

UPPER DEVERILLS: PROPOSED NEW SEWAGE TREATMENT WORKS (STW)
AT SITE OFF B3095 AT MONKTON DEVERILL (GRID REFERENCE 385265 – 137135)
FOR WESSEX WATER SERVICES LIMITED
(Application No. W.05.09005)

Purpose of Report

1. To comment on the application and to recommend that planning permission be granted subject to conditions.

Background

2. Wessex Water is seeking planning permission to construct a package submerged aerated filter (SAF) plant in a field adjacent to the B3095 on the southern outskirts of Monkton Deverill. The main objective of the scheme is to comply with a revised discharge consent issued by the Environment Agency and to install secondary treatment to meet the requirements of the Urban Waste Water Treatment Directive (UWWTD).

The Site

3. The proposed new package SAF plant would be situated in a greenfield site on the southern outskirts of Monkton Deverill accessed from the B3095 (see **Appendix 1**).
4. In addition to proposed development works would be carried out under permitted development rights to install a new submersible sewage pumping station at an existing site in the centre of the village. Sewage from this site would be pumped to the proposed new plant for treatment.
5. The proposed new site would occupy an area of 0.09 hectares and access would be gained by constructing a new access road along the inside of the roadside hedge and exiting onto an existing bridleway.

The Application

6. The development proposed for which planning permission is requested is as follows:-
 - Below ground Balancing Tank 3.5m diameter.
 - Walk in kiosk incorporating Blower Enclosure and MCC (Motor Control Centre) 4.0m x 3.0m x 2.6m high finished in green glass-reinforced plastic (GRP).
 - SAF Treatment Plant (below ground with raised covers 0.4m high).
 - Access Road, 3.5m wide (Type 1 sub-base with Rolled Scalping Surface and Tanalised Timber Edging).
 - 2 No. Lighting Columns (4m high) and 4 No. Bollards (0.9m high).
 - Inlet Chamber 5.0m x 0.8m x 0.5m high.

7. A new headwall would be constructed at the location of the proposed outfall to the River Wylfe and the whole operational site compound would be surrounded by a 2.1m high chain-link security fence within site boundary screening vegetation. The proposed access road would use the existing entrance to a bridleway (B3095) and then branch off east north-eastwards to the site (see **Appendix 2**).

Planning Policy

8. Policies 1, 2, 5, 6 and 24 of the Wiltshire and Swindon Waste Local Plan Draft for Adoption – January 2005 are considered relevant for this application. Policies 1, 2, 5 and 6 relate to general policies and Policy 24 to the development of waste water treatment facilities.
9. The West Wiltshire District Plan 1st Alteration, June 2004 is also considered relevant because it contains policies relating to Countryside Protection (C1) Areas of Outstanding Natural Beauty (ANOB) (C2) and Landscaping (C32) (see **Appendix 3**).

Consultations

10. **West Wiltshire District Council** – No objections.
11. **West Wiltshire District Council Environmental Health Officer** – No objection although suggests amended construction hours.
12. **Upper Deverills Parish Council** – Objects to the proposals on a number of grounds. The objections are summarised in the following:-
 - (i) An alternative better site exists and should be developed.
 - (ii) Development in the AONB should have regard to the impact on the landscape.
 - (iii) The development will have an impact on ecology, particularly water voles alongside the River Wylfe.
 - (iv) The river/watercourses will be affected and there would be harm to the landscape and to nature conservation interests.
 - (v) The proposed site is of archaeological importance.
 - (vi) New development in conservation areas will only be permitted if views into, out of and within areas which are important are protected.
 - (vii) Lack of consultation by Wessex Water on the proposals (Wessex Water have apologised).
 - (viii) Environment is not being protected.
 - (ix) Planning should be protecting and improving the natural environment.
 - (x) Need to limit adverse impacts on light pollution.
 - (xi) Noise will be a problem.
 - (xii) Odour likely to be a problem.
 - (xiii) Lip service is being paid to environmental factors.
 - (xiv) Parish Council will totally support a different option (Monkton Barn).
13. The overall view of the Parish Council is that a better alternative exists which far outweighs any benefits of the option being considered under the current planning application. (However, there is no planning application being considered for an alternative option and therefore the current application has to be considered on its planning merits).

