

Planning, Design & Access Statement

Installation of a Filtration Building (Retrospective) at
Cresswell Borehole Pumping Station

Prepared by Fisher German LLP on behalf of Severn Trent
Water Limited

Project Title

Cresswell BHPS
FP 124348

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1. Introduction

- 1.1 This Planning, Design and Access Statement has been prepared by Fisher German LLP on behalf of Severn Trent Water Limited (STWL) in relation to a development at Cresswell Borehole Pumping Station (BPS), Cresswell Lane, Cresswell, Stoke on Trent, ST11 9RE.
- 1.2 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.
- 1.3 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.
- 1.4 The development comprises the installation of a filtration building, which is required permanently following advice from the Public Health & Standards team within Severn Trent who decided that the site cannot run without disinfection of the water, due to water quality issues at the site. Full retrospective planning permission is sought for the filtration building.
- 1.5 This application should be read alongside the following plans and documents:
- A6W 12169 PA00100 – Location Plan
 - A6W 12169 PA00102 – Existing Site Layout
 - A6W 12169 PA00103 – Proposed Site Layout
 - A6W 12169 PT00101 – Filtration Building Elevations
- 1.6 The filtration building is located within the boundary of the Borehole Pumping Station and is a functional requirement to support the continued operations at Cresswell BPS, to provide clean water. It is considered that the development accords with the relevant planning policies and technical standards.

2. Site and Surrounding Area

- 2.1 Cresswell BPS is located off Cresswell Lane, Cresswell, Stoke on Trent, ST11 9RE at OS Reference: SJ 97322 39509 (Easting: 397322, Northing: 339509). The site falls within the jurisdictional area of Staffordshire Moorlands District Council.
- 2.2 The BPS is situated within Cresswell which is a hamlet in Staffordshire, approximately 10km south east of Stoke-on-Trent. The site is bounded by agricultural fields to the north-east and north-west, a railway line runs along the south western boundary of the site and there are 2 residential properties which abut the south-east boundary of the site. There is existing screening provided by the trees and hedgerows along the boundaries of the site. A Site Location Plan is submitted with the application, Drawing No. A6W 12169 PA00100.
- 2.3 The filtration building is situated in the east of the existing operational STW, the perimeter of which is bound by existing boundary fencing. The site is accessed via an existing gated access point on the south-east side of the site which leads to Cresswell Lane via a 200m long track. The wider site includes woodland, hardstanding, buildings and STW operational infrastructure.
- 2.4 The application site is not subject to any site-specific environmental designations and there are no Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA), Special Areas of Conservation (SAC) or Ramsar Sites within a 5km radius of the site.
- 2.5 The site is located within the Green Belt.
- 2.6 The site is located within Flood Zone 1, which means there is a low risk of flooding in this area.
- 2.7 The nearest residential property is located approximately 30m to the east of the site.
- 2.8 The closest heritage asset is Grade II listed St Marys House, which is situated 500m to the south east of the site.
- 2.9 There is a public right of way along the access track to the site.

Planning History

- 2.10 Planning permission was granted on 04/07/2021 at the site for *"The installation of 1 No. Motor Control Centre (MCC) Kiosk"*, reference SMD/2021/0109. Condition 7 on this permission stated that *"The building marked "Temporary Filtration Building" on drawing 103A shall be demolished and all demolition materials shall be removed from the site before 1st January 2024."*. However, this permission has not been implemented due to a change in scope at the site. Additionally, the filtration building, marked as temporary in the previous application, is now required permanently and is therefore subject to this retrospective planning application.

3. The Development Proposal

- 3.1 This application seeks full retrospective planning permission for the filtration building at Cresswell BPS, which is required permanently following advice from the Public Health & Standards team within Severn Trent who decided that the site cannot run without disinfection of the water, due to water quality issues at the site.
- 3.2 The building became operational on 30 August 2020.
- 3.3 The building requires planning permission because its capacity exceeds the relevant threshold for permitted development (29 cubic meters) set out in Schedule 2, Part 13, Class A(e) of the Town and Country Planning (General Permitted Development) (England) Order 2015.
- 3.4 The filtration building measures 21.57m in length by 6.01m in width by 5.04m in height. The building has a footprint of approximately 129.6m². The lower part of the building is constructed from concrete cladding and the upper part of the building, including the roof is constructed of Juniper Green (BS 4800 12-b-29) steel cladding. There is a double personnel access door and a single access door on the south-west elevation to provide access. Drawing No. A6W 12169 PT00101 provides further details of the building.
- 3.5 Drawing No. A6W 12169 PA00103 shows the location of the building in the context of the site.
- 3.6 The surface water from the roof is connected to the existing site drainage via gutters and drain pipes.



Figure 1 - Filtration Building (South-West Elevation)



Figure 2 - Filtration Building (South-East Elevation)



Figure 3 - Filtration Building (South-East Elevation)

4. Planning Policy

- 4.1 Planning policy relating to the application site is formed through:
- Local Planning Policy
 - National Planning Policy
- 4.2 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)
- 4.3 In addition to the Development Plan, applications should also have regard to the National Planning Policy Framework (NPPF), National Planning Practice Guidance, which are material considerations in any determination.

