



Foul Water Drainage Strategy



Report reference:

TANKA TANKA

73797R6

FINAL

Date issued:

February 2022

Site address: Land adjacent to Rhyd-Blawd Farm,

Overview: A combination of non-mains foul drainage systems are proposed including package treatment plants with additional phosphate removal, coupled with reed beds.

An existing foul water system will be taken out of use.

The current annual phosphate loading from the Site is between 3,439 g and 6,878 g. The proposed annual phosphate loading from the Site is 1,835g. This is a significant reduction in phosphate loading.



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1. Executive Summary

The Site, located at Rhyd-Blawd Farm, is currently an existing Moto X track (off-road motorcycle track) including access and parking area, with the remaining areas in agricultural use. The Site has in place a certificate of lawful development since the early 1990's, to host Moto X events with riders and spectators to varying levels of attendance. There is an existing foul drainage system in-situ comprised of infiltration through a gravel filled concrete lined pit with final discharge to surface water, used to serve the catering and toilet arrangements in place.

To augment the existing facilities and developments on Site it is proposed to construct a Moto X Experience Centre (Area A) and 7 log cabins (Area B) with associated access, parking and landscaping. It is proposed that the existing foul drainage arrangements are taken out of use and new foul water treatment systems will be installed. The new foul water treatment systems will offer a significant betterment to the phosphate loadings from the Site.

Objectives

The objective of this report is to provide a review of the Site setting and present a feasible foul water drainage strategy.

Summary

Constraint	Issue	Result
Discharge route	What is the infiltration potential at the Site?	Low
	What is the potential to discharge to surface water features?	High
	What is the potential to discharge to sewers?	Low
Flooding	What is the fluvial/tidal flood risk at the Site?	Very Low
	What is the pluvial flood risk at the Site?	Very Low
	What is the groundwater flood risk at the Site?	Negligible
Pollution	Is the groundwater a protected resource?	No
	Is the surface water feature a protected resource?	Yes*

^{*}The Site is located within the River Wye Special Area of Conservation (SAC) and the Dulas Brook, which flows through the Site, is designated under the Wye Valley Tributaries Site of Special Scientific Interest (SSSI).

Regulatory perspective

In accordance with Natural Resources Wales (NRW) advice issued on the 20th January 2021 following an assessment of phosphate levels within the River Wye SAC/SSSI it is necessary to demonstrate that foul drainage from the proposed development will not result in an adverse effect on the integrity of the River Wye SAC through further addition of phosphate. NRW's current planning position statement concludes that "any proposed new development that

might otherwise result in increasing the amount of phosphate withing the SAC either by direct or indirect discharges must be able to demonstrate phosphate neutrality or betterment".

The foul drainage strategy proposed follows the hierarchy set out in Planning Circular 008/2018 confirming that a package Treatment Plant would be appropriate due to the absence of any mains sewer connections nearby. The proposed strategy acknowledges the sensitivity of the local environment an includes additional treatment for phosphate removal and a tertiary treatment through a reed bed for final effluent polishing. It is anticipated that the phosphate concentration in the final treated effluent will be as low as technically possible from a private system – less than 1.0 mg/l. Percolation testing has confirmed that infiltration to ground is not possible due to the low permeability of the local geology, therefore discharge of treated effluent to surface water is appropriate.

Phosphate betterment

The proposal to take the existing foul water system completely out of use will, in our opinion, lead to a betterment in the overall quality of the effluent leaving the Site. There will be a reduction in the phosphate concentration entering the Dulas Brook and an overall reduction in phosphate loading from the Site.

The current annual phosphate loading from the Site is between 3,439 g and 6,878 g generated in Area A. The proposed combined annual phosphate loading from both Areas A and B lodges is 1,835g. This is a significant reduction in phosphate loading.

