

Staffordshire Moorlands District Council
Development Control
Moorlands House Stockwell Street
Leek
Staffordshire
ST13 6HQ

Our ref: SV/2023/111645/02-L01
Your ref: SMD/2023/0067
Date: 12 September 2023

Dear Sir/Madam

ERECTION OF NEW DETACHED DWELLING AND ASSOCIATED LANDSCAPING WORKS

LAND ADJ KNOTT INN, STATION LANE, RUSHTON SPENCER.

Thank you for referring the above application which was received by us on 11th August 2023.

We have reviewed the following document submitted in response to our letter dated 21st April 2023:

- Drainage Strategy report by RAB (3128) Version 1 dated 16th May 2023

The Drainage Strategy provides us with confidence that it will be possible to suitably manage the risks posed to groundwater resources by this development.

However, we require further detailed design drawings for the Surface Water/SuD's and Foul Drainage proposals, as explained further below.

We are satisfied that, in this instance, this additional detail can be secured through planning conditions and are therefore able to withdraw our objection on this basis.

Foul & Surface Drainage:

As detailed in our letter of 21st April, the proposed development site is located within a groundwater safeguard zone, with parts of the site within Source Protection Zone (SPZ) 1.

The drainage strategy report advises that there is no foul water drainage network in Station Road or the surrounding area and it is therefore not possible to connect to a mains sewer.

It is therefore proposed that the new dwelling be served by a package sewage treatment plant, with treated effluent discharged to the adjacent watercourse (ordinary unnamed) via a swale.

An attenuation basin is proposed for the collection of surface water run off which would then drain to a swale and discharge to the watercourse.

While the submitted drainage strategy has provided sufficient information to allow us to remove our previous objection to this development, further details will be required to ensure that the risk posed to the nearby public water supply abstraction can be managed adequately.

In particular, the applicant will need to provide:

- Detailed design drawings for the SUDS elements of the surface water drainage scheme. Drainage from the permeable gravel driveway should not be allowed to infiltrate into the underlying aquifer, it will therefore need to be demonstrated that these drainage structures are lined with an impermeable liner. Drainage from driveways may be subject to contamination from vehicle washing and vehicle movements for example. As the driveway is located within the SPZ 1 for the public water supply it is essential that safeguards are in place to properly manage this risk.
- Detailed design drawings for the foul drainage scheme, including construction details/cross section of the proposed swale to demonstrate that the swale will be lined with an impermeable liner to prevent infiltration to ground and groundwater.
- The proposed foul drainage scheme will be subject to the General Binding Rules (GBR's) [General binding rules for small sewage discharges \(SSDs\) with effect from 2 October 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/general-binding-rules-for-small-sewage-discharges-with-effect-from-2-october-2023). The applicant will need to demonstrate compliance with the GBR's, with particular consideration of rule No.23 which comes in to effect for new discharges commencing after 2nd October 2023. It will need to be demonstrated that the discharge point to the surface watercourse is at least 50m away from the permitted discharge at the Knot Inn (NGR SJ 93629 62496).

In line with the requirements of the NPPF (para. 174e) that new development should not present an unacceptable risk to groundwater, should you be minded to approve the application we require the following conditions to form part of the consent.

Foul Drainage

Condition: Prior to any discharge to the Package Sewage Treatment Plant, Swale, and watercourse outfall, a detailed scheme for the disposal of foul effluent, in accordance with drawing no. RAB3128FRD/001, 002 & 003 and the Drainage Strategy report by RAB (3128) Version 1 dated 16th May 2023 shall be submitted to and agreed in writing by the Local Planning Authority and implemented in accordance with the approved details.

Details submitted shall include detailed design drawings for the foul drainage scheme including;

- highest specification pipework
- construction details/cross section of the proposed swale to demonstrate that the swale will be lined with an impermeable liner to prevent infiltration to ground and groundwater.
- maintenance and management regime

Reason(s)

To ensure that the proposed non-main drainage does not harm groundwater resources in line with paragraph 174 of the National Planning Policy Framework and Position Statements G1, G8, G12 & G13 of the 'The Environment Agency's approach to groundwater protection'. [Groundwater protection position statements - GOV.UK \(www.gov.uk\)](https://www.gov.uk/groundwater-protection-position-statements)

Surface Water Drainage

Condition: No development approved by this permission shall be commenced until a detailed scheme for the provision and implementation of a surface water regulation system, in accordance with drawing no. RAB3128FRD/001, 002 & 003 and the Drainage Strategy report by RAB (3128) Version 1 dated 16th May 2023 has been submitted to and approved in writing by the Local Planning authority. The scheme shall include detailed design drawings including:

- proposed pipework specification
- geotechnical membrane (liner) specification and construction details/ cross section of the attenuation basins/ bioretention areas and swales
- all other pollution prevention measures.
- maintenance and management regime.

The scheme shall be implemented in accordance with the approved details, unless otherwise agreed in writing by the LPA.

Reason: To ensure that the proposed surface water drainage does not harm groundwater resources in line with paragraph 174 of the National Planning Policy Framework and Position Statements G1, G8, G12 & G13 of the 'The Environment Agency's approach to groundwater protection'.

Condition: Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking areas and hardstandings shall be passed through an oil interceptor designed and constructed to have a capacity and details compatible with the site being drained. Roof water shall not pass through the interceptor.

Reason: To prevent pollution of the water environment.

Storage of Oils

Condition: Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound shall be at least equivalent to the capacity of the tank plus 10%. If there is multiple tankage, the compound shall be at least equivalent to the capacity of the largest tank, vessel or the combined capacity of interconnected tanks or vessels plus 10%. All filling points, associated pipework, vents, gauges and sight glasses must be located within the bund or have separate secondary containment. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework shall be located above ground and protected from accidental damage. All filling points and tank/vessels overflow pipe outlets shall be detailed to discharge downwards into the bund.

Reason: To prevent pollution of the water environment.

Note to Planning Authority:

It is noted that there is some ambiguity in the submitted site plans available on the

planning portal.

- Proposed Site Plan Part 1, Drawing No. 002 rev D 04/07/2023
- Proposed Site Plan Part 2, Drawing No. 003 rev D 04/07/2023

Both show foul and surface water drainage discharging to soakaway. These are the plans that we objected to and would not support.

The above comments are based on the plans that are available within the submitted drainage strategy showing discharge of drainage to surface water course via various SUDS features.

- Drainage Design Plan View, Drawing no. RAB3128FRD/001, Revision v1, 02/05/2022
- Drainage Design Plan View, Drawing no. RAB3128FRD/002, Revision v1, 02/05/2022
- Drainage Design Plan View, Drawing no. RAB3128FRD/003, Revision v1, 02/05/2022

We would expect the development to be carried out in accordance with these plans, subject to detailed design as required by the above conditions.

Yours faithfully

Emma Millband
Planning Officer

Direct e-mail

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