Lancashire County Council Development Management Group Environment Directorate PO Box 100 Preston Lancashire PR1 0LD Our ref:NO/2020/112968/04-L01Your ref:LCC/2020/0052

Date:

07 January 2021

Dear Sir/Madam

## ERECTION OF RECYCLING WASH PLANT TO PROCESS SELECTED WASTES -ADDITIONAL SURFACE WATER DRAINAGE INFORMATION; COMMON BANK WORKS, COMMON BANK LANE, CHORLEY, PR7 1NR

Thank you for re-consulting us on the above application on 17 December 2020.

We have reviewed the surface water drainage information/plan (SWD) on the planning application portal as the documents attached in the consultation email has been superseded with additional information.

The amended version has a cross sectional view/diagram of the onsite settlement lagoons – the drawing states that the second 'clear water' lagoon discharges via the outfall to the River Douglas, it is in fact the River Yarrow as stated in section 2 of the same document and this needs to be amended for the avoidance of doubt.

The plan drawing shows the open ditch from the east boundary round the perimeter to the first settlement lagoon (shown in pink) states "*open ditch section* (*draining to culverted section*)" - to our knowledge the culverted section has not yet been installed, and was not in place at the last site visit.

We understand that the proposed culvert works will be carried out once the stockpile of material located on the east boundary has been processed and we would like to see confirmation from the operator as to when this work will be carried out.

Secondly, the plan states the open ditch section will 'drain' to the culverted area, having attended the site it is unclear as to how or if 'draining' will be accomplished as there is a significant rise in height from the lowest point of the ditch on the east boundary to where the head will meet the culverted section. We need to know if the draining is possible via

gravity fed or if additional pumping would be required to allow the water to be taken from the east boundary, through the culvert and into the west boundary open ditch.

On the last site visit the water from the east boundary open ditch was having to be pumped into the wheel wash to then allow draining to be accomplished into the west boundary open ditch. The plan does not show the sites wheel wash which is in place at the site and currently being used to 'capture' the water from the east boundary open ditch.

Section 2 of the SWD plan states the first settlement lagoon has storage volume above the pipe of  $98m3 (14m \times 14m \times 0.5m)$  taking into account the internal batter of the lagoon sides.

Section 3 of the SWD plan states the clean water lagoon has a storage volume of 400m3 above the outfall pipe. Calculating on the same variants of the first settlement lagoon the storage capacity of the second lagoon is not 400m3.

"The storage volume above the pipe in that lagoon is 400m3. The total storage capacity of the lagoons is therefore 498m3."

Although the lagoons offer enough storage capacity we would question whether the figures add up in the SWD information provided.

Section 4 of the SWD plan states "Whilst no water is discharged from the plant, the reclaimed materials are damp as a result of the process and the water lost in this way is expected to amount to some 1,000m3 an hour." Working off the calculations provided this water loss from the reclaimed materials has the capacity to amount to a total of 1,000m3/per hour – this could amount to 40,000m3 per working week averaged over a 5 day week/8 hour per day. There is no mention of how the site will control this water loss. I appreciate the site is shown to be surrounded by a raised bund so would be limited from a pollution point of view and there is a wheel wash used by vehicles leaving the site. We have received complaints from local residents relating to materials being tracked off site.

With this additional amount of surface water that may be produced from the processed materials we would expect comments on how this additional surface water will be managed.

Section 4 of the SWD states "the reason for why the lagoons are over capacity is that they provide a source of water used by the washer plant – it then states no water is discharged from the plant, the reclaimed materials are damp as a result of the process and water is lost in this way is expected to amount to 1,000m3 an hour". It then states "surface water collected during wet weather in the clean water lagoon is harvested for use within the washing plant"

The above paragraph could be open to interpretation and seems to imply that water drained from the washed materials could somehow be harvested for use within the lagoons. Clarification is required as to the intention of the drained water from the stockpiles of materials.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the details below.

## Mr Jeremy Pickup Planning Advisor - Sustainable Places

E-mail clplanning@environment-agency.gov.uk