

Silverdale Parish Council

Response to Arnside Silverdale AONB DPD Consultation - 5th January 2017

Part 1 -- Provision for development

In our initial response in December 2015, we indicated that the site at Whinney Fold was unsuitable for development due to flooding and drainage issues. However, despite these comments part of the site has been included within the current document. We also indicated that the DPD should prioritise brownfield sites for development, an example of which is Kaye's nursery. This does not seem to have been done, and the Council would once again request that priority be given to brownfield sites before greenfield sites.

The site east of Hazelwood/St Johns Avenue has now been proffered for inclusion for development. This site would have immense visual impact from many parts of the area. Access is limited at present to a small lane serving Clarence House and Clarence Cottages, not wide enough for large vehicles, and a potential access from St Johns Avenue. There are already a great number of properties using vehicular access from St Johns Avenue onto Emesgate Lane causing parking/traffic problems, particularly when the school or church are in use. In addition we would suggest this would come under 'major' development and is not suitable for this village. The council would not wish to see this area of land included for future development.

Of necessity, because there are no mains Wastewater treatment facilities in the Village, nor according to United Utilities any plans within the foreseeable future for such, any development within Silverdale has to take into account the sensitive Wastewater drainage situation. When considering the requirements of the Urban Wastewater Treatment Regulations 1994, Silverdale Parish Council are of the opinion that in addition to the residents of the area, if account is taken of the number of static caravans/lodges, together with the significant touring caravan sites and the hotel / guest house and other accommodation, the total agglomeration of population-equivalent significantly exceeds the specified threshold of 2000. To illustrate the scale of the situation, the Westmorland Gazette, 5th January 2017 has a short quote from the owner of Holgates Caravan Parks stating that this Christmas / New Year it had had "**...more than 1000 guests....nearly doubling the population of 1,500**". It is therefore considered important the situation with regard to this Regulation is investigated and resolved before further new development in the area is agreed.

The Council welcome the revised policy AS12 regarding new caravan sites and extensions to existing ones and firmly support this. Traffic issues in Silverdale village already create problems and any further increase in traffic needs to be managed, an issue that County Highways seem unwilling to address at present.

Part 2 -- Comments regarding AS13 - Water quality, sewerage and sustainable drainage

The inclusion of a specific section on this subject is welcomed by the Council. It is however requested that the changes shown below are considered as suggested improvements to the detail of the policy in order to avoid doubt or ambiguity.

The use of the terms "Wastewater" and "Wastewater treatment systems" are considered important because they are now the Industry Standard terms throughout Europe. They also embrace all forms of treatment arrangement rather than just one type, which would be suggested by the use of the term "septic tank infrastructure". To help illustrate the point, currently in Silverdale, as with many other areas having private wastewater treatment arrangements, there will be examples of each of the following:

1. Simple discharge from the drain pipework straight to ground via a natural gap in the bedrock
2. Discharge into a "leaky" stone walled pit then straight to the ground
3. Discharge into a so called Cess Pit that then leaks straight to ground
4. Discharge into, then retention in a correctly functioning Cess Pit
5. Discharge into a Septic Tank that or may not leak, then discharge straight to ground
6. Discharge into a Septic Tank then to a soakaway pit in lieu of the required infiltration and secondary infiltration field
7. Discharge into a Septic Tank then to a correctly specified and installed infiltration and secondary treatment field
8. Discharge to a Package treatment plant then to a soakaway pit in lieu of the required infiltration and secondary treatment field
9. Discharge to a Package treatment plant then to a correctly specified and installed infiltration and secondary treatment field

Having researched the critical Standards and Specifications that apply at the moment, three have been listed rather than quoting just Building Regulations Section H2. This is considered important to avoid ambiguity. There is also a provision to require reference to any of the almost inevitable updates or supersessions to these that are likely to occur during the life of the DPD.

Suggested Revised text for policy AS13:

The Councils will support initiatives that rationalise or improve the provision of wastewater treatment in areas not connected to mains drainage, including installing new treatment works. ~~New development should avoid overloading existing septic tank infrastructure. Any development proposed to make use of already overloaded, leaking or out of date septic tank infrastructure will be required to make provision for appropriate upgrading of the infrastructure.~~

New development will be required to be connected to a suitable Wastewater treatment system meeting the latest versions of the following requirements and standards, or any superseding documents:

- i. Environment Agency - General Binding Rules*
- ii. BS 6297: 2007 + A1:2008 Code of practice for the design and installation of drainage fields for use in Wastewater treatment.*
- iii. Building Regulations Approved Document H, Section H2*

In order to avoid crossflows and the consequent risk of adverse impact on groundwater quality, Wastewater treatment systems will be required to be adequately separated, as specified in the above standards, from surrounding Wastewater treatment systems and also from surface water soakaway arrangements. The Wastewater System will also be required to have, and if it is a shared system retain, the capacity to accommodate without overload, the predicted flow from the new development.

In order to mitigate against adverse impacts on vulnerable groundwater in the AONB, a higher than average standard of Wastewater treatment is required. The following treatment is the necessary minimum standard and is enforceable by the Environment Agency:

- i. Full biological treatment in a certified proprietary Wastewater package treatment unit.*
- ii. Discharge to an associated ground infiltration or drainage field, constructed to the requirements of a) BS 6297: 2007 + A1:2008 Code of practice for the design and installation of drainage fields for use in wastewater treatment, and b) Buildings Regulations Approved Document H, Section H2.*

~~*For development that requires new septic tank infrastructure or the replacement or upgrade of a septic tank, a higher than average standard of sewage treatment is required to mitigate against impacts on the vulnerable groundwater in the area. In these circumstances, the following treatment is necessary and enforceable by the Environment Agency.*~~

- ~~*1) Full biological treatment in a proprietary unit.*~~
- ~~*2) Discharge to an associated soakaway or drainage field constructed to the requirements of section H2 of the Buildings Regulations.*~~

For new development in locations where there are vulnerable aquifers, applicants will need to provide an assessment that demonstrates that surface water and foul water will be kept out of the aquifer and how.

Proposals for new development should reflect the specific circumstances and Special Qualities of the AONB and relevant current evidence in relation to likely impacts on and potential benefits to water quality, Wastewater infrastructure and sustainable surface water drainage.