## Comments on Arnside Silverdale AONB DPD

## AS13 - Water quality, sewerage and sustainable drainage

## "New development should avoid overloading existing septic tank infrastructure"

All septic tank infrastructure in Silverdale have been constructed with the approval of Lancaster City Council or a predecessor authority. The vast majority does not perform satisfactorily and in fact most did not comply with building regulations at the time of their construction. Almost all must therefore come under the classification "overloaded, leaking or out-of-date" and therefore if any extra flow is proposed would require upgrading to the full requirements of the EA.

How is it proposed that "out-of-date" to be defined?

"For development that requires new septic tank infrastructure..." the (necessary and enforceable) requirements of the Environment Agency are

- (i) A proprietary package biological treatment plant
- (ii) Discharge to a soakaway or drainage field to Building regulations H2

Soakaways are only suitable for surface water discharges and should not be used for sewage effluent. The above reference to soakaway should be removed.

Drainage fields provide important secondary treatment to the effluent from a biological treatment plant. This helps ensure that ground water and the bay are not contaminated with partially treated sewage flowing rapidly through the limestone strata. The design requirements for drainage fields are set out in H2 and the plan area is dependent on the number of people served and the porosity of the ground. This plan area, which is significant, must not be built on or surfaced over and must be specified distances from buildings and other drainage fields or soakaways. It is probably impossible to develop most sites in Silverdale if these requirements are complied with.

It appears that the drainage arrangements for most recent and current developments do not meet these requirements. It is important that the situation is not worsened further by allowing non-compliant development until a satisfactory way of dealing with new sewage discharges is in place.

How would the Council deal with approving more complex proposals of a "specialist consultant" when recently approved developments do not comply with current requirements?



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