



Forum House,
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26 March 2010

For the attention of Mr N Crowther

Principal Planner, Strategic Development Team
Planning Services
Arun District Council

BY E MAIL ONLY

Dear Mr Crowther

Planning Application BN/27/09 – Angels/Hyde Nurseries Barnham

I write to address the concerns raised by the Environment Agency in their letters to your authority dated 10 February 2010 and 16 March 2010 regarding the Surface Water & Foul Water disposal strategies we have proposed for the development of this site with up to 95 dwellings.

Letter from the EA dated 10 February 2010

The concerns/objection raised in this letter related to the submitted FRA and surface water disposal only.

Having considered the EA Comments, those of Southern Water Services Ltd (letter dated 18 February 2010 & subsequent e mail to you from Mr D Nuttall dated 2 March 2010) and those of the Councils Engineers, the applicants Drainage Consultants submitted a Foul & Surface Water Drainage Strategy for the site to the Council via us on 10 March 2010. (The relevant letters/e mails were appended to that Report).

In terms of Surface Water disposal the strategy sets out the principles for a Sustainable Urban Drainage Scheme for the site utilising permeable pavements and an existing network of drainage ditches which could be retained and improved as indicated on the submitted (and revised) existing site plan and indicative site layout plans (Drg Nos: 07.2009.02 & 10).

In their subsequent letter dated 16 March 2010 the EA confirmed that the suggested strategy was satisfactory in principle and following our e mail dated 17 March 2010 seeking clarification the EA has now written to us advising that they are able to **withdraw their objection on the basis of flood risk/surface water drainage (Copy e mail and letter attached)** and this matter can, therefore, be addressed by way of recommended condition 3 as set out in your report to your Committee on 31 March 2010.

Letter from the EA dated 16 March 2010.

The concerns/objection raised in this letter relate to the proposal to make a connection to the existing main foul sewer network (set out in the submitted March 2010 Drainage Strategy) which does not directly relate to the Surface Water Disposal issues addressed above.

The proposal for a connection to the existing foul sewer network was made on the basis that this is the approach preferred by the EA, SWS LTD and most developers and the fact that the clarification e mail to you from Mr D Nuttall (Atkins Ltd on behalf of SWS Ltd) dated 2 March 2010 states that SWS Ltd have:

“..... identified a point of connection, which would not have any negative impacts on existing levels of service. We are happy that the standard conditions for approval of details will be satisfactory in this situation.

It is important to note that the solution identified will not resolve existing problems, the solution is to discharge flows at the point on the system where there is adequate capacity.”

The EA disagree with SWS Ltd in these respects.

The EA considers that the proposed development would materially increase foul water discharge into the existing system which is known to have failings (due to surface water infiltration decreasing the capacity in the network to accommodate foul flows) and are concerned that this would result in an increased risk for pollution in respect of the Lidsey Rife and that the ongoing exploration of solutions to this existing situation have insufficient certainty to enable a “Grampian style” condition to be imposed in respect of the current proposals.

Firstly we must point out that SWS Ltd, the applicants Drainage Consultants and Barnham Parish Council agree that a scheme for up to 95 dwellings would not materially increase foul water discharge into the existing system to a degree that would result in the existing problems being made any worse.

Whilst the EA has provided evidence documenting the existing pollution incidents/problems that have occurred there is no evidence to demonstrate that the connection of the proposed development to the existing system would exacerbate the existing problem and a refusal of planning permission could not, therefore, be sustained/justified on this basis.

Secondly, and notwithstanding the above point, Circular 11/95 Paragraphs 38 – 41(end note 3) make it clear that the test as to whether or not a condition worded in a negative form, prohibiting development until a specified action has been taken (“Grampian style condition”) would be ultra vires is whether or not there are “reasonable prospects” of the action in question being performed and not “certainty” of performance as the EA state in their letter.

Moreover, Paragraph 27 of the PLANNING INSPECTORATE GOOD PRACTICE ADVICE NOTE 16/2010 states that:

“When considering Grampian-style planning conditions the House of Lords has ruled that the mere fact that such a condition had no reasonable prospect of fulfillment did not necessarily make it invalid. Such conditions may therefore be imposed unless there is no prospect at all of the action to which the condition refers being performed within the duration of the permission.”

Therefore the key question is whether or not a condition worded in the form currently recommended in your report to your committee requires an action which has no prospect at all of being performed within the duration of the permission

Southern Water Services Ltd consider that the details of a means of foul sewerage disposal via a connection to the existing public sewer system can be submitted to and approved in writing by those concerned within the duration of any outline planning permission granted but in deference to the concerns expressed by the EA and in order to provide ADC with yet more comfort the applicants drainage consultants have investigated the possibility of utilising a Package sewage Treatment Plant (STP) to serve the proposed development and we attach a copy letter and details setting out their findings for your file.

This information demonstrates that if a connection to the public foul sewer utilising standard requisition procedures does not prove possible at detailed application stage (as the EA believe) it would be possible to provide the development with an adequate foul drainage system that did not rely on such a connection by way of an alternative solution.

If such a system were utilised as part of any details submitted to discharge the condition suggested/recommended in your committee report, the evidence demonstrates that the plant could be of the requisite size to serve the development and could be sited underground anywhere on the site with (subject to the appropriate EA license) access to discharge to an approved surface water drainage system.

Based on the most onerous estimates the average resident occupancy of a scheme for up to 95 dwellings would not exceed 300 and the example company could provide a STP capable of providing for up to 375 residents. Moreover if two STP were installed at the site (as suggested by the applicants Drainage Consultants) sewage flows could be split 50/50 between the two plants to ensure excess capacity and continuity in the event of maintenance issues.

