

Staffordshire Moorlands District Council
By email

Your ref SMD/2025/0080
Our ref DC/25/551v3
Date 03-NOV-25

Dear Planning Team

Location: Rushton Methodist Church Sugar Street
Proposal: Change of use for former Rushton Chapel. Proposed plans to convert part of the chapel to commercial

United Utilities provides the following comments to support the Local Planning Authority in their determination of the planning application detailed above, and to direct the applicant to further sources of support and guidance on matters that might impact their proposal. The letter and Appendix should be read in their entirety to support the determination, the design, and should the scheme be approved, the subsequent delivery of the proposal.

GROUNDWATER PROTECTION ZONES

Risk to public water supply

The site overlies the sandstone rock at depth, in a Groundwater Source Protection Zone (SPZ) 2. This forms an aquifer, abstracted at shallow depth by United Utilities for local public drinking water supply at nearby Rushton Spencer boreholes, located 400m to the west. The applicant should follow best practice on their use and storage of fuels, oils, chemicals and construction wastes, to remove the risk of causing pollution during construction.

We request the applicant contacts our Ground Engineering Team at the earliest opportunity by email at Groundwater@uuplc.co.uk. We recommend that the Environment Agency (EA) should be consulted on both the private Wastewater treatment (WwT) plant discharge and the design for fuel storage, if not already.

If direct communication results in an acceptable solution, the applicant must submit any agreed details to the Council for formal consideration. It is the applicant's responsibility to ensure the Council receive all information, relevant to their application.

We have concerns regarding the impact of the applicant's proposals on groundwater quality in the Source Protection Zone. There may be a pollution risk which could impact public drinking water supply. Based on the information currently available, United Utilities require information on the drainage of foul sewage in the southwest of the site (from office toilets & kitchen); SuDS proposals for surface water disposal and design of a large domestic / office fuel tank.

Private Wastewater Treatment Plant (WwTP)

The applicant should ensure that the private WwT plant (small sewage discharge to ground) does not cause pollution of surface water or groundwater. In particular, the proposal is to discharge to a non-standard historic soakaway, located in the adjacent lower lying field, which would imply discharge directly to the underlying sandstone, rather than a surface watercourse.

We recommend the applicant discuss the potential pollution risks with the Environment Agency to confirm the need for an Environmental Permit. Given the potential pollution risk and two separate approaches to wastewater drainage, UU would request the LPA place the following condition:

Condition

Prior to development commencing a Wastewater Drainage design for [Site] must be submitted to, and approved in writing by, the local planning authority.

Prior to occupation of the development (hereby permitted) wastewater drainage shall be completed in accordance with the agreed design and subject to receipt of an Environmental Permit if required.

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

Oil Storage Tank

A large tank, shown on the Site Plan, is new and for storage of fuel oil for both domestic and office use. Given the potential pollution risk to groundwater from release of mobile or dissolved contaminants at this site, UU request the following condition:

Condition

No development shall take place until a design for fuel storage has been submitted to, and approved in writing by the local planning authority. The design must consider measures to avoid release of pollutants to the environment, during use and supply of domestic fuel.

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

DRAINAGE

Directed by the principles set out in the National Planning Practice Guidance and the new National Standards for Sustainable Drainage Systems (2025) we require developers and Local Planning Authorities, to do all that they can to avoid surface water entering the public sewer, unless absolutely necessary. This applies to all proposed development. See Appendix 1.1 'Surface Water Hierarchy'.

All options for the sustainable management of surface water must be thoroughly investigated before we will accept any surface water connections from new development to the public sewer. Where a new surface water connection to the public sewer is proposed, we will require robust evidence to demonstrate the drainage hierarchy has been fully investigated and there are no more sustainable options available for the management of surface water.

To discuss their drainage proposals the applicant should contact our **Developer Services** team by email at SewerAdoptions@uuplc.co.uk. Alternative ways to contact the team are detailed in the Appendix, Section 5.0 'Contacts'.

When considering their drainage proposal, it is the applicant's responsibility to investigate the existence of any infrastructure that might impact their detailed design. This includes water, wastewater, operational and/or abandoned pipelines. United Utilities will not routinely carry out this assessment when reviewing drainage proposals submitted within a planning application. Where infrastructure exists, the drainage design must comply with the relevant United Utilities guidelines and/or Building Regulations. Further information is available on our website: [Working near our pipes - United Utilities](#). Failure to consider existing infrastructure when designing a drainage proposal may result in the applicant having to redesign proposals at a later date.

