

8 February 2026

Dear Pet

HPK/2023/0110 – Mycocks Yard, Harpur Hill

I enclose a Phase 1 survey for the above site and amended plans clearly showing the separation of roof run-off from surface water run-off. I have also consulted with Dr Steve Buss who has previously produced two detailed quantitative risk assessments (DQRAs) for discharge of treated effluent to soakaway at the site. The Environment Agency has objected each time on a number of details related to the DQRAs that have been submitted.

In response to the Environment Agency's concerns that the site is in a source protection zone (1) and on a principal aquifer, we have now eliminated, using the best available technology, all potential contaminant sources:

- We have removed the toilet facilities from the proposed building so there is no treated septic waste going to the soakaway.
- Yard runoff is to be treated with a Klargester Aquatreat SWT010 full retention separator unit (which removes 61.3% of metals and 99.99% of hydrocarbons) so the water being discharged is expected to be of a quality better than drinking water standards.

Therefore, irrespective of details such as the depth of the water table and the infiltration rate, the effluent stream must be acceptable for discharge in this environmental setting. Furthermore, the site is not going to have piled foundations, but will sit on a concrete raft. Therefore, there is no risk of mobilising contaminants through the construction of foundations.

Therefore, it is Dr Buss's professional opinion that there are no material reasons for the Environment Agency to maintain its objection. I am also concerned that the Environment Agency is not responding proportionately or fairly on this site in comparison to their responses on other sites in the same area with similar levels of risk. This is having a significant impact on the applicant, who is a local employer.

The applicant is willing to have Phase 2 intrusive investigations and sampling done at discharge of condition phase, but the cost of this is prohibitive to undertake prior to a permission being issued when we have already demonstrated that overall risk is low. Conditioning this further survey work will provide an acceptable safeguard so that if any source of contamination does exist, it would be identified and remediated prior to the development taking place.

Yours sincerely

Sarah Foster MRTPI