Such a private system (if installed) would be managed and maintained by the residents of the new properties by way of a management company established for the purpose and these details could be controlled by virtue of the recommended condition at detailed application stage.

In short whilst the concerns of the EA arising from existing pollution incidents in the Barnham area are understood there is no reason to assume that the proposed development would make that situation any worse and there is in any case a reasonable prospect that a means of foul water disposal could be designed and approved to address foul water disposal from the development at detailed application stage (with or without a connection to the public sewer) and therefore no reason why the standard condition that you have recommended in your committee report could not be utilised in this case in accordance with Circular 11/95.

I trust that you will find this information of assistance.

Yours Sincerely

Paul Collins
Director PPC Ltd

cc. Environment Agency, Southern Water Services Ltd, Robert Clark Associates Ltd and The Client.

Enc

Planning & Property Consultants Ltd
Chartered Members of the Royal Town Planning Institute
Site Appraisals, Planning Applications and Drawings, Planning Appeals and General Planning and Property Advice

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Mr Paul Collins
Ppc Planning & Property Consultants Ltd
Forum House, Stirling Road,
Chichester, West Sussex
PO19 7DN

Our ref: HA/2010/108965/05-L01

Your ref: BN/27/09/

Date: 25 March 2010

Dear Mr Collins,

OUTLINE APPLICATION FOR DEMOLITION OF ALL EXISTING BUILDINGS/STRUCTURES & REDEVELOPMENT WITH UP TO 100 DWELLINGS (INCLUDING UP TO 40 AFFORDABLE HOMES) AT ANGELS & HYDE NURSERIES YAPTON ROAD BARNHAM

Thank-you for your e-mail of the 17th March 2010.

In response to the points you have raised:

1. As stated in my previous letter of the 16th March we are formally **Objecting** to this application as submitted, but as I am sure you are aware, the decision as to whether to approve or refuse this application lies with Arun District Council.

We are a statutory consultee under the Town and Country Planning (General Development Procedure) Order 1995, Article 10. This not only relates to flood risk, but also to planning applications involving the retention, treatment or disposal of sewage.

2. We are prepared to defend this Objection at Appeal/Inquiry but believe Arun will also input into this if they choose to refuse the application, as they are fully aware of the drainage issues in that area.

We will be able to provide substantial evidence of continuing pollution offences in this area, of which the primary one will be that Southern Water received and accepted a formal caution for the offence of causing and knowingly permitting untreated sewage effluent, polluting matter and solid waste to enter the Barnham Rife which is a controlled water at Tars Farm, Church Lane, Barnham contrary to the Water Resources Act 1991, Section 85 (1)(3). This was for an offence committed on the 23rd January 2009. This caution was issued following other documented offences, and there have been further incidences this year which we will of course be able to provide to an Inspector in the event of an Appeal.

However, we would be grateful if you could supply us of a plan showing **where** the connection point which has been identified by SW as able to deal with the increased capacity.

3. **We are able to withdraw our objection on the basis of flood risk/surface water drainage**, as there is now an identified outfall point for surface water (ie the ditches) which means that it should be possible to design something which will work at reserved matters stage. I apologise if this was not clear in my previous letter.

4. I have attached a copy of our internal policy on effluent disposal in sewered areas for your attention, but cannot comment on the suitability of such a scheme having received no details of such as yet.

5. If the Council are recommending approval of this scheme, we are of course happy to provide suggested conditions on a 'without prejudice' basis, and I have attached these at the end of this letter, but these may not be comprehensive as we do not ordinarily supply conditions whilst also maintaining an Objection due to the confusion which this can cause.

I trust that the above comments are satisfactory but if you require any further information please contact me.

Yours sincerely,

Miss Kate Attrill
Senior Area Planning Liaison Officer

Direct dial 01903 703918

Direct e-mail kate.attrill@environment-agency.gov.uk

www.environment-agency.gov.uk

Condition 1 - Drainage – scheme to be agreed

No development shall commence until such time as a scheme to dispose of foul and surface water has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

Reasons: In the interests of complying with Planning Policy Statements 23 and 25.

Condition 2 – Updated Ecological report

No development shall commence until an updated ecological report which has clearly addressed the on-site ditches has been submitted to and approved in writing by the local planning authority.

Reason: The ecological report originally submitted neither identified the on-site ditches or surveyed them. These ditches were later identified as part of the Flood Risk Assessment. Government policy on planning and nature conservation as set out in Planning Policy Statement 9 (PPS9) requires that planning decisions should prevent harm to nature conservation interests (PPS9, Key Principles paragraph 1ii). This has not been adequately demonstrated in the present application. Based on the results of this updated report, further ecological surveys may be required, and if protected species are found, a mitigation strategy will also be required, the proposals of which shall be carried out as agreed, and if compensatory habitat is required, that shall be retained thereafter.

Environment Agency Policy		
Effluent disposal in sewerred areas		
Policy Number: 769_06		
Policy Statement Developments discharging 'domestic' sewage will be expected to connect to the public foul sewer where it is reasonable to do so. We will not normally grant a discharge consent for a private sewage treatment system where it is reasonable to connect to the public foul sewer. Likewise, discharges of trade effluent will be expected to connect to the public foul sewer where it is reasonable to do so and agreement can be reached with the sewerage undertaker to issue a trade to sewer consent.		
Objectives The objectives of this policy are to:		
• satisfy the requirements of relevant England, Wales and EU legislation; • protect the environment; • deliver our own and Government policies, codes of practice, guidance and targets; • support Development Plan policies; • take into account costs, practicality and sustainability when deciding if a connection to the public foul sewer is reasonable; • work in close co-operation with local planning authorities, water companies and developers to identify local and regional strategic needs for sewerage service provision; • resist the proliferation of private sewage treatment in locations where it is reasonable to connect to the public foul sewer, at both development planning and planning application stages.		
Policy Authors:	Clare Blacklidge, Policy Advisor, Water Quality Strategy & Policy, Strategic Unit Wales; Will Tipper, Technical Advisor, Surface WQ NOPTS.	
Policy Sponsor: John Fraser (Head of Water Quality)		
Signature of Authorisation by Policy Sponsor:		
Version: 1	Date: 15/12/06	Available from: Easinet

If you have any queries relating to the content of this document, or suggestions for improvements, please contact the Policy Author named above.

