

Shropshire Council
Planning and Development Services
The Gateway
The Auction Yard
Craven Arms
Shropshire
SY7 9BW

Our ref: SV/2015/108385/01-L01
Your ref: 14/05573/OUT
Date: 13 April 2015

F.A.O: Ms. K Townend

Dear Madam

OUTLINE APPLICATION FOR THE ERECTION OF A NEW FOODSTORE AND ASSOCIATED PETROL FILING STATION AT DUN COW FARM, ROCKS GREEN, LUDLOW, SHROPSHIRE, SY8 2DS

Thank you for referring the above application which was received on the 18 March 2015. We **object** to the proposed development, as submitted, and request additional information as detailed below.

The proposed development includes a petrol filling station (PFS) of which there is limited information submitted at this time. Whilst we note that this application is outline we seek confirmation on the PFS element of the proposals and, specifically, the location of the associated tanks to ensure no detrimental impacts on controlled waters.

Groundwater: As confirmed in the submitted Preliminary Assessment (Ref: TB/JF/SR/07322/PCAR, Dated July 2014) the site is located upon Raglan Mudstone and the underlying strata are classified as Minor (Secondary) Aquifer.

Groundwater Protection: Policy and Practice (GP3), 2013: National guidance on the storage of potential pollutants is set out in our GP3 available at:
<http://www.environment-agency.gov.uk/research/library/publications/144346.aspx>

Policy D2 – underground storage: We will **object** to underground storage on principal and secondary aquifers unless there is evidence of overriding reasons why:

- (a) the activity cannot take place on unproductive strata, and
- (b) the storage must be underground (for example public safety), in which case we expect the risks to be appropriately mitigated.

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

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The application should confirm that there are no other reasonably available sites on unproductive strata.

A feasibility study should confirm that there is a need for the tanks to be below ground; and that above ground options are not possible. We acknowledge there is a balance to be struck between environmental harm and proximity to sensitive uses, public safety, hazard zones including consideration of comments by your Petroleum Officer .

Providing this is confirmed, and the tanks are required to be underground, we would require the tanks be set above the water table in line with Policy D3.

Policy D3 – Sub Water Table Storage: We will **object** to storage of hazardous substances below the water table in principal or secondary aquifers.

We would recommend that a groundwater assessment be provided to confirm the depth to the water table. This may demonstrate that the tanks will be sited an appropriate distance above any possible groundwater levels. Alternatively, if there is likely to be sub water table storage of pollutants, it may be necessary for the application to be revised or refused. In the absence of a water table assessment we have concerns and would object to the proposed development as submitted at this time.

Pollution control: Where pollutants are stored underground we would expect operators to adopt appropriate engineering standards. For petrol stations, systems should meet the specifications within the 'Blue Book' (APEA, 2011) as a minimum requirement with monitoring systems.

Core Strategy Policy CS18: The above approach is supported by Policy CS18 of your adopted Core Strategy which states that proposals will ensure that new development enhances and protects water quality, including Shropshire Groundwater Resources.

Yours faithfully

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