Staffordshire Moorlands Local Plan (Adopted September 2020)

Policy SS1: Development Principles

- 4.4 This policy states the Council will expect the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands.

Policy SS 10: Other Rural Areas Strategy

- 4.5 This policy states that the other rural areas comprise the countryside and the green belt outside of the development boundaries of the towns and larger villages and the open countryside surrounding the smaller villages. These areas will provide only for development which has an essential need to be located in the countryside, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside. The Council and its partners will achieve this through the following actions:
- Maintain the Green Belt within Staffordshire Moorlands. Strict control will continue to be exercised over inappropriate development within the Green Belt allowing only for exceptions as defined by Government policy.

Policy SD1 Sustainable Use of Resources

- 4.6 This policy states that the Council will require all development to make sustainable use of resources, and adapt to climate change.

Policy SD 4 Pollution and Water Quality

- 4.7 This policy states that 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.
- 4.8 Planning permission shall only be granted where the proposal makes provision for the protection (and where feasible, enhancement) of water quality and waterside habitat, and water resources where applicable.
- 4.9 In the case of development within Groundwater Source Protection Zones (SPZs) applicants should demonstrate how site layout has sought to mitigate potential pollution to public water

supply. A quantitative and qualitative risk assessment and groundwater protection mitigation strategy may be required subject to consultation with relevant bodies.

Policy DC 1 Design Considerations

- 4.10 This policy states that 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 Guide SPD.

Policy DC2 The Historic Environment

- 4.11 This policy states that 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.

Policy DC 3 Landscape and Settlement Setting

- 4.12 This policy states that the Council will protect and, where possible, enhance local landscape and the setting of settlements in the Staffordshire Moorlands.

Policy NE 1 Biodiversity and Geological Resources

- 4.13 This policy states 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.

National Planning Policy Framework (2023)

- 4.14 National policy is set out in the NPPF which was updated in December 2023. This framework seeks to ensure sustainable forms of development and good design, alongside the protection and enhancement of the environment.
- 4.15 [Paragraph 8](#) states 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.
- 4.16 [Paragraph 11](#) states 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 an 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.
- 4.17 [Paragraph 12](#) states 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 where material considerations in a particular case indicate that the plan should not be followed.
- 4.18 [Paragraph 20](#) states 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.
- 4.19 [Paragraph 25](#) states authorities should collaborate to identify the relevant strategic matters which they need to address in their plans and should engage with infrastructure providers.
- 4.20 [Paragraph 26](#) states 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.
- 4.21 [Paragraph 28](#) outlines 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.
- 4.22 [Paragraph 85](#) states planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt.
- 4.23 [Paragraph 86](#) states planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.
- 4.24 [Paragraph 115](#) states that Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.25 [Paragraph 128](#) states 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.
- 4.26 [Paragraph 142](#) states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.
- 4.27 [Paragraph 143](#) states that the 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
- 4.28 [Paragraph 152](#) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 4.29 [Paragraph 155](#) states that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes:
- b) Engineering operations;

- 4.30 [Paragraph 158](#) confirms 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.

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

- 4.31 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.

5. Planning Policy Assessment

Principle of Development

- 5.1 This planning application seeks retrospective planning permission for the filtration building at Cresswell BPS, which is required permanently following advice from the Public Health & Standards team within Severn Trent who decided that the site cannot run without disinfection of the water, due to water quality issues at the site.
- 5.2 The building has been designed to be the minimum scale required to serve its purpose as part of the operation of the site in line with Policy SD4 from the Staffordshire Moorlands Local Plan.
- 5.3 The provision of infrastructure is supported in both local and national planning policy. The NPPF also highlights that local authorities should work with infrastructure providers to identify requirement, and co-ordinate the provision of infrastructure in their localities (NPPF paras 8, 20, 25, 26, 28), and the building will help to ensure that both the current and future water infrastructure needs of the district and beyond can be met.

Amenity

- 5.4 The building is sited within the boundary of the existing operational BPS and is seen within the context of existing assets, thereby limiting the impact on the surrounding area. The BPS site is positioned in a rural location with trees and hedgerows along the boundaries providing substantial screening. The nearest residential properties are situated approximately 30m to the east of the site and are well screened by existing vegetation. The expected impact on amenity is considered to be minimal given that the building is located within an existing operational site, the relatively small scale of the building in relation to the surrounding development on the wider site, the distance between the building and the nearest properties and the intervening features. Noise impact from the building on the surrounding area are minimal and it does not produce any odour.