If any of the terms or acronyms used in this document is unfamiliar you might find the definition in the Glossary on the Agency's Intranet site:
Information Resources > [Glossary of Terms and Acronyms](#).

Explanatory Note

Effluent disposal in sewered areas

Background:

Effective sewage disposal from dwellings and industrial/commercial developments is essential for the protection of public health and the environment. Sewage treatment and disposal can be provided by a sewerage undertaker (i.e. public foul sewer) or via a variety of private sewage treatment systems. The relevant legislation and guidance is outlined below.

Public sewers

Part IV of the Water Industry Act 1991 places duties on sewerage undertakers in relation to sewerage services in their areas:

- **Section 94** – the provision, improvement, extending, cleansing and maintaining a system of public sewers so as to effectually drain an area, and to effectually treat the contents;
- **Section 98** – this allows the requisition of a sewer from the sewerage undertaker;
- **Section 102** – a person may request the sewerage undertaker to adopt an existing sewer;
- **Section 104** – allows agreements with sewerage undertaker to adopt sewers and sewage treatment works on completion;
- **Section 106** – right of connection.

The Urban Waste Water Treatment Directive 1991 requires that all properties in an agglomeration are connected to a collecting system, unless connection would provide no environmental benefit or would involve excessive cost. The decision to allow an individual system must be made on a case by case basis, preferably at the planning application stage, and the individual system must provide protection to the environment equivalent to that provided by connection.

These duties are supplemented by the Urban Waste Water Treatment (England and Wales) Regulations 1994. The regulations require water companies to provide collecting systems for built-up areas where the population equivalent (p.e.) is greater than 2000, and to provide secondary treatment for discharges to inland and estuarine waters where the p.e. exceeds 2,000, and for discharges to coastal waters where the p.e. exceeds 10,000. It is government policy that urban waste water discharges greater than 2000 p.e. to coastal waters receive secondary treatment. All urban waste water discharges less than 2,000 p.e. must receive “appropriate treatment”, the extent of which is determined locally by us.

Building control

- Section 21(4) of the Building Act 1984 states that the local authority may require a proposed drain to connect with a sewer where that sewer is within 100 feet of the site of a new building or extension and the land between the development and the sewer is owned by the applicant.

Approved Document H issued by the Office of Deputy Prime Minister (now DCLG) as guidance to

the requirements of the Building Regulations 2000 (SI2000/2531 as amended by SI2001/3335) covers sewage disposal and sets out, in part H1, a hierarchy for disposal of foul water, as follows:

- a public sewer; or, where that is not reasonably practicable,
- a private sewer communicating with a public sewer; or, where that is not reasonably practicable,
- a private sewage treatment plant (including a septic tank); or, where that is not reasonably practicable,
- a cesspool.

Part H2 gives the requirements and guidance for siting, design, construction and maintenance of private sewage treatment systems, septic tanks and soakaways, and cesspools.

Planning requirements

DETR Circular 3/99 / Welsh Office Circular 10/99 sets out guidance for local planning authorities (England and Wales) to consider when determining planning applications that indicate the use of non mains drainage. This guidance applies the same hierarchy Approved Document H1. It states that the preferred option will always be to provide a system of foul drainage discharging into a public sewer. Only if the cost and/or practicability demonstrate that connection to public foul sewer is not feasible can private treatment systems be considered.

Planning Policy Wales states that development proposals in sewered areas must connect to the public main sewer. Development proposing the use of non-mains drainage schemes will only be acceptable where connection to the public foul sewer is not feasible.

PPS23 'Planning and Pollution Control' sets out the framework for considering pollution control aspects in planning decisions. PPS 12 'Local Development Framework' includes reference to provision of infrastructure such as sewerage.

We are a statutory consultee under the Town and Country Planning (General Development Procedure) Order 1995, Article 10. This relates to planning applications involving the retention, treatment or disposal of sewage. The Agency will apply its policies and guidance in responding to such applications.

Private sewage treatment discharges

The statutory requirements detailed in sections 85 and 88 of the Water Resources Act 1991 make it an offence to cause and/or knowingly permit poisonous, noxious or polluting matter to enter controlled waters without our consent. A permit is usually required, which will include conditions that adequately protect the receiving environment. Defra and Welsh Assembly Government are currently considering our proposal to directly regulate discharges from very small STWs (5m³/day or less). The proposal is part of our Modernising WQ Regulation programme. If Defra and the Assembly agree, direct regulation is likely to start in late 2007 and this policy will be updated to reflect that.

Policy drivers

We are increasingly receiving planning application consultations and applications for discharge consents that include private effluent treatment systems in locations where it would be reasonable to connect to the public sewer. This policy aims to ensure the relevant legislation, policy and guidance on connection to sewer is given due consideration in responding to these situations. Hence, there is a presumption that premises will connect to the public foul sewer where it is reasonable. Criteria for assessing reasonableness include distance from existing foul sewer, cost, sustainability, geology, and river/rail crossings. Our Groundwater Protection Policy and Practice complements this policy and should be consulted for all proposals for foul drainage disposal to ground. It is for the applicant to demonstrate to the local planning authority that it would be unreasonable to connect to the public foul sewer in terms of cost or practicality or that the proposed system offers a more sustainable solution than connection to the foul sewer. The applicant must complete a foul drainage assessment

and submit this to the local planning authority with their planning application. This will enable the authority to decide on whether they need to consult us and whether the applicant's proposed option is reasonable.

