

Sara Scorey

From: Development Control
Sent: 18 April 2012 12:30
To: martin.berry@bristolwater.co.uk
Subject: "Application Comments"

M J Berry, you have been sent this email because you or somebody else has submitted a comment on a Planning Application to Bath and North East Somerset Council using your email address.

A summary of your comments is provided below.

Comments were submitted at 18/04/2012 12:10:14

Application Summary

Application Number:
10/05199/EFUL

Address:
Stowey Quarry, Stowey Road, Stowey, Bristol, Bath And North East Somerset, BS39 5UJ

Proposal:
Restoration of Stowey Quarry by landfilling of Stable Non Reactive Hazardous Waste (SNRHW) including asbestos and inert wastes and that the application is accompanied by an environmental statement

Case Officer:
Chris Herbert

Customer Details

Name:
M J Berry

Address:
Bristol Water
Bridgwater Road
Bedminster Down
Bristol

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BS13 7AT

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0117 934 1164

Email:
martin.berry@bristolwater.co.uk

Comments

Submission Type:
O - Objection

Comments:

Dear Sir

Stowey Quarry – Landfilling of hazardous waste – Application 10/05199/EFUL Bristol Water Response

We have provided below a brief summary of our detailed representation in respect of the above application. The full written response was submitted to the planning authority by post and e-mail on the 18th April 2012.

Summary of objection

On the basis of the evidence put forward by the applicant, we object to the proposals to develop the quarry void as a landfill site. We consider that the applicant has not fully comprehended the link between shallow ground water in the strata in which the quarry sits and the surface waters that supply the reservoir. We do not have confidence that the conceptual model represents the true situation as no survey or quantitative data has been presented in support of the model. We believe that the application is based on an inaccurate depiction of the hydrogeology. A landfill constructed as proposed by the applicant would result in an engineered liner being the only barrier between the leachate in the cells of the landfill and shallow groundwater contributing to reservoir inflows. We consider this is both a situation that may not comply with required design standards and is an unacceptable long term risk to a major public water supply. In the light of the possibility of further evidence being presented, we reserve the right to modify or strengthen our view.

Background

Bristol Water is a water supply company, licenced under the Water Industry Act 1991. As such we are required to comply with a range of regulatory duties. Of particular relevance in this case is the obligation to ensure any water we supply complies with the statutory Water Quality Regulations. With that in mind, it is our view that it is not appropriate to plan a large scale waste disposal facility where there is evidence of direct flow pathways from that facility to the main water resource for the area.

Representations to application 10/05199/EFUL Subsequent to our previous objection, we have reviewed the revised application 10/05199/EFUL. We note it does not appear that significant new information has been provided in terms of quantitative assessment of risks or new details covering construction of the liner, handling of leachate or future monitoring. We would ask the Local Authority to consider whether the Environmental Statement provided is in accordance with the new Town and Country Planning Regulations 2011.

It is our belief that the application may be technically flawed, in that it proposes the construction of a landfill directly upon a minor aquifer without any intervening geological barrier. Moreover, this 'minor' aquifer communicates hydraulically with a reservoir used for public water supply via numerous springs and streams that issue from the base of the aquifer.

When assessing the risks of landfill sites, consideration must be given to the full life of the landfill. We would need to be assured that the design will not become a pollution risk many years in the future. As the integrity of a constructed liner cannot be guaranteed in the long term, the lack of any geological barrier between the landfill and the aquifer discharging water to our reservoir renders the application flawed in our opinion.

The planning authority should have regard to the additional comments on the applicants conceptual model and other issues that have been set out in a letter sent on the 18th April 2012 by both post and e-mail.