14. **Environment Agency** – No objections. The proposal offers a significant improvement on existing conditions as it will eliminate an unsatisfactory discharge of septic tank effluent to the River Wylfe at Monkton Deverill.
15. **English Nature** – No objections. The aim of the scheme is to improve discharge quality.
16. **County Archaeologist** – No objections subject to a condition being imposed to ensure the implementation of a programme of archaeological works agreed beforehand.
17. **Highways Development Control** – No objections subject to conditions.
18. **Rights of Way** – No objections.
19. **Countryside**
 - **Ecology** – No objections subject to conditions regarding submission of a Construction Method Statement (CMS) and Risk Assessment (RA).
 - **Landscape** – No objections subject to conditions re planting and protection of existing hedges and trees.

Publicity

20. The application was advertised in the local press, by site notice and neighbour notification of the nearest resident. Thirteen letters of representation have been received from local residents, including one from a West Wiltshire District Councillor (Councillor Mounde). The concerns raised in the letters can be summarised as follows:-
 - (i) A more appropriate alternative site exists.
 - (ii) The proposal will generate noise 24 hours a day, 365 days a year.
 - (iii) It may produce an odour when sludge is removed once a month.
 - (iv) It will cause light pollution from the 4m high masts and halogen lamps.
 - (v) The site is closer to houses in Kingston Deverill who will derive no benefit from the proposals.
 - (vi) It is proposed to be constructed right next to an extremely dangerous stretch of the B3095.
 - (vii) The 'black top' entrance driveway will be used for temporary parking and turning adding to the existing road safety problem.
 - (viii) The field where the plant is to be constructed contains an archaeological site of interest.
 - (ix) Site should be installed well away from Monkton Deverill and Kingston Deverill dwellings. The nearest house is 125 metres away.
 - (x) Other sites have been rejected.

- (xi) Proposed site lies prominently in a designated AONB.
 - (xii) It is proposed to surround the site with a 2.1 metre chain-link fence.
 - (xiii) Construction works and extra traffic will cause disturbing noise.
 - (xiv) Likelihood of extension in future years.
 - (xv) It is inappropriate to have development which amounts to 'infill' development of an industrial nature (i.e. ribbon development).
 - (xvi) Proposed kiosk and lighting will be visually intrusive.
 - (xvii) It will lead to two discharges close to one another (proposed new site and the West Wilts Housing Association existing sewage plant).
 - (xviii) Visual, noise, odour and light pollution.
21. All the above consultation responses and the letters of objection are available for inspection in the **Members' Room**.

Planning Considerations

22. The application must be determined in accordance with the relevant policies of the Development Plan unless material considerations indicate otherwise. The main issues to be considered are:-
- The need for the proposal.
 - Policy Considerations.
 - Environmental implications of the development.

The Need for the Proposal

23. With regard to the need for the proposal being applied for, at present a Wessex Water septic tank located in Monkton Deverill village, adjacent to the River Wylfe, receives crude effluent from some 20 houses. The effluent from these houses is discharged directly into the river after only primary treatment (i.e. settlement and screening). In order to meet the requirements of the UWWTD, the discharge into the Wylfe must comply with revised consent requirements, hence the proposed plant being considered. The more stringent discharge consent will result in an overall water quality gain for this particular stretch of the River Wylfe.

Policy Considerations

24. Policy 24 of the Wiltshire and Swindon Waste Local Plan Draft for Adoption – January 2005 states that:-

“The Waste Planning Authority (WPA) will permit the development and extension of existing sites for waste water treatment provided the applications comply with Policies 1, 2 and 5-10 of this Plan.

