

Staffordshire Moorlands District Council

By email

Your ref: SMD/2023/00
67

Our ref: DC/23/598 V2

Date: 15-SEP-23

Dear Planning Team

Location: Land Adj Knott Inn, Station Lane, Rushton Spencer, Staffordshire,
Proposal: Erection of new detached dwelling and associated landscaping works

Further to our response dated 7th March 2023 and following the submission of a Ground Investigation Report and Drainage Strategy, United Utilities wish to make the following comments regarding the proposal detailed above.

GROUNDWATER PROTECTION ZONE

Risk to public water supply

ADVISORY - The site overlies the sandstone rock, in a Groundwater Source Protection Zone (SPZ)
1. This forms an aquifer, abstracted at depth by United Utilities for local public drinking water supply at the nearby Rushton Spencer borehole, located 27m to the north. The raw water is pumped to Hug Bridge for treatment.

Development in SPZ1

United Utilities considers this development footprint, taking place within SPZ1, as the most sensitive location from a groundwater protection viewpoint. Notwithstanding our strong preference for development to not take place in locations within SPZ1, if the proposed development in this location is accepted through the planning process, we draw your attention to the advice of the Environment Agency on development in such locations 'The Environment Agency's approach to groundwater protection'. The document is available at: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Request for Additional Information

The submitted Ground Investigation Report and Drainage Strategy do not consider the risks posed by the foul drainage to potable groundwater sources. We expect to see a risk assessment which considers the presence of a vertical pathway for sewage and treated effluent through the superficial deposits into the underlying sandstone aquifer, and the potential connection between the surface watercourse intended for foul discharge, and the abstraction borehole at Rushton Spencer.

United Utilities will require the use of the highest specification pipework and designs for schemes involving new sewerage systems in SPZ1, to minimise leakage. As the ground investigation available suggests an absence of a suitable thickness of impermeable deposits forming a confining layer to the underlying aquifer, additional protection is required to minimise the risk wastewater pipework poses to the quality of the groundwater. The site lies within SPZ1 and across SPZ2, and therefore a completely sealed sewer network is required to minimise leaks from polluting the aquifer. The sealed network may be achieved by installation of a clay liner to the foul network and sealing of manhole chambers, or another impermeable material, such as Geosynthetic Clay Liners (GCLs), may be selected for lining

We request that this information is submitted for our review and comment, prior to the determination of this application. On receipt of this information, we will be able to provide further comment.

Private Wastewater Treatment Plants

United Utilities' strong preference would be for a new private Wastewater treatment plant to be sited as far from the Borehole as possible. If the proposal were to be located within Source Protection Zone 1, pipework and site design will be required to adhere to a higher specification to ensure that leakage from sewerage systems is avoided. This can include secondary containment, such as clay lining sewer trenches.

There is a potential risk of wastewater pollution affecting the UU drinking water abstraction, from any current septic tank or future wastewater treatment plant, installed in strata overlying the Groundwater Protection Zone 1 (GPZ1).

Similar to other recent local developments in the Rushton Spencer catchment, United Utilities would be minded to request that the Local Planning Authority (LPA) place a condition on any proposed private Wastewater drainage scheme on-site:

Condition: Wastewater Drainage

Prior to the commencement of development, a Wastewater Drainage design for the site must be submitted to, and approved in writing by, the Local Planning Authority.

The scheme shall be implemented in full in accordance with the approved details prior to first occupation of the first new dwelling, or completion of the development, whichever is the sooner.

Before the dwelling is occupied, a validation report that demonstrates the drainage scheme and associated groundwater mitigation measures have been completed in accordance with the approved details and the Environmental permit shall be submitted to and approved in writing by the Local Planning Authority.

The approved drainage system shall be retained, managed and maintained in accordance with the approved details at all times for the duration of the development.

Reason: To manage the risk of pollution to the underlying aquifer, abstracted for drinking water supply and to promote sustainable development.

The Environment Agency (EA) currently require a pollution Risk Assessment of any private sewage treatment, proposed for a location within a SPZ1. The Applicant should follow EA guidance and apply for a permit for the changes to discharges, or for the existing septic tank located on-site within a SPZ1.

The consent of the EA is also required for the discharge of treated effluent from the proposed wastewater treatment plant. *It would be UU's preference that any treated effluent outfall is located as far from the borehole, as possible on-site.*

The private wastewater treatment plant must be designed to ensure that the discharges do not pose an unacceptable risk of pollution to groundwater, in order to protect United Utilities' drinking water abstraction sources in the vicinity of the site.