Green Belt

- 5.5 The site is designated as Green Belt. Paragraphs 147 to 149 of the NPPF refer to proposals affecting the Green Belt, defining inappropriate development as '*any development which is harmful to the Green Belt*', and setting out the exceptions to this in Paragraph 149. Paragraph 150 of the NPPF states that certain other forms of development are also not inappropriate in the Green Belt, provided they preserve its openness and do not conflict with the purposes of including land within it, and this includes engineering operations.
- 5.6 Water infrastructure can be considered as essential engineering operations, and the filtration building would not therefore be inappropriate development within the Green Belt provided that openness is preserved and the operation does not conflict with the purposes of including land within it.
- 5.7 Paragraph 137 and 138 of the NPPF refers to the openness of Green Belt and the five key purposes of designating land as Green Belt. Cresswell is an established borehole pumping station which means that the filtration building will continue to be viewed within the context of other existing established infrastructure assets. It is considered that the impact on openness will be limited as the immediate surrounding area is already developed. In addition, due to the existing mature hedgerows and woodland around the site, there are relatively few opportunities to view the site from the wider surrounding area. Any views of the development are significantly mitigated by the

existing landscaping. The works must be positioned in this location, adjacent to the existing water infrastructure, and could not reasonably be located elsewhere (Policy SS10).

- 5.8 Furthermore, the development does not compromise the main purposes for including land in Green Belt as outlined below with reference to paragraph 138 of the NPPF 2023:

To check the unrestricted sprawl of large built up areas;

- 5.9 The 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 of STWL as a statutory undertaker. It has been carefully designed and is the minimum required to fulfil operational purposes.

The proposed works will not cause neighbouring towns to merge into one another;

- 5.10 The building does not threaten to coalesce neighbouring towns or villages.

To assist safeguarding the countryside from encroachment;

- 5.11 The development is site-specific and needs to be located adjacent to the existing operational infrastructure at Cresswell BPS. It could not be located elsewhere. The development is the minimum required to fulfil operational requirements. As such, the works will not cause notable encroachment into the wider undeveloped countryside and will not stimulate other development pressures.

To preserve the setting and special character of historic towns;

- 5.12 The building will not adversely impact the preservation of the setting and special character of a historic town.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land;

- 5.13 The use could not be relocated to a brownfield urban site to encourage regeneration as the infrastructure proposed needs to be located adjacent to the existing infrastructure within Cresswell BPS.

- 5.14 Overall, it is not considered that the filtration building will unduly conflict with the purposes of including land within the Green Belt.

- 5.15 In addition, very special circumstances do exist to support the justification for the development in the Green Belt. The filtration building is required to ensure that the borehole pumping station is capable of supplying water to the surrounding area at a suitable quality. Clearly the essential need and public health requirements associated with this building accords with both local and national planning policy. Very special circumstances therefore exist to justify the building.

Design

- 5.16 The filtration building is the minimum scale necessary to fulfil its operational purposes and has been designed to be constructed from concrete and Juniper Green Steel Cladding. This design helps the building assimilate with the existing assets on site and aims to minimise the visual

impact on the surrounding area. Existing screening around the boundaries of the site will also help to further reduce any potential visual impacts of the development.

- 5.17 It is not considered that this design will result in any significantly increased impact on visual amenity and therefore the development is in line with Policy DC1 from the Staffordshire Moorlands Local Plan.

Access

- 5.18 The site is accessed via an existing gated access point on the south-east side of the site which leads to Cresswell Lane via a 200m long track. This access is considered suitable for the continued operation of the works and no alterations are proposed to the existing access as part of this application. It is not anticipated that the proposed development will adversely affect highways safety in accordance with NPPF Paragraph 115.
- 5.19 There are no public rights of way in proximity to the building which are considered likely to be affected.

Environmental/Technical Matters

- 5.20 The filtration building is located within the existing operational boundary of Cresswell BPS. Given the existing active nature of the site, the small scale of the works and the fact that good working practices were followed, it is considered that the works would have had a negligible effect on ecology. Therefore, the development is in line with Policy NE1 from the Staffordshire Moorlands Local Plan.
- 5.21 The building is located within Flood Zone 1 (low risk of flooding) and in an area which also has a low risk of surface water flooding. The building therefore is considered to be in line with Paragraph 155 of the NPPF.
- 5.22 The building is located within the operational boundaries of the site. Given the scale and design of the building and the distance from the nearest heritage asset, it is not considered that the building has a detrimental impact on any known designated heritage assets, in line with Policy DC2 from the Staffordshire Moorlands Local Plan.

6. Conclusion

- 6.1 This planning application seeks retrospective planning permission for the filtration building at Cresswell BPS, which is required permanently following advice from the Public Health & Standards team within Severn Trent who decided that the site cannot run without disinfection of the water, due to water quality issues at the site.
- 6.2 The building is situated within the existing operational site at Cresswell BPS and the development is not considered to result in any significantly adverse impacts on local ecology, heritage assets, highways or local amenity. The scheme will also ensure water quality is maintained to a high standard.
- 6.3 The development is considered to accord with the main aims of both local and national planning policy. It is therefore respectfully requested that planning permission be granted.