Desired Outcomes:

- Compliance with relevant England, Wales and EU legislation, policies, codes of practice and guidance;
- Delivery of relevant Defra, Department for Communities and Local Government (DCLG) and Welsh Assembly Government strategies and Public Service Agreement targets;
- Delivery of our corporate strategy and targets;
- Achievement of environmental quality objectives through effective and proportionate responses to planning applications, development plans and regulation of point source discharges to controlled waters;
- Sustained protection and enhancement of the environment that balances the social, economic, resource and environmental aspects of sustainability;
- Private sewage treatment systems are limited to cases where it is unreasonable to connect to the public foul sewer on the grounds of cost or practicality or where the proposed system offers a more sustainable solution than connection to the foul sewer;
- Long term planning that matches the sewerage infrastructure capacity with the planning authority's and the sewerage undertaker's development proposals.

Audience

Internal: this policy is relevant to Environment Protection, Planning Liaison, Groundwater and Water Quality Regulatory teams, Policy, Process Management, Regional Strategic Units (England) and Strategic Unit Wales.

External: this policy will be of particular interest to Government Departments, water companies, local authorities, regional authorities, developers, consultants, architects, industry, non-governmental organisations and members of the public.

References

Water Resources Act 1991, as amended.

Water Industry Act 1991, as amended.

Urban Waste Water Treatment Directive 1991 (91/271/EEC).

Urban Waste Water Treatment Regulations (England and Wales) 1994.

Building Act 1984.

Building Regulations 2000 (SI 2000/2531) as amended by Building (Amendment) Regulations 2001 (SI2001/3335).

Building Control Guidance ODPM 2000 – Approved Document H.

DETR Circular 3/99 / Welsh Office Circular 10/99 – Planning requirements in respect of the

Use of Non-mains sewerage incorporating septic tanks in new developments. April 1999.

Planning Policy Wales, Welsh Assembly Government, March 2002, paragraphs 12.4.1, 12.4.2 and 12.4.3.

The Provision of New Drains and Sewers in England and Wales: Consultation Paper. DETR and National Assembly for Wales 2000.

PPS23 'Planning and Pollution Control' DETR 1994.

PPS12 'Local Development Frameworks' ODPM 2004.

Environment Agency Groundwater Protection Policy and Practice 2006.
Environment Agency Guidance on effluent disposal in sewerred areas 2006.

Policy Implementation Plan

Policy Number:		769_06
1.	Who are the target audiences.	• Internal: Environment Protection, Planning Liaison, Groundwater and Water Quality Regulatory teams, Policy, Process Management, Regional Strategic Units (England) and Strategic Unit Wales. • External: Government Departments, water services companies, local authorities, regional authorities, developers, consultants, architects, industry, non-governmental organisations and members of the public.
2.	What do they need to know?	• Content and scope of the policy. • How the policy is going to be implemented.
3.	When do they need to know it?	• Staff: In advance of its implementation. • Customers: Prior to the commencement of developments in a sewered area.
4.	How will they be told?	• Internal: through process cascade procedures and intranet. • External: relevant external journals and existing external liaison groups.
5.	Who will tell them?	• The policy will be cascaded through the Surfacewater and Planning Liaison NOPTS to relevant Agency staff and external stakeholders.
6.	Competencies to undertake the task.	• The relevant competencies to implement the policy will be defined by NOPTS. • Training will be provided to staff where necessary to fulfil the competency requirements.
7.	What supporting documents must be developed?	• Supporting guidance has already been released (538 06).
8.	What resources are required?	• The revision and publication of this policy will not require any additional resource above that already allocated according to the corporate plan and service levels assigned in the Environment Protection Priority Planning Exercise (EPPPE). This policy is likely to improve organisational efficiency. • The corporate plan and EPPPE service levels are reviewed each year. • The resource requirements for implementation of the policy will be monitored, assessed and reviewed by Process Management.

9.	Monitoring of Progress Method(s): Success Criteria: Date(s) Undertaken Comments:	Policy and NOPTS will monitor the performance of this policy and the implementation plan will be progressing as intended if: • everyone who should be aware of the policy has received it, is aware of its content, clearly understands it and is implementing it effectively; • there is no proliferation of private sewage treatment systems in areas where it is reasonable to connect to the public foul sewer; • long term plans are under development, matching sewerage infrastructure capacity with the local planning authorities' and water companies' development proposals; • feedback from customers is used to improve the process and systems.	
10	Authorisation	<u>Policy Sponsor</u> Sign: Name: <u>John Fraser (Head of Water Quality)</u> Title: Date: <u>Chair Approval Body</u>	
11	Review Date	15/03/08	Version: 1

PPC Planning

From: "PPC Planning" <office@ppcplanning.co.uk>
Date: 17 March 2010 20:16
To: "Kate Attrill" <kate.attrill@environment-agency.gov.uk>
Cc: <Neil.Crowther@arun.gov.uk>; <simon.power@arun.gov.uk>
Attach: Angels & Hyde Nursery final Objection.doc
Subject: Fw: Angels & Hyde Nursery final Objection

Dear Ms Attrill

Thank you for your copy letter dated 16 March 2010 the contents of which I will discuss with my clients Drainage Consultants before replying in full to the Local Planning Authority.

