF, and proposals to improve environmental conditions and water quality in accordance with the Water Framework Directive are supported by the Natural Environment Development Management Principles contained within the Churnet Valley Masterplan SPD.

Paragraph 122 of the NPPF seeks to support development that makes efficient use of land. The proposed kiosks are sited within the existing STW and does not require any extension to the existing operational site, thereby efficiently utilising the land available within the site. The proposed location, whilst situated in the countryside, is appropriate for the proposed works given the existence of existing assets, which require upgrading. The upgrading of the existing STW is a sustainable form of development, in line with policies SS1 and SS11 of the Staffordshire Moorlands Local Plan.

The proposed kiosks are designed to minimal scale, whilst meeting operational requirements. They proposed kiosks will be coloured Holly Green- BS 4800 Shade 14-C-39 to minimise their visual appearance and impact on the surrounding landscape. Existing vegetation surrounding the site provides sufficient screening to limit the visual appearance of the proposed works from nearby residential properties and the Churnet Way Public Right of Way. The proposed works will also not give rise to unacceptable noise or odour impacts, thereby not impacting on the amenity of nearby residents. The proposed development is considered to be in accordance with Policy SD4 of the Staffordshire Moorlands Local Plan.

Whilst the proposed works are situated within flood zone 3, as the existing STW is situated within the flood risk area there is no appropriate alternative location to install SAS Feed Pumps Kiosk and a Liquid Poly Dosing Kiosk, which relate to the onsite upgrading works. Notwithstanding this, the proposed works comprise part of a sewage treatment works, which is classified as 'less vulnerable' development and acceptable in flood zone 3a. The proposed works are therefore considered to comply with Policy SD5 of the Staffordshire Moorlands Local Plan and the Natural Environment Development Management Principles of the Churnet Valley SPD.

The proposed kiosks will be located within the existing operational STW. In accordance with Policies SS11, DC2, NE1 and NE2 of the Staffordshire Moorlands Local Plan, the Natural Environment Development Management Principles of the Churnet Valley SPD and Policy 4.1

of the Staffordshire and Stoke on Trent Joint Waste Local Plan; the works will not adversely affect biodiversity either within or outside the site, or of any designated sites in the vicinity.

The proposed works will also not have any impact upon any heritage assets due to the nature and scale of the proposed works and the intervening features between the heritage assets and the proposed kiosks. The proposed works are therefore in compliance with Policy DC2 of the Staffordshire Moorlands Local Plan and the Heritage Development Management Principles of the Churnet Valley Masterplan SPD.

The extensive existing boundary screening around the Alton STW site, and the position of the kiosks 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.

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

06 Conclusion

In conclusion, this planning application seeks permission for the installation of a SAS Feed Pumps Kiosk and a Liquid Poly Dosing Kiosk at Alton STW. The new kiosks form part of wider upgrading works on site which are required in order to allow STWL to improve the water quality of the River Churnet.

The proposed development is not considered to result in any significantly adverse impacts on ecology, flood risk, heritage or amenity.

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