Northumberland National Park
Eastburn South Park
Hexham
Northumberland
NE46 1BS

Our ref: NA/2014/110949/01-L01
Your ref: 14NP0056

Date: 02 July 2014

Dear Sir/Madam

CHANGE OF USE FROM SINGLE DWELLINGS TO A PLACE OF WORSHIP AND BUDDHIST RETREAT CENTRE. GREENHAUGH HALL, GREENHAUGH, TARSET HEXHAM, NORTHUMBERLAND, NE48 1PP.

Thank you for referring the above application that was received on 12 June 2014.

Environment Agency Position – Disposal of Foul Sewage
We **object** to the proposed development as submitted because it involves the use of a non-mains foul drainage system but no assessment of the risks of pollution to the water environment has been provided by the applicant. We recommend that planning permission should be refused on this basis.

Reasons
The application form indicates that foul drainage is to be discharged to a non-mains drainage system. In these circumstances DETR Circular 03/99 advises that a full and detailed consideration be given to the environmental criteria listed in Annex A of the Circular in order to justify the use of non-mains drainage facilities. In this instance no such information has been submitted.

The application does not, therefore, provide a sufficient basis for an assessment to be made of the risks of pollution to the water environment arising from the proposed development.

We consider that, as a minimum, the planning application should contain the information requested on the non-mains drainage information form, a copy of which has been sent to the applicant/agent. This form should be completed and returned to the Local Planning Authority. It should be noted that this form only requests sufficient information to enable us to formulate an opinion on our particular area of concern, being pollution prevention. As the Local Planning Authority you may wish to request additional information to address amenity and public health issues, as set out in DETR Circular 3/99.

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Advice to Applicant
Under the terms of the Environmental Permitting Regulations (England and Wales) 2010, anyone intending to discharge volumes of sewage effluent of 5 cubic metres per day or less to surface waters or 2 cubic metres per day or less to ground may be eligible for an exemption. We are currently working with Defra to review our approach to regulating these small sewage discharges. Whilst this review is underway we will not require registration of small sewage discharges in England under an exemption as previously required, as long as you comply with the conditions set out in our Regulatory Position Statement. This is available on our website at:
http://www.environment-agency.gov.uk/homeandleisure/118753.aspx.

Please note that we will retain the existing system so that anyone can still register if they wish to. This might be, for example, as part of a house sale.

An Environmental Permit from the Agency is normally required for discharges above this volume or to sensitive locations. It is illegal to discharge sewage effluent in sensitive locations, or discharge over 5 cubic metres per day to surface waters or 2 cubic metres per day to ground, without an Environmental Permit.

Further guidance on Environmental Permitting requirements is available on our website at:
http://www.environment-agency.gov.uk/business/topics/water/32038.aspx

With regards to design, the site must be drained by a separate system of foul and surface water drainage, with all clean roof and surface water being kept separate from foul water.

If the matter of non-mains drainage can be resolved and you are minded to grant consent, then the following matters should also be taken into consideration:

Permitting Regulations – Advice for Applicant
Generally biomass boilers do not need a licence or permit, unless the input is between 20-50MWth where a licence is required from the Local Authority. However a biomass boiler with a rated input greater than greater than 50MWth will require a permit from the Environment Agency under the Integrated Pollution Prevention & Control (IPPC) Regulations. Please refer to table below.

Boilers burning waste wood as a fuel may also require a permit or an EPR exemption depending upon the particular circumstances. Boilers to be operated in Smoke Control Areas must be listed on the Exempt Appliances List; otherwise permission will be required from the Local Authority.

The Biomass System Feasibility Guide, available on the BEC website, contains a flowchart showing a series of questions to establish what permissions are likely to be require

Please find below some useful websites:
www.**biomassenergycentre**.org.uk/

Biomass.Centre@forestry.gsi.gov.uk

http://smokecontrol.defra.gov.uk/
Below is a summary table that can be found on most Local Authority website:

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Summary of pollution control legislation applicable to the operation of biomass boilers

Fuel	Plant Size	Pollution Control Regime	Regulator
Biomass fuel arising from natural sources	< 20 MWth	Clean Air Act	Local Authority
	>50 MWth	IPPC	Env Agency
	20-50 MWth	LA-PPC	Local Authority
Waste or waste derived biomass, exempt from WID	<0.4-3 MWth and < 50 kg/hr	Clean Air Act	Local Authority
	0.4 - 3 MWth and 50 - 1000 kg/hr	LA-PPC	Local Authority
	> 3 MWth and >1000 kg/hr	IPPC	Env Agency
	> 50 MWth	IPPC	Environment Agency
Waste or waste derived biomass to which WID applied	< 3 MWth	WID, LA-IPPC	Local Authority
	> 3 MWth	WID, IPPC	Env Agency

