

CONSULTATION RESPONSES

Annex 1

Name	Group/Organisation	Page	Response
Phillip Mephram	Environment Health - HDC	5	after Applications must be made to the Council to get planning permission. Please add “An application will also need to be made to the Council for a Caravan Site Licence before the site can be occupied. Consideration should be given to model licence conditions when setting out the site layout and facilities”.
Clare Dance	Environment Agency	Flood Risk	<p>Given the difficulties councils often face when providing land for Gypsy and traveller sites, and the propensity for such sites to subsequently be located in areas of high flood risk, we would like the guidance note to make it clear that Gypsy and traveller sites should not be located in areas at a high risk of flooding. There is little mention of flood risk in the draft guidance note other than stating that when the LPA is determining a planning application they will consider whether a site floods. National planning policy in the Planning Practice Guidance to the National Planning Policy Framework (table 3) states that ‘highly vulnerable’ development (including caravans, mobile homes and park homes intended for permanent residential use) should not be permitted in Flood Zone 3. This is backed up by the government’s Planning Policy for Travellers Sites which states that LPAs should ensure that their policies ‘do not locate sites in areas at high risk of flooding...given the particular vulnerability of caravans’. Given the clear stance set out in national policy, we feel that the guidance note should go further to steer potential traveller sites away from areas at risk of flooding, and make it clear that Flood Zone 3 is inappropriate for traveller sites due to the high flood risk and the associated vulnerability classification. In line with national guidance, any potential traveller sites in Flood Zone 2 will also need to demonstrate that the Sequential Test and Exception Test have been carried out in a satisfactory manner. The guidance note should also highlight that a flood risk assessment (FRA) may be required in support of a planning application (depending on variables such as the flood zone and the size of the site) and direct readers to more detailed guidance: https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications.</p>
		Foul Drainage	<p>The guidance note acknowledges that planning conditions relating to non-mains foul drainage are likely to be attached to any planning permission granted. Applicants should also be aware that in addition to planning permission they may also require an Environmental Permit from the Environment Agency where non-mains foul drainage is proposed. Further guidance is available at: https://www.gov.uk/permits-you-need-for-septic-tanks/overview.</p> <p>Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020), sets out a hierarchy of drainage options that must be considered and discounted in the following order:</p> <ol style="list-style-type: none"> 1. Connection to the public sewer 2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation) 3. Septic Tank <p>Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting Regulations 2010 any discharge of sewage or trade effluent made to either surface water or</p>

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			groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, in addition to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters. Applicants should note that the granting of planning permission does not guarantee the granting of an Environmental Permit
		Groundwater	<p>There are several different geologies across Hambleton ranging from principal to unproductive strata and hence a range of groundwater sensitivities. There is one public water supply Source Protection Zone (SPZ) for groundwater abstraction at Ainderby Steeple west of Northallerton. Therefore this is a sensitive area for groundwater and the following paragraphs from our 'Groundwater protection: principles and practice GP3' guidance apply to discharges in SPZ1:</p> <p>G2 - Sewage effluent discharges inside SPZ1 Inside SPZ1 we will require all sewage effluent discharges (new or existing) to hold a permit. All permit applications will be considered on the basis of risk assessment and the appropriateness of the discharge with respect to the local environmental setting. Where necessary we will use a notice to stop any unacceptable discharge.</p> <p>G6 - Cesspools and cesspits Inside SPZ1 we will only agree to the use of sealed sewage storage (cesspools and cesspits) if it can be demonstrated that there is no practical alternative. Outside of SPZ1 we do not encourage their use, except in anything other than exceptional End 3 circumstances. A cesspool or cesspit is a sealed unit with no discharge to the environment that is used for the storage of untreated sewage. Poorly managed cesspools and cesspits present a considerable risk of causing pollution, which can be difficult to monitor and correct.</p>