

From: Driver, Jonathan

Sent: 16 March 2022 19:27

To: Eaves, David

Subject: RE: APP/21/00200 Pfizer New Ln. - Disch. c.14, c.15, c.16 - Means of Wastewater Disposal, Network Detail & Maintenance. EH Comments

David,

I've reviewed the drainage related submissions. I'm not clear why the documents were so divided into so many individual files – this seems to have lost a couple of pages and two appendices from the Flood Risk Assessment. I've reviewed the FRA, Drainage Strategy, and the P13 revision of the Drainage Strategy Plan.

I note that c.16 is a compliance condition that doesn't actually specify the document version, so this one may not actually require discharge (if we accept that changes to the specified doc [without a version qualifier] do not require separate approval under this condition. V.08 is listed on the decision notice. The latest version does include some changes, as indicated in my earlier email (and the version notes at the head of the document, namely the removal of tertiary treatment).

I might interpret c.14 as concerning the disposal destination for surface water & foul wastewater, given it's use of the language 'means of... disposal', and 'in consultation with Southern Water. c.16 probably concerns the adequacy of the site internal network.

On that assumption, I'd highlight just a couple of point Re: c.16;

- Section 3.4 describes the interceptor units specifically as petrol interceptors, to prevent potential contaminants 'in the form of hydrocarbons from oil spillages' – in principle excluding the attenuation of suspended solids &/or DNAPL. In practice, most petrol interceptors are combined / multi-pollutant attenuators, but the strategy does not provide details of the interceptors, e.g. manufacturer, model, or specification / capacity of the units.
- Section 3.9.3 refers to a catchpit manhole upstream of each cellular attenuation tank, which will capture suspended solids (TSS), but C200810-PIN-XX-XX-DR-C-00205 P13 doesn't identify any catchpit chambers, and the South/West Catchment bypasses both of the specified tanks.
- It would appear that inputs from rainwater downpipes associated with the MSVP structure (south / west catchment), and warehouse roof/van loading canopy (north catchment) are not segregated from the flows being directed to the petrol interceptors. Best practice is to separate flows, to ensure maximum capture efficiency – it is not unacceptable for an interceptor unit to manage a combined flow, but the unit capacity / specification will need to account for the additional flow volume. In line with the first point above, it is not clear from the strategy that appropriate units have been / will be specified.
- The removal of the Quadraceptor tertiary treatment units might justify seeking assurance that the petrol interceptor units (as a primary pollutant attenuation measure) will be adequate.
- 3.9.3 also includes reference to a perforated / slotted '*distribution*' pipe, providing filtration / treatment – It is assumed from C200810-PIN-XX-XX-DR-C-00205 P13 that the permeable surface collection system is to be a tanked/sealed system, and 3.9.3 meaning '*collection*' and not '*distribution*' – but development management may wish to confirm this.

Re: c.15;

- I note that 3.9.3 includes a maintenance table directly reproduced from SuDS Manual - by definition in line with guidance

- 3.9.4 & 3.9.5 similarly reproduce SuDS manual recommendations, but refer to 'guidance' and 'typical maintenance schedule' – it is unclear that listing the v.11 drainage strategy as an approved document would actually secure maintenance in line with the tables presented (in principle, might not be enforceable, and so might not be adequate to demonstrate that c.15 has been met)
- 3.9.5 refers to proprietary systems. I am unclear as to which elements of drainage infrastructure this section refers to, given that 3.9.2 refers specifically to oil separators / petrol interceptors, and no other proprietary treatment is proposed.

Disposal destination for public surfacewater sewer is the River Lavant, which is why the pollution control measures are relevant to DM10. The above points might sustain an objection on grounds of insufficient detail against this policy – but ultimately it's a planning call. I note the positive responses of other consultees. Arguably the observations above are technical points, and we can assume appropriate specification of units, but I'm not sure if we'll have appropriately discharged our duties as the LPA if we don't seek to secure sufficient detail; I'm flagging for your information and action as you see fit.

Note, the distinction above between the scope of c.14 relative to c.16 is relevant as it is c.14 which carries the Grampian style clause, so we could seek additional assurances without impacting the build schedule, by using the suggested interpretation.

Best Regards,

Jonathan Driver
Environmental Control Officer

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From: Eaves, David

Sent: 16 March 2022 09:44

To: Driver, Jonathan

Subject: RE: APP/21/00200 Pfizer New Ln. - Disch. c.17 - Piling Details / Risk Assessment. EH Comments

Hi Jonathan

Many thanks for your consultation response on Conditions 11 and 17 please can you confirm whether you are anticipating making comments on any of the other conditions in for discharge (i.e. 14, 15), I'm not expecting you to comment but wanted to check.

Many thanks

David