
From: Curley, Jane
Sent: 25 October 2023 10:42
To: Planning Comments (SMDC)
Subject: FW: Late Representation re SMD/2022/0014

Categories:

Jane Curley (Mrs)
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From: Vivienne Cowie **Sent:** Wednesday, October 25, 2023 10:03 AM
To: Curley, Jane **Subject:** Fwd: Late Representation re SMD/2022/0014

Dear Mrs Curley

I object to the application SMD/2022/0014

This comparatively minor application consists of over 200 pages of documentation which strays into support for 0646. The outfall structure is of little note on this vast site, but the flow of water from the outfall is relevant to the Whiston Eaves SSSI. Abbydale BEC state that, 'only hand excavation and a single mini digger shall be used when excavating within the SSSI area.' And Asteer Planning state, 'within the SSSI, the excavation is estimated to be approximately 7.9 metres wide tapering down to 1.4 metres where it joins the existing channel. At its widest the excavation is 17.5 metres wide.' But the Staffordshire Moorlands Local Plan states, 'The Council will not normally permit any development proposal which would directly or indirectly have an adverse effect on SSSI.' The use of a mini digger and excavations up to 17.5 metres in width don't comply with the Local Plan.

Abbydale refer to use of spill kits, plant nappies and pollution prevention measures - an acknowledgement of pollution risk. Avis Young advises on Mitigation Measures. 'Prior to works commencing all plant, equipment and PPE should be disinfected to prevent the spread of pathogens into the tributary stream of the SSSI.' Bowland Ecology also refer to pollution prevention control and state in their impact assessment that impacts will occur during both construction and operation. Please note during operation.

So stream A which flows through the SSSI may well be polluted by pathogens or disinfectant and where does stream A flow to? The River Churnet that flows at the foot of the hillside. Will the River Churnet salmon prefer the pathogens or the disinfectant - both toxic. We should protect the salmon and all the wildlife of the river which is enjoying an ecological upsurge. And what about family pets belonging to permanent residents and on public footpaths? And please note Bowland Ecology advises that impacts will occur during operation as well as construction. These are not just problems arising from the outfall construction, these are problems associated with the construction of the entire site because the hillside which slopes to the river is a permeable landscape. The application form to SMDC Planning asks about proposals for foul sewerage. The answer provided is 'unknown'. The next question, 'are you proposing to connect to the existing drainage system?' The answer given is 'no'. Where will the sewerage go? Severn Trent express, 'no concern for impact on public sewerage'. Well we know what the water companies do with sewerage don't we? I believe the River Churnet salmon and other wildlife should be worried. As mitigation Bowland Ecology state, 'as a precaution an ecologist will check the area prior to works commencing and will remove any amphibians to suitable habitat.' I ask you, picture the back to nature condition of the site. Is this a measure of the reassurances we have in these applications?

Abbeydale states, 'Any changes to current conditions shall be agreed in writing prior to the start of the works.' Who will approve these changes? Will they go back to SMDC Planning and the PAC? The admission of the prospects of more changes after four years of negotiations and thousands of written words, which must have driven the Case Officer to distraction demonstrate the uncertainty of this whole business. It cannot be safe and should be rejected.

Natural England express concern re surface water through the SSSI. JBA Consulting refers to springs, seepages and sinks. Will the presence of many sinks threaten the stability of the hillside? A hillside already bearing the stresses and strains of a 30 metre deep pool and a 20 metre pool. The threat to life for children, vulnerable people and day visitors during operation is terrifying. 30 metres is 98 feet. A person in difficulty has little chance of rescue. And please note the large number of proposed permanent residents may well be elderly. Back to the threat of the sinks, this geomorphology does not inspire confidence in the foundations of lodges situated on a sloping site. The prospect of bank collapse for these enormous volumes of water is a serious threat to the safety of site residents.

Asteer Planning predicts the development will result in a safe and accessible environment and that the application proposals would have an acceptable impact on the local highway network. Really - that's an area I would carefully avoid if I was an advocate of the project.

An Abbeydale report from March 2011. 'With the flooding of the quarry our observations would suggest the over steep quarry side faces will decay and cause localised instability into the lake. Although this scenario may be acceptable in a quarry setting where public access is limited, in an area developed for lake

activities and lodges on the quarry sides, localised slipping could not only affect the areas of movement but displaced water in the lake might be expected to surge in a wave across the lake and endanger lakeside activities.' My view additionally is that such an event may overtop the bank and surge down the hillside and threaten lodges. This flood threat is also referred to by Abbeydale in their Outfall Method Statement for application 0014. How can this be satisfactorily risk assessed, it can't. It is a disaster in the making. The decision makers of the PAC should focus with great care on safety, they may be held responsible in the event of a tragedy. Can safety be 100% guaranteed? No it can't. There is uncertainty and this application along with the others this afternoon should be rejected.

Thank you.

Regards

Vivienne Cowie

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