MW = megawatt, thermal.
LA-PPC = Local Authority Pollution Prevention and Control.
IPPC = Integrated Pollution Prevention and Control (Environment Agency).
WID = Waste Incineration Directive (Local Authority and Environment Agency)

Surface Water Disposal
The Environment Agency recommend visiting http://www.environment-agency.gov.uk/research/planning/82584.aspx. for standing advice regarding general surface water drainage issues.

Charging for Planning Advice
The Environment Agency began charging for the planning advice we provide to developers and their consultants on 3 March 2014.

We will continue to provide a free service to developers and their consultants in the form of a preliminary opinion. The above information constitutes our preliminary opinion which outlines our position and highlights any environmental issues we are concerned about as a statutory consultee. Should you require any further bespoke advice, we can provide this at a chargeable rate. Our charge will be £84 per hour and we do not charge VAT

Further information can be found on our website at http://www.environment-agency.gov.uk/research/planning/33580.asp

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I have sent a copy of this letter to the agent/applicant and a copy of the subsequent decision notice would be appreciated.

Yours faithfully

Susan Davison
Planning Officer - Sustainable Places Team

Direct dial [redacted]
Direct fax [redacted]
Direct e-mail [redacted]

cc Kevin Doonan Architect

Foul Drainage Assessment Form
(FDA1)

Please note: this form should be used for planning related queries only and cannot be used when applying for an Environmental Permit.

APPLICANT DETAILS
Name : Land of Joy
Address : c/o 27 Hollin Drive, Leeds, LS16 5NE
Telephone No/e-mail : [redacted]

This form should be used in order to establish whether non-mains drainage, either a new system or connection to an existing system, would be acceptable, your answers to the following questions will be taken into consideration. It is important that you provide full and accurate information. Failure to do this will delay the processing of your application.

You must provide evidence that a connection to the public sewer is not feasible. Other than very exceptionally, providing non-mains drainage as part of your Planning or Building Regulation application will not be allowed unless you can prove that a connection to the public sewer is not feasible. Non-mains drainage systems are not considered environmentally acceptable in publicly sewered areas. Please note that the existence of capacity or other operating problems with the public sewer are not valid reason for non-connection where this is reasonable in other respects.

Where connection to the public sewer is feasible, agreements may need to be obtained either from owners of land over which the drainage will run or the owners of the private drain.
Government guidance contained within DETR Circular 03/99/ WO 10/99 'Planning requirements in respect of the use of non-mains sewerage incorporating septic tanks in new development' gives a hierarchy of drainage options that must be considered and discounted in the following order:

1 Connection to the public sewer
2 Package sewage treatment plant (which can be offered to the Sewerage Undertaker for adoption)
3 Septic Tank
4 If none of the above are feasible a cesspool

You must respond to all the following questions, if you wish to submit additional information please do so, marked clearly "Additional Information". **In some cases you will be required to provide a further assessment in accordance with the requirements of DETR Circular 03/99/ WO 10/99 (see Guidance Note 1).**

Mains connection	**YES**	**NO**

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Have you provided a written explanation of why connection to the mains sewer is impractical with this form?. *This should include a scaled map showing the nearest mains connection point - check with your local sewerage undertaker.*	Yes	

Non-mains connection

Please provide a plan with dimensions that clearly shows the location of the whole system in relation to the proposed development and the position of the key elements e.g. septic tank, drainage fields and points of discharge.