UNITED UTILITIES' PROPERTY, ASSETS AND INFRASTRUCTURE

It is the applicant's responsibility to investigate the existence of any pipelines that might cross or impact their proposed site and also to demonstrate the exact relationship between United Utilities' assets and the proposed development. The applicant should not rely solely on the detail contained within asset maps when considering a proposed layout.

It is important that the supporting information contained in the Appendix, Section 2.0 'United Utilities' Property, Assets and Infrastructure', is read in conjunction with this letter. This provides information that might impact a proposed layout and additional guidance that an applicant or developer must consider when United Utilities assets are located in, or in the locality of, the proposed site. Where United Utilities' assets exist, it is essential that the applicant, or any subsequent developer, contacts our Developer Services team prior to commencing any works on site, including trial holes, groundworks or demolition. See Appendix, Section 5.0 'Contacts'.

WATER EFFICIENCY IN NEW DEVELOPMENT

All new homes are required to meet the mandatory national standard of 125 litres of water used per person per day (l/p/d) as set out in Building Regulations Approved Document G. If your adopted development plan includes a policy that implements the tighter water efficiency standard of 110 l/p/d for new-build dwellings in Part 3 of Building Regulations, you should ensure that this is a condition of any planning permission you may grant. You should also consider whether there is any adopted development plan policy relating to a water efficiency in the construction of non-residential development. As this is a matter for the local planning authority / building control body, United Utilities would not be involved in the discharge of conditions relating to water efficiency.

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

Yours faithfully

United Utilities' Planning Team

APPENDIX:
Supporting information for the decision maker, applicant, developers and any other interested party

Whilst we provide the following information to support the design and delivery of the proposed scheme, we strongly recommend that the applicant, or any subsequent developer, contacts our Developer Services team or visits our website for more detailed advice on any aspects of United Utilities' assets and services that might impact their proposal. Full contact details can be found in Section 5.0 'Contacts' (below).

1.0 DRAINAGE DESIGN

Surface water (rainwater) flows are very large when compared with foul water flows that come from toilets, showers, washing machines, etc. It is usually surface water flows that increase the risk of sewer flooding, potentially impacting homes and businesses, and can result in unwanted spills from storm overflows into watercourses.

We have embarked on an ambitious investment programme to improve the performance of our wastewater network, particularly relating to the management of surface water. Our focus is to reduce the risk of sewer flooding and the prevention, frequency and intensity of spills from storm overflows, ultimately moving to a position where they are no longer necessary. As we work hard to improve the existing wastewater network, it is important that we do not compromise the results by accepting any unnecessary new surface water connections and that we take all opportunities for the removal of existing flows.

1.1 Surface water hierarchy

The design and delivery of surface water drainage systems must be in accordance with the National Standards for Sustainable Drainage Systems or any replacement of national standards. Full details, including the hierarchy of surface water runoff destinations can be found here: [National standards for sustainable drainage systems \(SuDS\) - GOV.UK](#)

The standards indicate that surface water drainage systems shall be designed, constructed, maintained and operated following a natural approach to managing water. This should mimic natural drainage, manage surface runoff at or close to the surface and as close to its source as practicable.

Therefore, drainage proposals for new development must be designed to maximise the retention of surface water on-site and minimise the volume and rate of surface water discharge off-site. Where surface water connections already exist, the applicant must provide clear evidence of these connections along with calculations on rates of discharge, to demonstrate a reduction in discharge rates. Without this evidence, applicants will be required to discharge at a greenfield rate of run-off.

United Utilities will only accept new surface water connections to the public sewer in circumstances where the applicant has provided robust evidence that the drainage hierarchy has been fully investigated and more sustainable options for the management of surface water

have been proven to be unfeasible. Surface water connections, particularly to the combined sewer, should only be considered as the last resort.

1.2 Adoption and construction of drainage systems

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.

If the proposal incorporates a SuDS component(s) which interacts with a sewer network that may be offered for adoption by United Utilities, we recommend the applicant seeks further advice regarding the SuDS design; detailed information is available on our website.

Our acceptance of any drainage strategy submitted by an applicant to the Local Planning Authority for approval does not infer that a detailed drainage design will meet the requirements for a successful adoption application. We strongly recommend that no construction commences until the detailed drainage design has been submitted directly to United Utilities, assessed and accepted in writing. Any work carried out prior to the technical assessment being approved is done entirely at the developer's own risk and could be subject to change.