The WPA will permit the development of new greenfield sites for waste water treatment facilities where the application demonstrates to the satisfaction of the WPA that the proposal:-

- (a) Cannot feasibly be carried out within the capacity of existing sites and buildings;
- (b) Cannot feasibly be carried out on previously developed land;
- (c) Cannot be accommodated as an extension to existing sites;
- (d) Complies with Policies 1, 2 and 5-10 of this Plan.”

25. The proposed development would constitute a new greenfield site. There exists in Monkton Deverill at the present time two operational sites which process sewage. One is owned by Wessex Water and the other is owned by West Wilts Housing Association. These were ruled out for extension on the grounds of their close proximity to housing. The site owned by Wessex Water is the existing below ground septic tank which is overlooked by residential properties and has limited vehicular access and is restricted in size. The other site is the existing sewage treatment works run by West Wilts Housing Association which serves the housing association houses. This site was considered to be ecologically sensitive because it lies within the River Wylfe County Wildlife Site and is also overlooked by five or six residential properties on the opposite side of the road. On the grounds of (a), (b) and (c) of Policy 24, it was considered more beneficial to look for a greenfield site, subject to complying with Policies 1, 2 and 5-10 of the Waste Local Plan.
26. Policy 1 of the Wiltshire and Swindon Waste Local Plan Draft for Adoption – January 2005 concerns the need for planning applications to provide the Best Practicable Environmental Option (BPEO). The requirements listed include:-
- Contribution to an adequate and integrated network of waste management facilities;
 - Minimise the distance waste has to be transported; and
 - The protection and enhancement of the environmental, economic, social and community assets.
27. It is considered that the proposed development of a new STW at Monkton Deverill on the site proposed accords with these requirements and therefore provides the BPEO and conforms with Policy 1.
28. Policy 2 considers the demonstrated need for the proposal. It has been established at the outset that there is a need to provide improved treatment for effluent which is currently being discharged into the River Wylfe. The requirements of the UWWTD dictate an improvement for the current discharge which has led to the submission of the current application. It is possible that in future those houses connected to the existing West Wilts Housing Association Sewage Treatment Works could be connected to the new plant, thus ensuring a better quality discharge all round to the River Wylfe. In addition to fulfilling a need, the proposed site is also close to the proposed point of discharge and thus conforms with the proximity principle.

29. The proposed development is not within a safeguarded preferred area as mentioned in Policy 5 which seeks to safeguard preferred areas and existing waste sites where they are appropriate for continued use.

Environmental Implications of the Development

30. Policy 6 considers a range of potential environmental impacts which can arise from waste related proposals. With regard to the development proposed, the main impacts which have been raised through the letters of representation received are considered to be as follows:-

- (i) Ecology
- (ii) Visual Impact/Landscape
- (iii) Light Pollution
- (iv) Security Fencing
- (v) Surfacing of Access Point
- (vi) Noise
- (vii) Traffic
- (viii) Odour
- (ix) Archaeology

(i) **Ecology**

31. Concerns have been raised in some of the letters received relating to the impact on ecology, both in terms of the proposed site and the outfall point into the River Wylfe.
32. With regard to the actual site for the plant itself, this is located in the corner of an improved pastoral field with primarily perennial rye grass and clover. The site is bounded to the east by a post and wire fence and to the north by large, intact but species-poor hedgerow. Ecologically, the site is of little or no nature conservation value and this view is confirmed by the County Ecologist and by English Nature.
33. In order to gain access to the site there would be a need to remove a small section of hedgerow. However, this would be conditioned to be removed outside the bird breeding season. The County Ecologist is supportive of the fact that the hedgerow to the north of the site would be tunnelled beneath rather than removed to accommodate the gravity and rising main.
34. It is proposed to construct an outfall into the River Wylfe to the north of the site. At the present time the exact location of this outfall has not been decided. However, in order to safeguard any water vole usage of this area the County Ecologist has recommended that a survey be carried out prior to the construction of the outfall to determine whether any mitigation is required. This would be required by condition.