1. Existing system	**YES**	**NO**
Do you intend to use an existing non-mains foul drainage system?	Yes	
If YES, does the system already have an Environmental Permit issued by the Environment Agency? *(In the case of a cesspool write N/A) Please provide Permit reference number……*	Not known	

2. Discharge	**YES**	**NO**
Do you propose to use a cesspool? *If yes go to Q4*		No
Do you intend to use a system that discharges solely to watercourse? *(see Guidance Note 2) If yes go to Q8.*	Yes	
Alternatively, will all, or any part of, the discharge go to soakaway*? (see Guidance Note 2)* - this would include systems that combine a soakaway with a high level overflow to watercourse? *If yes go to Q3.*		No
Have you considered having your system adopted by the sewerage undertaker? *(See Guidance Note 6).*		No

3. Water abstraction	**YES**	**NO**
Do you receive your water from the public mains supply? *If yes go to Q5*	Yes	
If not, where do you get your water supply from? **PRIVATE SPRING**		
4. Cesspools *(For methods other than cesspools write N/A)*	**YES**	**NO**

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Have you provided written justification for the use of a cesspool in preference to more sustainable methods of foul drainage disposal? *(see Guidance Note 3)*		

5. Ground Conditions *(For cesspools write N/A)*	**YES**	**NO**
Have you submitted a copy of the percolation test results with this form *(see Guidance Note 4)?* If NO please explain the justification for not undertaking or submitting these tests.		
Is any part of the system in land which is marshy, water logged or subject to flooding?		
Will the soakaway be located on artificially raised, made-up ground or ground likely to be contaminated? *If yes please provide details as additional information.*		
Have you submitted the results of a trial hole at the site to establish that the proposed drainage field will be above any standing groundwater *(see Guidance Note 5)?*		

6. Available Land	**YES**	**NO**
Is the application site plus any available area for a soakaway less than 0.025 hectares (250m^2)?		

7. Siting of drainage field/soakaway discharge from a septic tank or package treatment plant or other secondary treatment.. *You may need to make local enquiries to get a full answer to these questions*.	**YES**	**NO**
Will it be at least **10m** from a watercourse, permeable drain or land drain?		
Will it be at least **50m** from any point of abstraction from the ground for a drinking water supply (e.g. well, borehole or spring)? *This includes your own or a neighbour's supply.*		
Are there any drainage fields/soakaways within **50m**? *This includes any foul* *drainage discharge system (other than the subject of this application) on either your* *own or a neighbour's property..*		
Will it be at least **15m** from any building?		
Will there be any water supply pipes or underground services within the disposal system, Other than those required by the system? *(For cesspools write N/A)*		
Will there be any access roads, driveways or paved areas within the disposal area? *(For cesspools write N/A)*		

8. Siting of treatment plant, septic tank or cesspool	**YES**	**NO**

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Is it at least **7m** from the habitable part of a building?	Yes	
Will there be vehicular access for emptying within **30m?**	Yes	
Can the plant, tank or cesspool be maintained or emptied without the contents being taken Through a dwelling or place of work?	Yes	

9. Expected flow

Please estimate the total flow in litres per day *(see Guidance Note 4).*	5000lts/day

10. Maintenance

How do you propose to maintain the system? Arrange for a maintenance contract with a local specialist, eg. Hutchinson Drainage.

Declaration
I declare that the above information is factually correct.

Name	**Signature**	**Date**
Kevin Doonan	[redacted]	18 July 2014

GUIDANCE NOTES:

1) This form is for use with ***DETR Circular 03/99 (WO Circular 10/99) 'Planning Requirements in Respect of the Use of Non-Mains Sewerage Incorporating Septic Tanks in New Development'*** *(the Circular).* It is intended to help Local Planning Authorities establish basic information about your system and decide whether you need to submit a more detailed site assessment in accordance with Annex A of the Circular. If a detailed site assessment is requested but not submitted, your planning application might be refused.

2) In addition to Planning Permission and Building Regulation approval y**ou may also require an Environmental Permit from the Environment Agency. Please note that the granting of Planning Permission or Building Regulation approval does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form the Agency will carry out investigations It can take up to 4 months before the Agency is in a position to grant a permit or not**.

3) The use of cesspools is an option of last resort as set out in the non-mains drainage hierarchy of preference in DETR Circular 03/99/WO 10/99. This is echoed in the Building Regulations 2000 (approved document part H). The Circular notes at Annex A paragraph 8 that cesspools give rise to environmental, amenity and public health problems as a result of *"frequent overflows due to poor maintenance, irregular emptying, lack of suitable access for emptying and even through inadequate capacity."* In addition to this the requirement for frequent emptying is usually by contractor involving road transport with associated environmental costs. For these reasons, the use of cesspools cannot be considered a long-term foul sewage disposal solution. In view of the environmental risks associated with their use, any proposal to use cesspools must be fully justified to the Local Planning Authority

4) Typical flows

Property	Litres per person per day		Property	Litres per person per day
Domestic*	180		Offices	55
Hotels, B&Bs	200		Factories	65
Restaurants	25		Public Houses	15
Campsites	75		Caravans	120
Dayschool	50		Rest Homes	300
Boarding School	180		Hospitals	450

*Generally calculated on 1 person per bedroom 0.5 person per household.