A Ground Investigation Report has been submitted but the following information is still outstanding:

- *Ground Investigation information should address whether there is a potential vertical pathway for sewage and treated effluent, through the superficial deposits into the sandstone aquifer.*
- *Any additional Wastewater flows from the Development must be considered, in terms of the design specifications of a proposed, or pre-existing system (i.e. the larger PS & WWT plant, sited at the adjacent Knot Inn - SMD/2016/0546) and the potential to increase bacteriological contamination and nitrate run-off towards the Brook, or into the sandstone.*

Construction Environment Management Plan (CEMP)

The applicant should follow best practise on their use and storage of fuels, oils and chemicals, to remove the risk of causing pollution during construction. In light of the proximity of construction to the borehole, United Utilities would recommend the LPA place the following condition upon development:

Condition: Construction Environment Management Plan (CEMP)

No development shall take place, including any works of demolition, until a Construction Environment Management Plan, including Pollution Risk Assessments and Method Statements, has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:

- i) Protection of surface and groundwater resources;*
- ii) Best practise on the use and storage of fuels, oils and chemicals, to remove the risk of causing pollution during construction;*
- iii) the parking of vehicles of site operatives and visitors;*
- iv) loading and unloading of plant and materials;*
- v) storage of plant and materials used in constructing the development;*
- vi) wheel washing facilities;*
- vii) a scheme for recycling/disposing of waste resulting from demolition and construction works;*

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

Reason: To prevent pollution of groundwater and ensure there is no contamination to public water supply during construction.

Sustainable drainage systems (SuDS)

The planning application indicates use of SuDS for surfacewater drainage and the proposed plans indicate parking spaces, with permeable pavement for the access roadway.

Together with the Environment Agency, United Utilities supports the principles of sustainable drainage systems (SuDS) for new discharges. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater.

Discharge of clean roof water to ground

The discharge of clean roof water to ground is acceptable within SPZ1 & 2, provided that all roof water down-pipes are sealed against pollutants entering the system from surface run-off, effluent disposal or other forms of discharge. The method of discharge must not create new pathways for pollutants to groundwater or mobilise contaminants already in the ground.

DRAINAGE

We strongly encourage all developments to include sustainable drainage systems to help manage surface water and to offer new opportunities for wildlife to flourish. We request that Local Planning Authorities and applicants do all they can to avoid surface water entering the public sewer. The flows that come from this surface water are very large when compared with the foul water that comes from toilets, showers, baths, washing machines, etc. It is the surface water that uses up a lot of capacity in our sewers and results in the unnecessary pumping and treatment of surface water at our pumping stations and treatment works. If new developments can manage flows through sustainable drainage systems that discharge to an alternative to the public sewer, it will help to minimise the likelihood of sewers spilling into watercourses and the flooding of homes and businesses.

National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) advise that surface water from new developments should be investigated and delivered in the following order of priority:

1. into the ground (infiltration);

2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.

The applicant should consider their drainage plans in accordance with the drainage hierarchy outlined above.

Please note, United Utilities is not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river).

In the event that the applicant, or any subsequent developer, approaches United Utilities regarding a connection for surface water to the public sewer, it is likely that we will request evidence that the drainage hierarchy has been fully investigated and why more sustainable options are not achievable. This will be managed through either our 'S106 Sewer Connections' or 'S104 Adoptions' processes.

If the applicant intends to offer wastewater assets forward for adoption by United Utilities, their proposed detailed design will be subject to a technical appraisal by our Developer Services team and must meet the requirements outlined in 'Sewerage Sector Guidance Appendix C – Design and Construction Guidance v2-2' dated 29 June 2022 or any subsequent iteration. This is important as drainage design can be a key determining factor of site levels and layout.

The applicant should not presume that the principles outlined within a drainage strategy will meet the detailed requirements for a successful adoption application. We strongly recommend that no construction commences until the detailed drainage design, has been assessed and accepted in writing by United Utilities. Any works carried out prior to the technical assessment being approved is done entirely at the developers own risk and could be subject to change.

UNITED UTILITIES PROPERTY, ASSETS AND INFRASTRUCTURE

Where United Utilities' assets cross the proposed red line boundary, developers must contact our Developer Services team prior to commencing any works on site, including trial holes, groundworks or demolition. Please see 'Contacts' section below.

Water pipelines

United Utilities will not allow building over or in close proximity to a water main.

Wastewater pipelines

United Utilities will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances. *Nb. Proposals to extend domestic properties either above, or in close proximity to a public sewer will be reviewed on a case by case basis by either by a building control professional or following a direct application to United Utilities (see our website for further details).*

Important information regarding water and wastewater pipelines and apparatus

It is the applicant's responsibility to investigate and demonstrate the exact relationship between United Utilities' assets and the proposed development.