In the meantime please can you clarify the EA position by reference to the following points:

1. Is the Agency intending to issue a direction requiring ADC to refuse PP on the grounds stated in its letter?

2. In the event that ADC does choose to refuse PP on the basis of your latest objection and given the relevant statutory undertakers (SWS Ltd) consultation e mail response to ADC (Copied with the submitted Drainage Strategy) which states:

"we have identified a point of connection, which would not have any negative impacts on existing levels of service. We are happy that the standard conditions for approval of details will be satisfactory

in this situation. It is important to note that the solution identified will not resolve existing problems, the solution is to discharge flows at the point on the system where there is adequate capacity."

Can you confirm that the EA is prepared to defend its objection with the necessary evidence at any subsequent/possible planning appeal Inquiry or whether it considers that ADC should take on this responsibility? (See Paragraphs B23 - 27 Circular 03/2009). If the agency does intend to provide evidence (as opposed to the current assertions) regarding the inability of the existing network to accommodate the net increase in flows from the development at the connection point identified by SWS Ltd and/or the direct causal link between this alleged inadequacy and the pollution concerns raised please may we view that evidence now so that we can consider same?

3. Does the agency now withdraw its original Objection relating to surface water and flood risk in its letter dated 10 February 2010 on the basis that it is now satisfied that standard conditions relating to the submission/approval of a detailed surface water disposal scheme prior to the commencement of development would provide adequate control in terms of PPS25 flood risk (The first paragraph in your latest letter is not clear on this point)

4. If the applicants indicated that they do not intend to apply for a connection to the main foul sewer network and intended to rely on an on site package treatment plant instead and a condition was imposed on any approval requiring same would the EA withdraw its latest objection? Presumably any solution which provides a satisfactory disposal system for the submitted scheme without relying on the existing network would address the potential pollution issues now raised?

5. Your letter (last paragraph) refers to relevant conditions being imposed in the event that ADC are minded to approve . Please can you provide these now so that we might consider same prior to any decision being made albeit on a without prejudice basis.

Please can you reply promptly as I will need to respond to your letter in full to ADC by 31st March 2010.

Paul Collins BA (Hons) DipTP MRTPI

28/03/2010

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From: [Attrill, Kate](#)
Sent: Wednesday, March 17, 2010 6:00 PM
To: neil.crowther@arun.gov.uk ; simon.power@arun.gov.uk
Cc: [Baldry, Fay](#) ; [Hyland, Hannah](#) ; [Tinton, Elliot](#) ; [Mcleod, Catherine](#) ; [PPC Planning](#)
Subject: Angels & Hyde Nursery final Objection

Dear Neil,

Please find attached our formal response, which is an Objection.

Kind regards,

Kate.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.

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Paul Collins
PPC Ltd
Forum House
Stirling Road
Chichester
West Sussex
PO19 7DN

Our Ref: 1334/RTFC

Your Ref:

22 March 2010

Dear Paul

Angels and Hyde Nurseries, Barnham
Foul Water Drainage

I refer to our recent telephone conversations concerning the above and write to confirm the matters discussed.

I understand that there may be some difficulty with an unrestricted connection from the site to the public foul sewerage system and that an alternative means of foul drainage may be required. We have considered this carefully and can confirm that a packaged sewage treatment plant (STP) could be installed to service the proposed new development of up to 95 dwellings.

The STP could be located almost anywhere on the site to suit the layout. It will require a positive outfall and any of the watercourses on the site would be suitable, following the clearance and maintenance works that have been recommended in the Drainage Strategy. It would be an underground unit with only a small brick or PVC above-ground housing for an air blower and electrical control panel. For this number of dwellings, we would recommend that two smaller STP's are provided side-by-side operating in parallel, rather than a single large unit. This will allow one to be taken out of service for maintenance purposes, as and when required, without significantly affecting drainage from the site. A suitable STP would be the Entec Biotec unit (see attached) but there are other manufacturers supplying similar units for these applications.

The rate of outflow to the watercourse would depend upon the final mix of new dwellings and predicted water use but would be in the order of 0.5 to 1.0 litres/second as an average throughout the day, although this will peak at certain times of course. We would suggest that this rate of flow would not be significant in the watercourse. For comparison, the 1 in 1-year surface water run-off from the greenfield site is around 6 litres/second and the 1 in 100-year run-off 23 litres/second.

As Southern Water has indicated that they have identified a suitable point of connection for foul drainage from the site, it would be unfortunate if an STP were to be the chosen solution but such units can constitute an adequate system of drainage where no reasonably practicable alternative is available.

Yours sincerely

Robert Clark Associates Ltd.

Entec Biotec™ P40-P375

Package Sewage Treatment Systems
for Residential, Business & Leisure Applications



Sustainable, Reliable, Affordable


Kingspan®

BIOTEC™ FROM KINGSPAN ENVIRONMENTAL

P40-P375 Range of Package Sewage Treatment Systems

The Biotec™ range of package sewage treatment plants is designed to treat the sewage from a whole range of developments where access to the main sewer is not possible.

Suitable for housing estates, camping and caravan sites, rest homes, schools, construction sites, hotels, country clubs, public houses and restaurants.

Features

- Below ground installation, minimises visual impact
- The cover has been specifically designed to blend with surroundings with generous access for maintenance
- Efficient air blower is quiet and ensures low running and maintenance costs
- Controlled ventilation minimises risk of odour nuisance
- Casing construction to BS4994 (1987) in GRP (Glass Reinforced Plastic)
- Built in surge flow control
- Minimal running costs (except where site levels or location requires an additional pump)
- 1 year warranty on blower
- All Kingspan Environmental products are manufactured under the quality procedures of BS ISO 9001: 2000



Design

Biotec™ sewage treatment plants are available as standard or high level nitrification plants. They employ a development of the well proven aerobic biological process for the purification of sewage and wastewater.

This process takes place in four distinct stages:-

1. Primary Settlement

This is the initial stage of treatment and simply involves the retention of coarse solids present in raw sewage and waste water for subsequent gradual breakdown.