5) You should refer to **DTLR Building Regulations 2000 Section H2 Waste Water Treatment and Cesspools** with regard to the general requirements for construction of non mains sewerage systems. **Sections 1.33 to 1.38** deal with the test requirements for trial holes and percolation tests and for convenience the text of these sections is repeated below:

1.33 A trial hole should be dug to determine the position of the standing ground

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water table. The trial hole should be a minimum of 1m^2 in area and 2m deep, or a minimum of 1.5m below the invert of the proposed drainage field pipework. The ground water table should not rise to within 1m of the invert level of the proposed effluent distribution pipes. If the test is carried out in summer, the likely winter groundwater levels should be considered. A percolation test should then be carried out to assess the further suitability of the proposed area.

1.34 Percolation test method – A hole 300mm square should be excavated to a depth of 300mm below the proposed invert level of the effluent distribution pipe. Where deep drains are necessary the hole should conform to this shape at the bottom, but may be enlarged above the 300mm level to enable safe excavation to be carried out. Where deep excavations are necessary a modified test procedure may be adopted using a 300mm earth auger. Bore the test hole vertically to the appropriate depth taking care to remove all loose debris.

1.35 Fill the 300mm square section of the hole to a depth of at least 300mm with water and allow it to seep away overnight.

1.36 Next day, refill the test section with water to a depth of at least 300mm and observe the time, in seconds, for the water to seep away from 75% full to 25% full level (i.e. a depth of 150mm). Divide this time by 150mm. The answer gives the average time in seconds (Vp) required for the water to drop 1mm.

1.37 The test should be carried out at least three times with at least two trial holes. The average figure from the tests should be taken. The test should not be carried out during abnormal weather conditions such as heavy rain, severe frost or drought.

1.38 Drainage field disposal should only be used when percolation tests indicate average values of Vp of between 12 and 100 and the preliminary site assessment report and hole tests have been favourable. This minimum value ensures that untreated effluent cannot percolate too rapidly into groundwater. Where Vp is outside these limits effective treatment is unlikely to take place in a drainage field. However, provided that an alternative form of secondary treatment is provided to treat the effluent from the septic tanks, it may still be possible to discharge the treated effluent to a soakaway.

6) Developers may requisition a sewer from the Sewerage Undertaker to connect their development to the public sewer. Should this not be feasible on the grounds of cost and practicability, on site treatment in the form of package plants and their associated sewers (If constructed to an acceptable standard) can be offered to the sewerage undertaker for adoption. This approach is in support of advice from the Government described in DETR Circular 3/99 and WO 10/99. Developers are urged to discuss their requirements with the Sewerage Undertaker at the earliest possible opportunity.

7) Glossary

Package treatment plant

A package treatment plant is a system which offers varying degrees of biological sewage treatment and involves the production of an effluent which will be disposed of to ground via a soakaway or direct to a watercourse. There are many varieties of package plant but all involve settling the solids before and/or after a biological treatment stage and all use electricity. Package treatment plants usually treat sewage to a higher standard than septic tanks but are vulnerable in the event of power failures. This may make their use inappropriate in some circumstances e.g. holiday accommodation where occupation and maintenance are irregular.

Septic tank

A septic tank is a two or three chamber system, which retains sewage from a property for sufficient time to allow the solids to form into sludge at the base of the tank, where it is partially broken down. The remaining liquid in the tank then drains from the tank by

means of an outlet pipe.

Effluent from a septic tank is normally disposed of by soakage into the ground, provided that the disposal does not generate a pollution risk to surface waters or groundwater resources (underground water). The most commonly used form of soakaway is a subsurface irrigation area, comprising a herringbone pattern of land drains laid in shallow, shingle filled trenches. The soakaway drains should be located at as shallow a depth as possible, usually within 1 metre of the ground surface

Cesspool
A cesspool is a covered watertight tank used for receiving and storing sewage and has no outlet. It relies on road transport for the removal of raw sewage and is therefore the least sustainable option for sewage disposal. Because of this, a cesspool is best regarded as a temporary measure pending a more satisfactory solution, such as the provision of mains drainage. It is essential that a cesspool is, and remains, impervious to the ingress of groundwater or surface water and has no leaks.