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From: planningcomments@staffs Moorlands.gov.uk
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To: Planning Comments (SMDC)
Subject: Comment Received from Public Access

[REDACTED]

Application Reference No. : DOC/2026/0033 Site Address: Land East Of SUGAR STREET RUSHTON SPENCER
STAFFORDSHIRE SK11 0SE Comments by: Steve Russell

From:
The Old Vicarage

Rushton Spencer
Macclesfield
Cheshire
SK110RN

Phone: [REDACTED]

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Submission: Objection

Comments: Dear Sir/Madam,

I write to object to the current Discharge of Conditions submission on the basis that the information provided is materially inaccurate, incomplete, and does not reflect the drainage infrastructure now required under the Environment Agency permit.

The application relies on the resubmission of drainage drawing GK4270-C-001 Rev A (2024), which is demonstrably out of date and contains multiple errors and omissions. As such, it does not provide a reliable or lawful basis upon which consultees or the Local Planning Authority can assess the discharge of conditions.

The key issues are as follows:

1. Failure to Reflect Approved and Permitted Drainage Infrastructure

The submitted drainage information does not include infrastructure now required and forming part of the permitted drainage system under the Environment Agency permit (EPR/NB3349KM), including the 10-metre perforated pipe / infiltration element. This represents a material component of the drainage system and its omission means the submitted details are inconsistent with the lawful requirements governing the development.

In addition, the applicant's covering letter (dated 17 March 2026) refers to a 'surface water interceptor'; however, no such feature is shown or described within the submitted drawings or drainage report. This inconsistency further demonstrates that the submission cannot be relied upon as an accurate representation of the proposed system.

2. Omission of Downstream Receptor (Old Vicarage Well / Trough)

The drainage route description and supporting documentation omit any reference to the known downgradient receptor located at the Old Vicarage (well / trough feature).

This feature was not identified or assessed within the original consultation responses at the time the conditions were discharged. Subsequent correspondence indicates that it was not considered by consultees during the determination process, and some consultees have not provided any response on this matter.

Despite this, the submitted drainage information still does not incorporate or assess this receptor.

- Without identifying and assessing this feature, the application fails to demonstrate that:
 - water quality will be protected
 - additional discharge will not adversely affect the receptor, and
 - the interaction between discharge and receiving environment has been properly considered.

3. Absence of Baseline Hydrological Conditions

The submitted information does not describe baseline conditions of the receiving environment, including evidence of seasonal low or zero flow within the ditch / drainage channel. It is locally observable that this feature can experience periods of negligible or no flow, and its origin and classification are not clearly defined within the submission.

In the absence of this baseline context, it is not clear how the proposed discharge regime has been assessed, nor how its interaction with downstream features (including the Old Vicarage receptor) has been considered. This represents a fundamental gap in the information required for technical consultation.

4. Incomplete and Unclear Drainage Network

The submission fails to demonstrate the cumulative drainage arrangement across the wider area. In particular, there is no clarity regarding:

- ¿ the relationship with existing Environment Agency permitted discharges (e.g. Alley House and White Lodge),
- ¿ how these flows interact with the proposed system,
- ¿ how they combine with the proposed development and adjacent properties.

Without this information, it is not possible to assess cumulative impact on the receiving environment.

5. Technical Inconsistencies and Missing Detail

The submitted drawings and report contain a number of inconsistencies and unresolved technical issues, including:

- ¿ absence of the referenced surface water interceptor,
- ¿ unclear routing and interaction between surface water and treated effluent flows,
- ¿ lack of detail regarding the location, design, maintenance, and operation of the perforated pipe / infiltration element,
- ¿ no evidence of ground condition suitability (e.g. percolation testing) at the proposed infiltration location,
- ¿ unexplained reference to an ¿unknown source¿ within the drainage route,
- ¿ discrepancies in plan orientation (north arrow) which may affect interpretation by consultees.

These issues further demonstrate that the submission is not sufficiently detailed or accurate to enable proper technical review.

6. Failure to Provide Assessable Information

Accurate and complete drainage information is essential to enable statutory consultees to assess the proposal. In its current form, the submission does not provide a coherent or reliable description of the drainage system or receiving environment.

As such, meaningful consultation is not possible, and any discharge of conditions based on this information would be procedurally unsound.

7. Downstream Capacity and Highway Interaction Not Assessed

The submitted information does not address downstream capacity constraints or interaction with the wider drainage network. It is understood from Environment Agency consultation that the culvert beneath Old Leek Road may require increased capacity, and there is evidence of exceedance flows affecting the highway during peak rainfall events.

The applicant's own drainage information indicates that flows from the site ultimately connect to the same downstream system serving highway drainage infrastructure, including gullies on Sugar Street, to which direct connection has not been permitted.

Despite this, no assessment is provided of downstream capacity, exceedance flow routing, or the potential interaction between the proposed discharge and existing highway drainage constraints.

This omission further demonstrates that the drainage strategy has not been assessed in a complete or coherent manner.

8. Groundwater Sensitivity and Proximity to Historic Borehole

The site lies within a designated Source Protection Zone, indicating sensitivity in relation to groundwater. In addition, there are known historic borehole/well features in proximity to the proposed drainage system.

The submitted drainage information does not identify or assess these features, nor does it demonstrate how the proposed discharge (including infiltration elements) has been considered in relation to groundwater protection.

In the absence of this information, it is not clear how potential interactions with groundwater receptors have been assessed, particularly given the sensitivity of the location.

Conclusion

For the reasons set out above, the application fails to provide sufficient, accurate, and up-to-date information to support the discharge of drainage-related conditions.

The discrepancies between the submitted details, the Environment Agency permit requirements, and known site constraints indicate that the drainage strategy has materially changed. This requires proper reassessment through a formal planning application process, rather than reliance on outdated or incomplete submissions.

Accordingly, the application should be refused.

Yours faithfully,

Steve Russell on behalf of Mr and Mrs Russell

The Old Vicarage, Rushton Spencer

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