2.0 PLANNING CONDITIONS; OUR APPROACH TO DRAINAGE CONDITIONS

When appropriate, United Utilities will request planning conditions relating to site drainage. This is important to ensure the delivery of quality drainage design for both new and existing customers. There is also a particular focus on the sustainable management of surface water thorough investigation of the drainage hierarchy which is critical in the management of flood risk and to reduce the frequency and intensity of spills from storm overflows, which is a shared priority for both United Utilities and the customers and communities that we serve.

2.1 Drainage design

In scenarios where **all** relevant information regarding drainage design is available; the design is acceptable and all opportunities for the sustainable management of surface water have been fully investigated, we will usually request a compliance condition to enable the delivery of the proposed design. If **any** relevant information is missing, or where there is insufficient evidence to demonstrate that the drainage hierarchy has been fully investigated, we will request a pre-commencement condition to ensure that all aspects of drainage design are fully considered before any work begins on site.

2.2 Management and maintenance of Sustainable Drainage Systems (SuDS)

The Local Authority should consider a SuDS management and maintenance condition for any scheme where SuDS is included within the proposal. An example condition is below that may be suitable in many circumstances.

Prior to occupation of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and

agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:

- (i) Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company; and*
- (ii) Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime.*

The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the development.

It is important to note that United Utilities cannot provide comment on an asset that is owned by a third-party management and maintenance company and therefore, would not be involved in any application to discharge a condition relating to SuDS management and maintenance.

3.0 UNITED UTILITIES' PROPERTY, ASSETS AND INFRASTRUCTURE

3.1 Water pipelines

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

For any works in the vicinity of water pipelines, including drainage, the applicant must comply with our 'Standard Conditions for Works Adjacent to Pipelines', which can be found on our website: [Working near our pipes - United Utilities](#)

3.2 Wastewater pipelines

United Utilities will not allow any new buildings or structures 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).

3.3 Water and wastewater pipelines and apparatus

A number of providers offer a paid for mapping service, including United Utilities. Alternatively, the plans can be viewed for free. See Section 5.0 'Contacts' for further details.

The position of underground apparatus shown on water and wastewater asset maps is approximate only and is given in accordance with the best information currently available. The actual positions may be different from those shown on the plans and private pipes, sewers or drains may not be recorded. 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 Section 5.0. 'Contacts' (below). United Utilities Water PLC 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.

Developers 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', which can be found on our website: [Working near our pipes - United Utilities](#).

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 pipelines and apparatus that are no longer in service, as well as pipelines and apparatus that are currently in operation. This advice is also relevant to any uncharted pipelines (pipelines that do not appear on our asset maps) that might be discovered on site either before or during construction. In this instance, the developer should contact our Developer Services team as soon as possible. See Section 5.0 'Contacts'.

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.

4.0 WATER AND WASTEWATER SERVICES, METERING AND CHARGES

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 Section 5.0 'Contacts' (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 a water meter must be installed to premises. Detailed guidance on whether the development will require a compulsory meter is available on our website within our published Charges Schemes; [Our household charges 2025/2026 | United Utilities](#) (Section 8.7).

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. See Section 5.0 'Contacts'.

To promote sustainable development United Utilities offers a reduction in infrastructure charges to applicant's delivering water efficient homes and draining surface water sustainably (criteria applies). Further information can be found on our website: [Sustainability - United Utilities](#)

Business customers can find additional information on our sustainable drainage incentive scheme at [Incentive schemes | United Utilities](#)

5.0 CONTACTS

Contact our **DEVELOPER SERVICES** team as follows:

Website (including 'Live Chat'): [Building & Developing - United Utilities](#)

Email:

WATER (water mains, supply and metering): DeveloperServicesWater@uuplc.co.uk

WASTEWATER (public sewers and drainage): SewerAdoptions@uuplc.co.uk

SLUDGE PIPELINES: DeveloperServicesWater@uuplc.co.uk

Telephone (Monday-Friday, 8am-6pm): **0345 072 6067**

GROUNDWATER PROTECTION ZONES:

Where the proposed site is located in a Groundwater Source Protection Zone, the applicant should contact our Engineering team for advice, by email at Groundwater@uuplc.co.uk

PROPERTY SEARCHES (FOR ASSET MAPS):

The public water and sewer records can be viewed via our online viewing facility for free. Viewings are by appointment only. Email propertysearches@uuplc.co.uk or call **0370 751 0101** to book an appointment.

Alternatively, 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 [Property Searches | United Utilities](#)

UNITED UTILITIES LEGAL SERVICES (FOR EASEMENT DOCUMENTS):

Copies of relevant deeds may be purchased from United Utilities Legal Services. This information is also available from Land Registry. To purchase a copy of easement documents from United Utilities, please email: LegalServices@uuplc.co.uk