A number of providers offer a paid for mapping service, including United Utilities (see '*Contacts*' section below). The position of the underground apparatus shown on water and wastewater asset maps is approximate only and is given in accordance with the best information currently available. Therefore, we strongly recommend the applicant, or any future developer, does not rely solely on the asset maps to inform decisions relating to the detail of their site and instead investigates the precise location of any underground pipelines and apparatus. Where additional information is requested to enable an assessment of the proximity of proposed development features to United Utilities assets, the proven location of pipelines should be confirmed by site survey; an extract of asset maps will not suffice. The applicant should seek advice from our Developer Services team on this matter. See '*Contacts*' Section below. United Utilities Water will not accept liability for any loss or damage caused by the actual position of our assets and infrastructure being different from those shown on asset maps.

Developer's should investigate the existence and the precise location of water and wastewater pipelines as soon as possible as this could significantly impact the preferred site layout and/or diversion of the asset(s) may be required. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion of assets to accommodate development, will be at the applicant/developer's expense. In some circumstances, usually related to the size and nature of the assets impacted by proposals, developers may discover the cost of diversion is prohibitive in the context of their development scheme.

Any agreement to divert our underground assets will be subject to a diversion application, made directly to United Utilities. This is a separate matter to the determination of a planning application. We will not guarantee, or infer acceptance of, a proposed diversion through the planning process (where diversion is indicated on submitted plans). In the event that an application to divert or abandon underground assets is submitted to United Utilities and subsequently rejected (either before or after the determination of a planning application), applicants should be aware that they may need to amend their proposed layout to accommodate United Utilities' assets.

Where United Utilities' assets exist, the level of cover to United Utilities pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on pipelines without prior agreement from United Utilities. This would include sustainable drainage features, earth movement and the transport and position of construction equipment and vehicles.

Any construction activities in the vicinity of United Utilities' assets, including any assets or infrastructure that may be located outside the applicant's red line boundary, must comply with national building and construction standards and where applicable, our '*Standard Conditions for Works Adjacent to Pipelines*', a copy of which is available on our website. The applicant, and/or any subsequent developer should note that our '*Standard Conditions*' guidance applies to any

design and construction activities in close proximity to water pipelines and apparatus that are no longer in service, as well as pipelines and apparatus that are currently operational. It is the applicant's responsibility to ensure that United Utilities' required access is provided within any proposed layout and that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to United Utilities' assets resulting from their activity.

WATER AND WASTEWATER SERVICES

If the applicant intends to receive water and/or wastewater services from United Utilities they should visit our website or contact the Developer Services team for advice at the earliest opportunity. This includes seeking confirmation of the required metering arrangements for the proposed development. See '*Contacts*' Section below.

If the proposed development site benefits from existing water and wastewater connections, the applicant should not assume that the connection(s) will be suitable for the new proposal or that any existing metering arrangements will suffice. In addition, if reinforcement of the water network is required to meet potential demand, this could be a significant project and the design and construction period should be accounted for.

In some circumstances we may require a compulsory meter is fitted. For detailed guidance on whether the development will require a compulsory meter please visit <https://www.unitedutilities.com/my-account/your-bill/our-household-charges-20212022/> and go to section 7.7 for compulsory metering.

To promote sustainable development United Utilities offers a reduction in infrastructure charges for applicant's delivering water efficient homes and draining surface water sustainably (criteria applies). For further information, we strongly recommend the applicant visits our website when considering any water or wastewater design <https://www.unitedutilities.com/builders-developers/your-development/planning/building-sustainable-homes/>

Business customers can find additional information on our sustainable drainage incentive scheme at <https://www.unitedutilities.com/Business-services/retailers/incentive-schemes/>

To avoid any unnecessary costs and delays being incurred by the applicant or any subsequent developer, we strongly recommend the applicant seeks advice regarding water and wastewater services, and metering arrangements, at the earliest opportunity. Please see '*Contacts*' Section below.

CONTACTS

Website

For detailed guidance on water and wastewater services, including application forms and the opportunity to talk to the Developer Services team using the '**Live Chat**' function, please visit: <http://www.unitedutilities.com/builders-developers.aspx>

Email

For advice on water and wastewater services or to discuss proposals near to pipelines, email the Developer Services team as follows:

Water mains and water supply, including metering -

Public sewers and drainage -

Telephone - 0345 072 6067

Property Searches (for asset maps):

A number of providers offer a paid for mapping service including United Utilities. For more information, or to purchase a sewer and water plan from United Utilities, please visit <https://www.unitedutilities.com/property-searches/>

Water and sewer records can be viewed for free at our Warrington Head Office by calling 0370 751 0101. Appointments must be made in advance. Public sewer records can be viewed at local authority offices. Arrangements should be made directly with the local authority.

We request that a copy of this letter is made available to the applicant.

Yours faithfully

The Planning, Landscape and Ecology Team