Summary of proposed foul drainage strategy:

Site area	Foul Drainage Strategy
Area A – Moto X Experience Centre	The existing foul drainage arrangement has been in-situ for a significant period of time and used on a daily basis, for a variety of events. The existing system has been confirmed not to conform to current design standards and as such is proposed to be taken completely out of use and replaced with a new system. The existing system offers little in the way of effluent treatment and nutrient removal. The closest public foul sewer connection point is in excess of 500m from the Site. On the basis of percolation testing undertaken in April 2021 the ground conditions are not conducive to infiltration.
	The daily discharge rate from the proposed development will be variable depending on use and ranges from 1.2 m³ to 5.94 m³ compared to the existing daily discharge rates of 0.4 m³ to 1.98 m³. Area A currently generates between 3,439 g and 6,878 g of phosphate loading per year. After development the proposed phosphate loading from Area A is 959 g per year.
	The following options would therefore be suitable to accommodate the proposed development.
	Primary strategy:
	This will be comprised of a Package Treatment Plant (PTP) with additional treatments to reduce phosphate concentrations in recognition of the sensitivity of the local hydrological environment. The PTP will incorporate

additional phosphate removal and treated effluent will then be passed through a reed bed, with final effluent discharged to the Dulas Brook. It is anticipated that the phosphate concentration in the final treated effluent will be as low as technically possible from a private system and will be less than the existing system.

Secondary strategy

If final discharge to surface water of treated effluent is not acceptable by the regulatory authorities then the only available option will be to contain all foul water produced on Site in a holding tank for periodic removal by tanker with off-site treatment and disposal. This option is not considered a sustainable solution.

Area B -Lodges

There are no existing drainage systems in the area proposed for the lodges. The closest public foul sewer connection point is in excess of 500m from the Site. On the basis of percolation testing undertaken in April 2021 the ground conditions are not conducive to infiltration.

The daily discharge rate from the proposed development will be 2.4 m³ compared to the existing daily discharge rate of 0 m³. The current phosphate loading from Area B lodges is 0 g per year. The proposed phosphate loading per year is 876 g.

The following options would therefore be suitable to accommodate the proposed development.

Primary strategy:

There are no existing drainage systems in the area proposed for the lodges. Therefore, a new non-mains foul drainage system is proposed, this will be comprised of a PTP with additional treatments to reduce phosphate concentrations in recognition of the sensitivity of the local hydrological environment. The PTP will incorporate additional phosphate removal and treated effluent will then be passed through a reed bed, with final effluent discharged to a tributary of the Dulas Brook. It is anticipated that the phosphate concentration in the final treated effluent will be as low as technically possible from a private system.

Secondary strategy

If final discharge to surface water of treated effluent is not acceptable by the regulatory authorities then the only available option will be to contain all foul water produced on Site in a holding tank for periodic removal by tanker with off-site treatment and disposal. This option is not considered a sustainable solution.

Area A & B combined comment

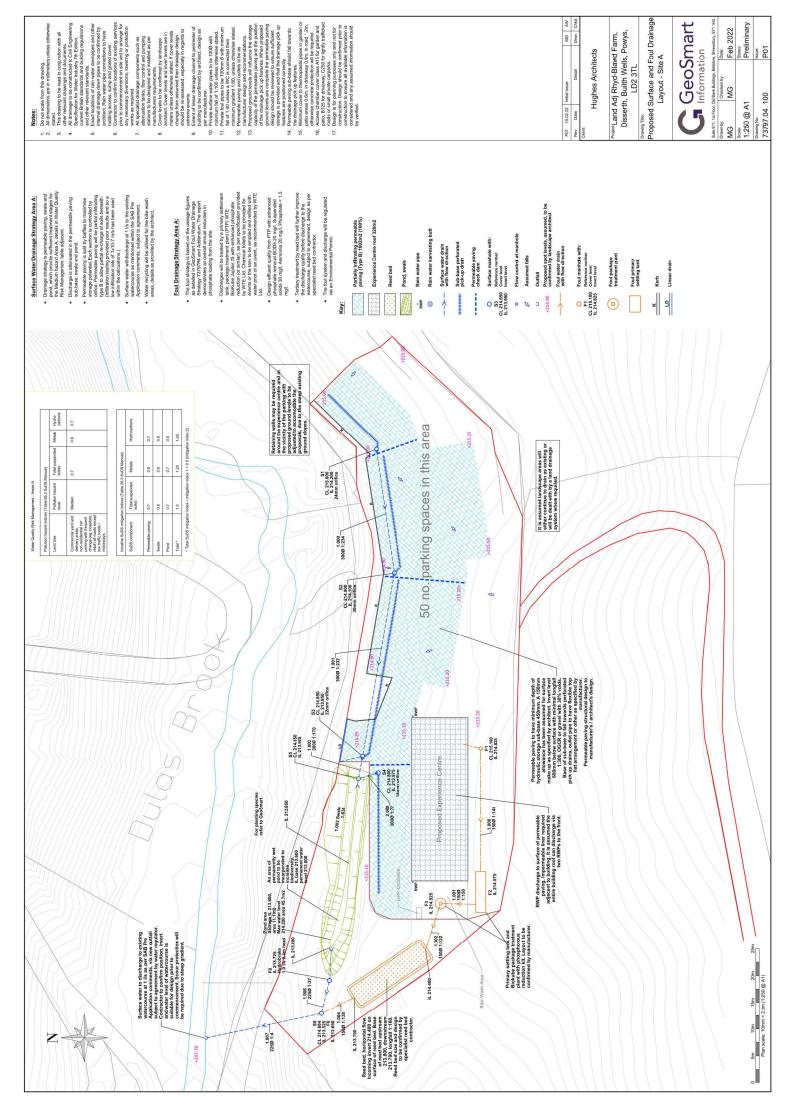
It is noted that by taking the existing system in Area A, which offers little in the way of treatment, out of use there will be a betterment in the overall quality of the effluent leaving the Site as a whole and a reduction in the phosphate concentrations and loading to the Dulas Brook.