(ii) **Visual Impact/Landscape**

35. The proposed application site lies within the Cranbourne Chase AONB and therefore planning restrictions exist to control the development which takes place. The location of the site has been the subject of much concern from local residents as reflected in the letters of objection to the proposal. Concerns have been raised that the site would bring an industrial feature into a rural landscape and could lead to the establishment of “ribbon development” which would fill the rural gap between Monkton Deverill and Kingston Deverill to the south. Many of the letters refer to an alternative location which has less of an environmental impact than the option chosen. The point has to be made that although it is always desirable to hide a development such as a sewage treatment works completely out of site, (and to some extent out of mind), the practicalities of the situation are that it is not always possible to do this or it is often not sustainable. The site chosen is close to the B3095 and is screened from traffic by existing high hedge to the north. The boundary of the STW would be planted with woodland edge species on the three remaining exposed sides (away from the existing hedge) to provide screening for riders and ramblers using the bridlepath or other rights of way. In addition, planting would be carried out along the southern edge of the new access road to screen the views from the higher land to the south. In total, some 150 metres of planting would be carried out to screen the plant site and access road.
36. The County Landscape Officer has considered the proposed planting scheme (which is a mix of standard trees and hedgerow planting) in terms of landscape mitigation and is acceptable subject to conditions regarding implementation of the scheme, retention of existing trees and hedgerows and protection requirements.
37. Considering the impact of the plant itself, concerns have been raised by local residents regarding the impact of the proposed plant. The highest structure would be a walk-in kiosk, 2.6 metres high, finished in green GRP (glass-reinforced plastic). Most of the plant is either below or slightly above ground level. It is not therefore considered that the plant will have a significant impact on the AONB or on the nearest residential properties which are some 100 metres away from the proposed site to the south-west and north-east. Their views would be restricted by replanting the hedge for the property to the south-west and by extra hedges for the property to the north-east on the edge of Monkton Deverill.

(iii) **Light Pollution**

38. One aspect of the existing proposals which has caused great concern among local residents is that of the two lighting columns 4 metres high with two halogen lights. The concern is that these will bring light pollution to the area and have an adverse impact on it.
39. The matter of light pollution has been taken up with the applicant who has confirmed that the lights would only be operational when there was a need to visit the site during the hours of darkness. In addition, the applicant has agreed that the lights could be mounted on the side of the proposed kiosk (2.6 metre high) to reduce the potential visual intrusion and impact on the area. This would be required by condition so there would be no requirement for the 4 metre high poles.

(iv) **Security Fencing**

40. Concerns have been raised regarding the 2.1 metre high chain-link security fence which will enclose the plant site on three sides. The concern is that this will be an alien feature in an AONB and that a more sympathetic means of enclosure should be considered.
41. The applicant has agreed to consider an alternative post and rail type fence which would be more appropriate given the rural setting within an AONB. This would be required by condition. It does mean, however, that the applicant would have to consider alternative means of making the plant within this site safe and secure to deter potential vandalism.

(v) **Surfacing of Access Point**

42. Concerns have been raised by local people that it is inappropriate to have a black tarmac surface within an AONB at the entrance to a bridleway. The applicant is prepared to change the tarmac area at the entrance to concrete. Although the remainder of the access road would be rolled scalpings with timber edgings, the access point has to be robust to accommodate a six wheeled tanker which would be used to remove sludge from the STW. The plant site itself would be a combination of concrete, gravel and grass. Overall, it is considered a concrete access point is more sympathetic to the rural setting and will be pursued through a condition.

(vi) **Noise**

43. Concerns have been raised by the local people that the plant would be noisy during day and night time hours. The proposed STW would be located to the west of Monkton Deverill and away from the majority of the houses. However, noise levels in and around Monkton Deverill itself are low because there are no significant noise sources to raise overall levels. The only possible noise sources are the traffic on the B3095 road and the water flow in the River Wylye.
44. The main source of noise from the STW would be the blowers which would operate on a 24 hour basis and which would be attenuated to 65 dB(A). Given attenuation of noise through distance, the proposed plant is expected to give rise to the following levels at the nearest sensitive receptors (properties).