2. Carbonaceous Biological Treatment

Substantial BOD reduction takes place here, where the carbonaceous pollutants are removed by presenting the sewage to the micro-organisms in the presence of oxygen. The treatment is achieved by continually distributing the screened liquids over the biological media.

3. Nitrifying Biological Treatment

Additional treatment is provided in order to reduce the Ammoniacal Nitrogen. There are several levels of Nitrification available. For most applications the standard is suitable. However, for particularly sensitive applications a high level unit can be selected.

4. Final Settlement

A natural by-product of biological treatment is humus sludge and this is separated for further treatment. The treated effluent is discharged via the outlet. Under normal domestic conditions 20mg/L BOD, 30mg/L SS, 20mg/L Ammonia can be achieved with standard plants and 10mg/L Ammonia can be achieved with high rate plants.

Options

- Pumpsets - where the treated effluent has to be dispersed to a higher area because of site levels or ground water.
- Sample Chambers - for accurate and convenient effluent sampling, as required by the Environment Agency.
- Alarm Systems - for the warning of power or equipment failure.

BIOTEC™ P200-P375

Installation

The unit is normally installed below ground with the cover flush, however it can protrude above ground if required by site levels. Ideally siting should be under a pedestrian area no closer than 10m from the nearest house. The tank should be vented independently or back through a local building vent stack.

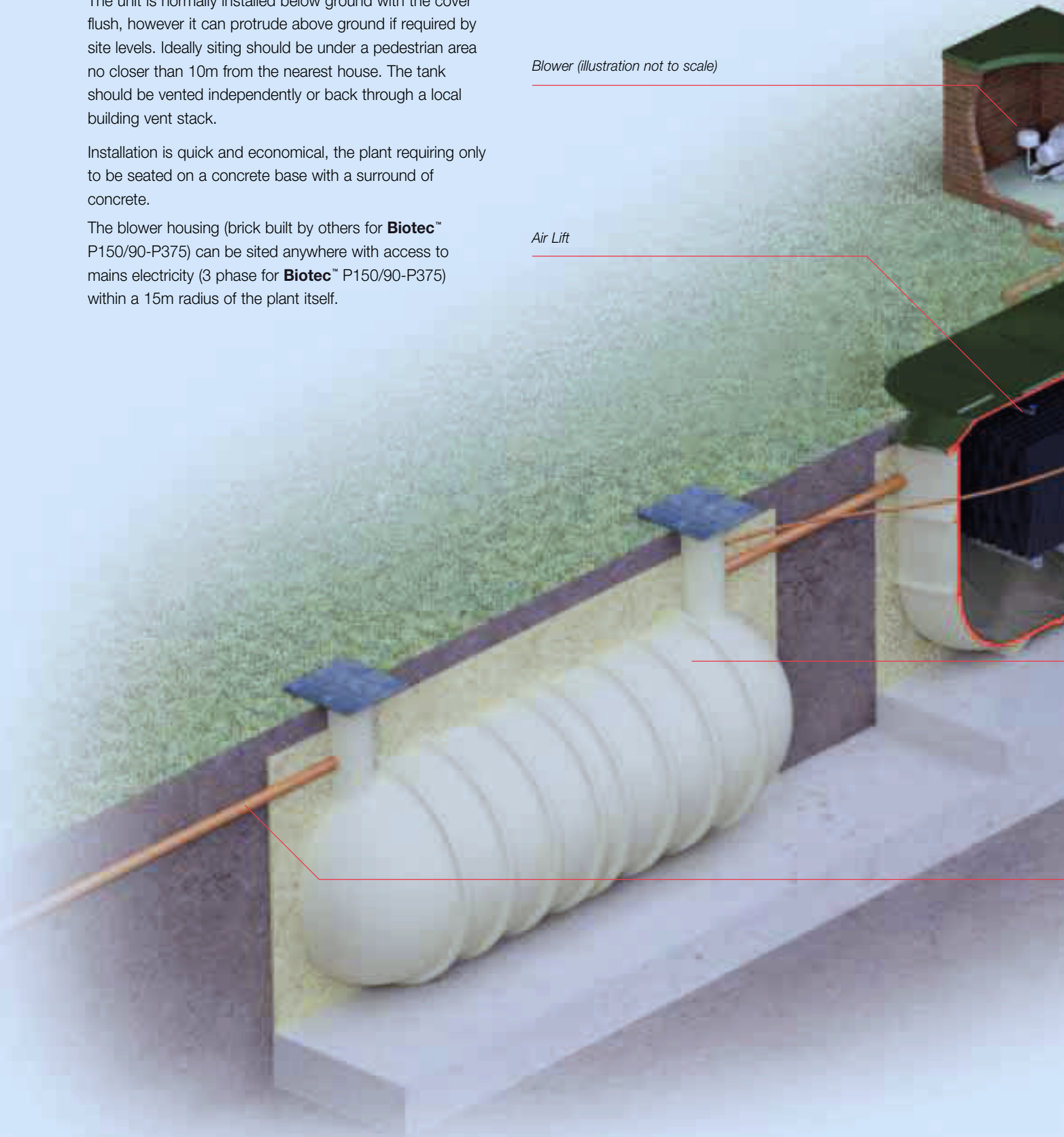
Installation is quick and economical, the plant requiring only to be seated on a concrete base with a surround of concrete.

