

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

**Our ref:** SV/2025/112837/01-L01  
**Your ref:** SMD/2024/0427  
**Date:** 07 February 2025

Dear Chris,

**PROPOSED SWIMMING POOL AND ASSOCIATED LANDSCAPING; WITH ALTERATIONS TO EXISTING DRIVE AND LANDSCAPING - BATH HOUSE BASFORD HALL ROAD, BASFORD, LEEK, STAFFORDSHIRE ST13 7ER.**

Thank you for your consultation sent on 24 January 2025. We note that your Council's Environmental Health Specialist Pollution Officer (consultation response dated 4/1/25) has recommended that our advice be sought relating to any potential impact on the local water environment from wastewater disposal from the swimming pool.

The following comments relate solely to the protection of controlled waters. Matters relating to human health should be directed to the relevant department of the Local Authority.

**Groundwater & Contaminated Land:**

The 1:50,000 geological map indicates that the site is located on the Principal Aquifer of the Chester Formation of the Sherwood Sandstone Group. There are no mapped superficial deposits underlying the point of discharge, however, Secondary A Alluvium deposits are mapped 15m to the east of the NGR provided.

The nearest surface water feature is a tributary of the Combes brook which is located 15m from the site at its closest point, passing through the Mill Pond at the site and flowing south towards Combes brook 430m from the site, in turn flowing into the River Churnet 860m from the site. The site is located within a Source Protection Zone 3 associated with the Severn Trent Wall Grange abstraction 3.2km northwest of the site.

We have now received and reviewed the following document:

- Swimming Pool Water Discharge Process at the Bath House

We note that the applicant proposes to discharge sand filter backwash water at a volume of 3000L (30m<sup>3</sup>/d) every 2 to 4 weeks. The discharged water is proposed to be released into a holding tank to allow chlorine to dissipate for 24 to 48 hours. The discharge is proposed to be released to ground once concentrations are observed to be <0.1ppm directly into a soakaway before reaching Combes Brook.

**Advice to Applicant:**

If an operator proposes a discharge to ground that contains filter backwash, an environmental permit from the Environment Agency will be required. Please note that direct discharges of filter backwash to surface water is not permitted. Exceptional cases

Environment Agency  
Hafren House Welshpool Road, Shelton, Shrewsbury, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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where effluent is put through a suitable treatment plant may be considered.

The permit application must include a risk assessment of the proposed effluent disposal and the discharge site for its suitability. The following issues which need to be considered within the risk assessment include:

- information on the suitability of the site – height of the water table, percolation (Vp) results, soil conditions, vulnerability of the underlying ground waters to pollution, the proximity of other abstractions and whether the site is located in a groundwater Source Protection Zone (SPZ)
- demonstration that there is no risk of run-off to surface waters
- preferably a properly constructed infiltration system (soakaway) / reed bed. The use of geotextile membranes can aid retention time of effluent

Please find below advice to the applicant regarding obtaining an environmental permit for their proposed discharge.

**Requirement for an environmental permit:**

The discharge of filter backwash water from a swimming pool associated with this development will require an environmental permit under the Environmental Permitting (England & Wales) Regulations 2016, from the Environment Agency, unless an exemption applies. The applicant is advised to contact the Environment Agency on Tel. 03708 506 506 for further advice and to discuss the issues likely to be raised. You should be aware that there is no guarantee that a permit will be granted.

Additional 'Environmental Permitting Guidance' can be found at:

<https://www.gov.uk/environmental-permit-check-if-you-need-one>

**The Environment Agency's approach to groundwater protection (pre-application):**

We would like to refer the enquirer to our groundwater position statements in 'The Environment Agency's approach to groundwater protection', available from gov.uk. This publication sets out our position for a wide range of activities and developments, including discharge of liquid effluents.

I trust the above will assist in your determination of the application. Please do not hesitate to contact me if you have any queries. A copy of the subsequent decision notice would be appreciated.

Yours faithfully,

**Nanette Brown**  
**Planning Officer - Sustainable Places**  
**Environment Agency West Midlands Area**