Nos. 5 and 6 Monkton Green	- 160m north-east of site – 21dB
No. 69 Kingston Deverill	- 145m south-west of site – 22dB
Bridlepath/Footpath	- 90m south-west of site – 26dB

45. These levels are well within World Health Organisational Guideline Values for Community Noise which indicate levels of 50dB daytime and 45dB at night to avoid sleep disturbance and so the proposed development is unlikely to give rise to noise nuisance at the nearest residential properties. Noise levels at night will be controlled by a condition on the permission.
46. During the construction phase of the proposal (which is anticipated to last 24 weeks) there would be noise associated with normal construction activities. However, mitigation measures would be put in place to ensure that everything possible was done to reduce noise to acceptable levels. Measures would include proper silencing of plant and machinery, auxiliary equipment switched off when not in use, etc.

47. The Environmental Health Officer has raised no concerns regarding predicted noise levels both during the construction and operation phases of the site. However, they have suggested more restricted hours of working during the construction phase. These would be controlled by condition on any planning permission granted.

(vii) **Traffic**

48. Concerns have been raised by local people regarding the potential traffic hazard of having an access on to the B3095 at the point proposed.
49. During the construction phase of six months (24 weeks) it is anticipated that approximately 6 vehicles per day would attend the site. Once operational, it is envisaged that an operator in a van would visit the site once every two weeks and a six wheeled sludge tanker once every four weeks.
50. The proposals have been assessed by the County Council's Highway Development Control Section who have no highway objections to the proposal, subject to conditions being attached to ensure that the access created meets the required standards in terms of construction and visibility. In view of the very limited vehicular traffic the site would generate, it is not considered that traffic would be a problem.

(viii) **Odour**

51. A number of concerns have been raised by local people regarding the potential odour which could emanate from the site. If sewage is managed badly then it can emit an odour. However, the applicant has adopted annoyance criteria and assessment methodology with the aim of preventing nearby residents from experiencing a loss of amenity due to odour emissions from operations.
52. In the case of the proposed STW plant at Monkton Deverill, treatment of the sewage at all stages would be completely contained and therefore odour release would be very low. There would be no separate storage of the sludge and so the risk associated with de-sludging primary tanks and transferring to a storage tank is eliminated.
53. Sludge removal from the site would take place on average once a month during the daylight hours. The process takes a maximum of one hour and the only potential for odour would arise as air is expelled from the tanker as the sludge enters. It is not considered that odour would be a problem.

(ix) **Archaeology**

54. There are local concerns that the development of a plant on the site proposed could have an affect on archaeology. It is known that the field in which the plant is proposed does contain some archaeological interest. The County Archaeologist has considered that there is a high likelihood that important archaeological information may exist on the site and has suggested a condition to safeguard an investigation of the site. This would be incorporated as a condition in any planning permission granted for the development.

Conclusions

55. The application must be judged on its merits against the relevant Development Plan policies and all other material considerations.

56. The proposed development would not conflict with policies in either the Wiltshire and Swindon Waste Local Plan (Draft for Adoption) January 2005 or the West Wilts District Plan 1st Alteration – June 2004.
57. The proposal involves the development of a new STW plant to serve 20 existing dwellings in Monkton Deverill with the potential, if permitted, to serve additional West Wilts Housing Association housing in future.
58. Although concerns have been raised regarding the choice of the site from the various options evaluated, the Waste Planning Authority can only consider the application before it for determination and has to come to a view on it in planning terms.
59. The site is located well away from housing where it is less likely to cause any problems with regard to noise and odour.
60. The site can be adequately screened by planting and will be sensitively developed in order to be sympathetic with the AONB.
61. It will have its own access and security arrangements.
62. The ecological value of the proposed site is low.
63. Noise levels will be within acceptable levels and would not be a problem on site or at the nearest residential receptors. A noise condition would be imposed to ensure this.
64. Any archaeological interest will be investigated prior to construction works.
65. The development will not give rise to significant increases in traffic once constructed.
66. The development will not give rise to an odour nuisance.
67. In view of the above, it is considered that the application is in accordance with the development plan and there are no overriding material planning considerations that will justify the refusal of this application.

