

Stafford Borough Council - Development
Control

Reference: PA-0007569/01
Customer reference: 26/42032/OUT
15 July 2026

OUTLINE PLANNING APPLICATION FOR THE CONSTRUCTION OF UP TO 80 DWELLINGS, INCLUDING ACCESS, LANDSCAPING, SUSTAINABLE DRAINAGE AND ASSOCIATED INFRASTRUCTURE. ALL MATTERS ARE RESERVED EXCEPT FOR PRIMARY VEHICULAR ACCESS FROM KNIGHTLEY ROAD

LAND OFF KNIGHTLEY ROAD, GNOSALL, STAFFORDSHIRE, ST20 0JS

Dear Gerard Walsh,

Thank you for consulting us on the above application, received on 2 July 2026.

We have the following comments to make on this application, which relate solely to the protection of controlled waters. Matters relating to human health should be directed to the relevant department at the Local Authority.

We have reviewed the following document submitted in support of this application:

- 'Phase I Geo-environmental Report – Proposed Residential Development Land Northeast of Knightley Road, Gnosall, Staffordshire' prepared by Sladen Associates (job number. 22 2508, dated October 2022).

Site Geological Context

The site is located on the bedrock of the Bromsgrove Sandstone formation, designated as a principal aquifer by the Environment Agency. Superficial Glacio-fluvial deposits (designated as Secondary A aquifer) are indicated to be present over the majority of the proposed site. The site is located within the total catchment (zone 3) of a groundwater source protection zone, designated for a public water supply abstraction approximately 1.4km away.

The applicants Phase I report identifies a former quarry within the proposed site area which was subsequently infilled. Reference to Environment Agency databases identifies this area as an historic landfill, known as 'Knightley Road Quarry', which accepted household waste. This former use of the site represents a risk of contamination that could be mobilised during redevelopment to pollute controlled waters receptors. It is noted that the former quarry/landfill only occupies the northwestern area of the proposed site. There is an additional former landfill located at the eastern boundary of the site – Rear of Old Barn Close- however it is unclear if this fully encroaches onto the proposed development area.

Protection of Controlled Waters

We note the proposals within the Phase I report to carry out an intrusive investigation prior to redevelopment of the site, to include sampling and analysis of soil samples. We recommend that any intrusive investigation be focussed on assessing the potential risk to controlled waters from this redevelopment, and should include sampling and analysis of groundwater, as well as appropriate risk assessments, to understand the potential risk to groundwater and linked surface water receptors.

Based on our above comments, we recommend that the following conditions be attached to any planning permission granted.

Condition: No development, or phasing as agreed below, shall take place until the following components of a scheme to deal with the risks associated with contamination of the site are submitted to and approved, in writing, by the local planning authority

- 1) A site investigation scheme, based on 'Proposed Residential Development Land Northeast of Knightley Road, Gnosall, Staffordshire' prepared by Sladen Associates, (job number. 22 2508, dated October 2022), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- 2) The site investigation results and the detailed risk assessment (1) and, based on these, an options appraisal and remediation strategy, if necessary, of the remediation measures required and how they are to be undertaken.
- 3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. This should include any proposed phasing of demolition or commencement of other works.
- 4) Prior to occupation of any part of the development (unless in accordance with agreed phasing under part 3 above) a verification (validation) report demonstrating completion of the works set out in the approved remediation strategy (2 and 3). The report shall include results of any sampling and monitoring. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action and for the reporting of this to the Local Planning Authority.

Any changes to these components require the express written consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To protect ground and surface waters ('controlled waters' as defined under the Water Resources Act 1991).

At this stage of the application, we are not clear on the proposals regarding the proposed foundation design for the residential development. We note that the Phase I report suggests that in the former infilled quarry area and in possibly part of the former access route, some form of deep piled foundations would likely be required. Piling and other intrusive foundation methods can using penetrative methods can result in risks to groundwater from, for example, pollution/turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. We therefore recommend that a piling risk assessment additionally be produced prior to development.

Condition: Piling or any other foundation designs / investigation boreholes using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To protect ground and surface waters ('controlled waters' as defined under the Water Resources Act 1991).

Informative - The above shall be based on the information submitted as part of the application and, where necessary, supported by:

- Foundation Works Risk Assessment
- A conceptual site model
- Specification of the type, number and depth of proposed piles/ foundations/ dimensions of shaft/tunnel/ design of heating and cooling system
- A detailed groundwater monitoring programme including a schedule for submission of interim and final monitoring reports
- A contingency action plan including the list of potential mitigation measures that will be implemented, should unexpected changes in groundwater quality be noted as a result of decommissioning piling works.
- [Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention](#)

I trust the above confirms our position and assists in your Councils determination of the application.

Yours sincerely,

Georgia Edwards,

National Contact Centre: 03708 506 506

westmidsplanning@environment-agency.gov.uk

Mance House, Arthur Drive, Hoo Farm Industrial Estate, Worcester Road, Kidderminster
DY11 7RA