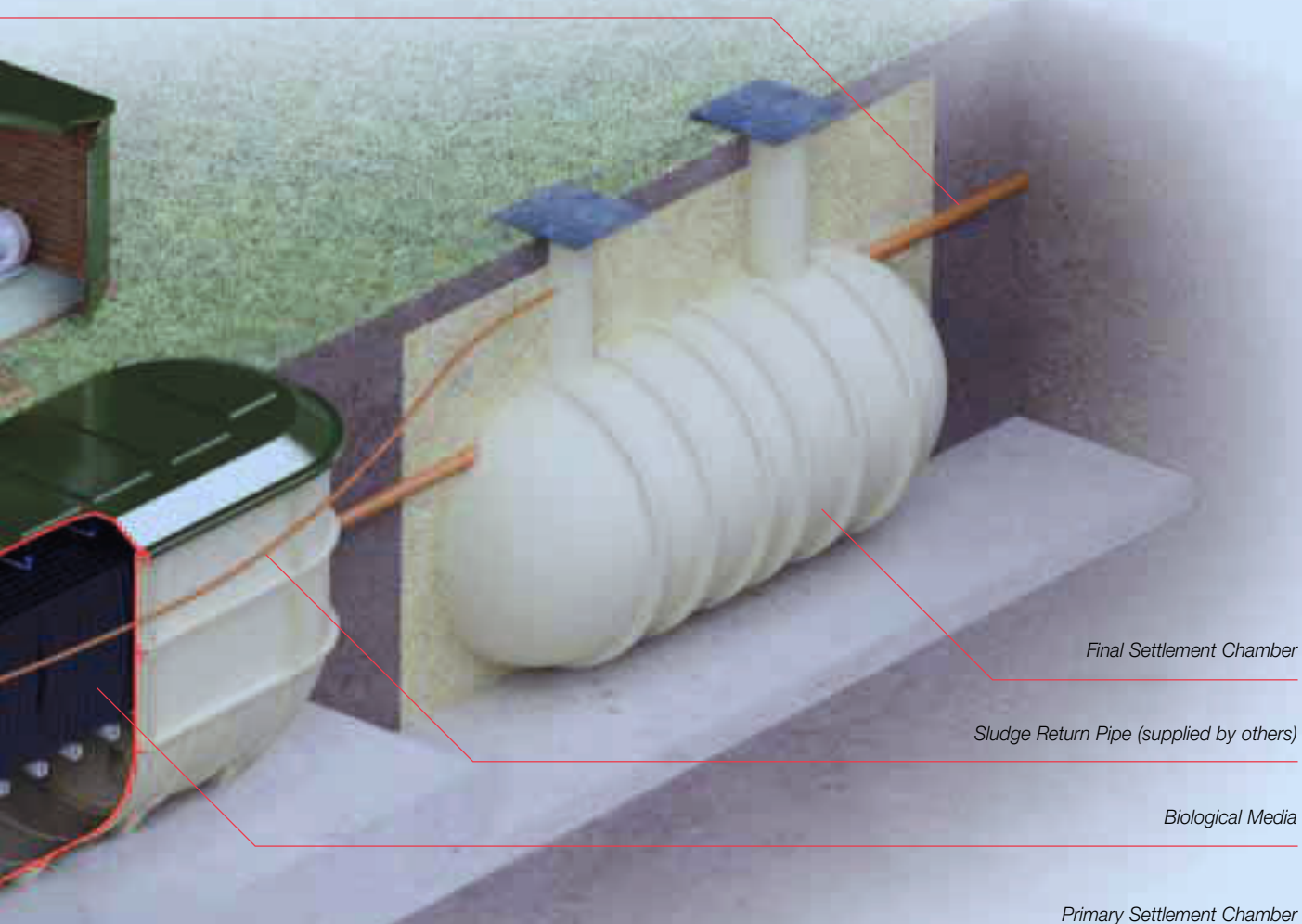
The blower housing (brick built by others for **Biotec™** P150/90-P375) can be sited anywhere with access to mains electricity (3 phase for **Biotec™** P150/90-P375) within a 15m radius of the plant itself.

Outlet

Blower (illustration not to scale)