Recommendation

68. That planning permission be granted subject to the following conditions:-
 - (i) The development hereby granted shall commence within five years from the date of this permission.
 - (ii) Prior to the commencement of development on site a Construction Method Statement (CMS) and a Risk Assessment (RA) shall be submitted to and approved in writing by the Waste Planning Authority. The CMS and RA shall include details of how drainage will be managed during construction to prevent pollution and siltation of the River Wylye. The CMS and RA shall be implemented in full unless otherwise agreed in writing by the Waste Planning Authority.
 - (iii) All existing trees and hedgerows on the site (except for a small section of hedge to be removed to create the access) shall be retained and shall be protected during construction works in accordance with BS 5837:1991.
 - (iv) Any trees, shrubs or parts of hedges to be removed shall be undertaken outside the bird breeding season (mid March to August inclusive).

- (v) Prior to the commencement of any works required to construct the outfall to the River Wylfe, a water vole survey shall be undertaken to determine whether any mitigation is required. Details of the survey shall be provided to the Waste Planning Authority for approval.
- (vi) Landscaping of the site shall be carried out in accordance with the planting details submitted with the application. Any changes in planting details and aftercare must be agreed in writing with the Waste Planning Authority.
- (vii) The hours of operation in terms of construction of the proposed works shall be restricted to the following:-

Monday to Friday	0730 – 1800
Saturday	0800 – 1300
Sunday and Bank Holidays	No working
- (viii) The entrance on to the B3095 shall have a minimum width of 4.5 metres and shall be constructed 4.5 metres back from the carriageway edge and its sides shall be splayed outward at an angle of 45 degrees towards the carriageway edge. The area between the entrance and the edge of carriageway shall be properly consolidated and surfaced (preferably concrete) for which details shall have been submitted to and approved in writing by the Waste Planning Authority.
- (ix) Before the access hereby approved is first brought into use the turning space shown on the submitted plan shall be properly consolidated and surfaced to the satisfaction of a Waste Planning Authority. Such turning space shall be kept free of obstruction at all times.
- (x) Before the access hereby permitted is first brought into use the area between the nearside carriageway edge (the B3095) and lines drawn between a point 2.4 metres back from the carriageway edge along the centre line of the access and points on the carriageway edge 120 metres from and on both sides of the centre line of the access shall be cleared of obstruction to visibility at and above a height of 900 mm above the nearside carriageway level and thereafter maintained free of obstruction at all times.
- (xi) The first 10 metres of the access shall be properly consolidated and surfaced (preferably concrete) in accordance with details which have been submitted to and approved in writing by the Waste Planning Authority.
- (xii) No development shall take place within the area of the application until the applicant or their agents or successors in title has secured the implementation of a programme of archaeological works in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Waste Planning Authority.
- (xiii) Prior to the commencement of development on site details of the proposed lighting to be used shall be submitted to and approved in writing by the Waste Planning Authority.

- (xiv) Prior to the commencement of development on site details of the proposed fencing and security arrangements shall be submitted to and approved in writing by the Waste Planning Authority.
- (xv) During night time hours the noise levels at the nearest occupied residential property (currently No. 69 Kingston Deverill) shall not exceed 22 dB.
- (xvi) No work shall commence on the development site until a traffic management plan for the construction phase has been submitted to and approved in writing by the Waste Planning Authority. The traffic plan shall be implemented fully unless otherwise agreed by the Waste Planning Authority.

GEORGE BATTEN

Director of Environmental Services

Report Author

DAVID ROSE

Development Control Manager

The following unpublished documents have been relied on in the preparation of this Report:

Consultation responses and correspondence.