

Cerys Jones

From: Sharon Holman
Sent: 25 January 2022 16:24
To: Cerys Jones
Subject: FW: P/2021/0640 Caravan Site - Land Between Holly Cottage and Chapel Farm, Whitewell

Hi Cerys,

Please could you put the drainage information on the civica file and re-consult with NRW – 14 days to comment please.

Thanks
Sharon

----- Forwarded message -----

From: **John Sumner** <john@sumnerconsultancy.co.uk>
Date: Thu, 20 Jan 2022 at 10:14
Subject: P/2021/0640 Caravan Site - Land Between Holly Cottage and Chapel Farm, Whitewell
To: Tim Williams <tim.williams@gpsltd.co.uk>

Hi Tim

I have just realised that I have not had any response from NRW regarding their letter of 15-11-21.

I would suggest therefore if you could please submit my response below to the planning officer.

NRW have made reference to their document *“Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation”*.

■

In this document it states the following:

“The following developments can be screened out as not likely to have a significant effect on a river SAC in relation to phosphorus inputs as there is unlikely to be a source of additional phosphorus or pathway for impacts:

- *any development that does not increase the volume of foul wastewater*

- *any development that improves existing water quality discharges by reducing the phosphorus load of wastewater, or by decreasing the volume of wastewater produced (e.g. by improvements to existing wastewater treatment infrastructure)*

- *private sewage treatment systems discharging domestic wastewater to ground, built to the relevant British Standard (BS 6297:2007+A1:2008) as long as the maximum daily discharge rate is less than 2 cubic metres (m³), the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain and is located more than 50m from a SAC boundary.*

Also, to ensure that there is no significant in combination effect, the discharge to ground should be at least 200m from any other discharge to ground. The density of discharges to ground should also not be greater than 1 for every 4ha (or 25 per km²)”.

I have calculated the maximum discharge to the drainage field to be 12800 litres/day, which is 12.8m³ per day.

The document also has a section:

“What does this mean for development proposals involving private sewage treatment systems”.

Within this guidance it states:

“We do not consider drainage schemes discharging to ground via a drainage field likely to have a significant effect on phosphorus loads within river SACs as long as it is built to the relevant British Standard and meets the screening criteria set out above.”

Other than the volume of discharge which an application would need to be made to NRW I do not think there is an issue with phosphorus.

Also with regard to the proximity of the drainage field to the watercourse to the north, the drainage field is 134m from the watercourse and it is considered that if the outfall from the treatment plant did percolate to the watercourse, which due to the distance is very doubtful, then any phosphate (or phosphorus) will have been filtered out.

Best regards

John

John Sumner IEng MICE

Director

Sumner Consultancy Ltd

Email: john@sumnerconsultancy.co.uk

Tel: 01939 210 786

Mobile: 07941 179 133

Web: www.sumnerconsultancy.co.uk