Air Lift



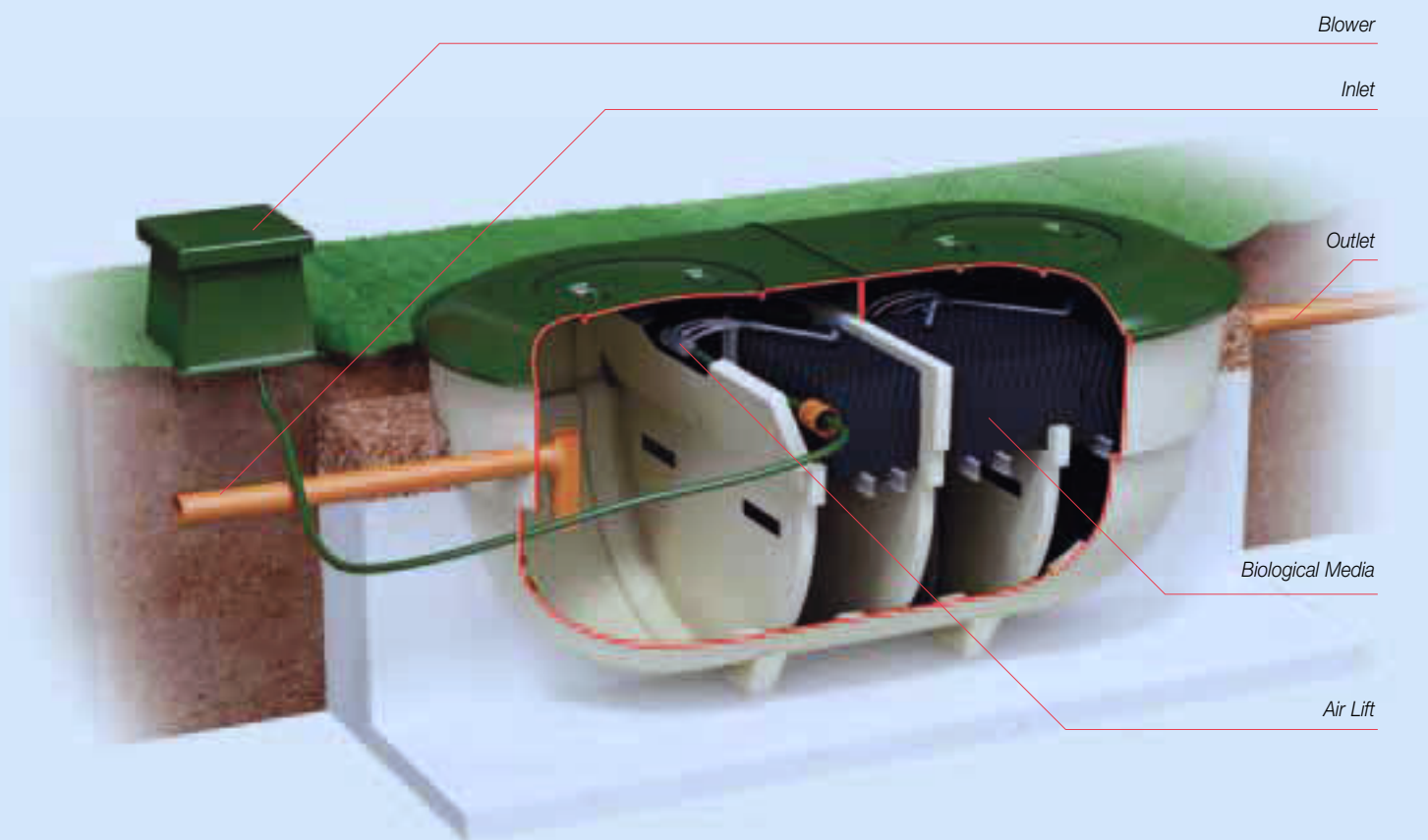


Inlet

Unit Size		P200	P250	P300	P375
Maximum number of full time residents		200	250	300	375
Maximum flow m ³ /day		40	50	60	75
BOD load kg/day		12	15	18	22.5
Weight empty (kg)	Primary settlement chamber	1000	1400	1400	1400
	Bio module	2200	2900	3500	4200
	Final settlement chamber	690	800	880	1100
Length (m)	Primary settlement chamber	5.090	7.740	7.740	7.740
	Bio module	6.900	7.500	8.100	9.900
	Final settlement chamber	4.320	5.090	6.190	6.190
Width (m)	Primary settlement chamber	2.820			
	Bio module	2.800			
	Final settlement chamber	2.820			
Depth (m)	Primary settlement chamber	3.715			
	Bio module	3.450			
	Final settlement chamber	4.460			

Weights are dry weights and installers must ensure there is no water in the tanks before lifting.
All weights are approximate. Kingspan Environmental reserve the right to alter the above dimensions without prior notice. For information on high rate units, please contact Kingspan Environmental.

BIOTEC™ P40-P150



System shown: P40-P55 only

Unit Size	P40	P55	P75	P100	P125	P150
Maximum number of full time residents	40	55	75	100	125	150
Maximum flow m ³ /day	8	11	15	20	25	30
BOD load kg/day	2.4	3.3	4.5	6.0	7.5	9.0
Weight - standard units empty (kg)	1250	1350	1500	1700	1800	2200
Length (m)	5.1	5.1	6.8	7.5	8.1	9.9
Width (m)	2.9	2.9	2.8	2.8	2.8	2.8
Depth - standard 1.0m invert units (m)	Dependent on invert		2.5	2.5	2.5	2.5

Maintenance

Kingspan Environmental sewage treatment plants are designed for minimum low cost maintenance. Kingspan Environmental offers a full inspection and after sales service involving planned maintenance visits. Under normal usage the plant will require periodic emptying to prevent excessive build up of surplus sludge.

Legal Requirements

Prior to installation, there is a legal requirement to obtain a Consent to Discharge from the relevant agency. Kingspan Environmental offer full assistance in this respect.

Kingspan Environmental Solutions



Commercial Sewage Treatment Plants



Large Capacity Pumping Stations



Stormwater Attenuation Systems



Residential & Commercial Rainwater Harvesting



Oil/Water Separators



Domestic Sewage Treatment Plants



Packaged Pump Systems



Reed Beds



Domestic Rainwater Harvesting



Garden Watering Systems



Septic Tanks



Below Ground Storage Tanks



Grease & Silt Traps

Sample Chambers

When a treatment plant discharges into a watercourse, it is a regulatory requirement to have a sampling point so that the effluent quality can be periodically checked by regulatory bodies. Available to suit all outlet depths of our standard ranges, a Kingspan Environmental sample chamber provides the solution, enabling both quick installation and easy access for accurate and convenient effluent testing.

Dispersal

Subject to the relevant authorities consent, the plant discharge can be to a watercourse or, provided the soil percolation test is satisfactory, to a ground soakaway.

Advice

The information in this sales literature is by necessity, brief. For further technical literature or assistance on sizing please contact Kingspan Environmental.

Accredited Installers

Strategically located throughout the UK, Kingspan Environmental Accredited Installers are appointed following rigorous selection procedures which assess their installation expertise, reputation and financial status.

These performance criteria, together with their design skills and knowledge of Kingspan Environmental products are also reviewed on an annual basis to ensure that the highest levels of professionalism are maintained.

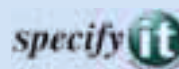
In keeping with Company policy of continuing research and development and in order to offer our clients the most advanced products, Kingspan Environmental reserves the right to alter specifications and drawings without prior notice.



Certificate No. FM11855



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