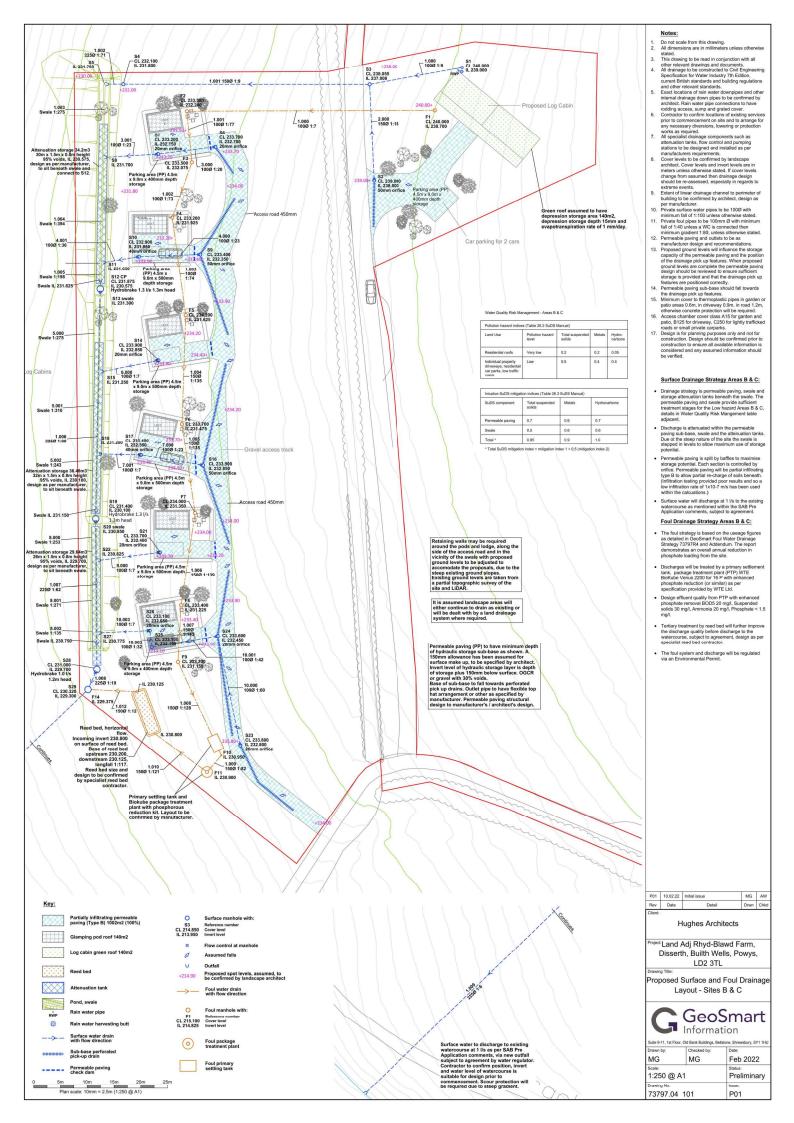
An Environmental Permit may be required for the foul effluent discharge from Site, this will be confirmed through a pre-application submission to NRW.

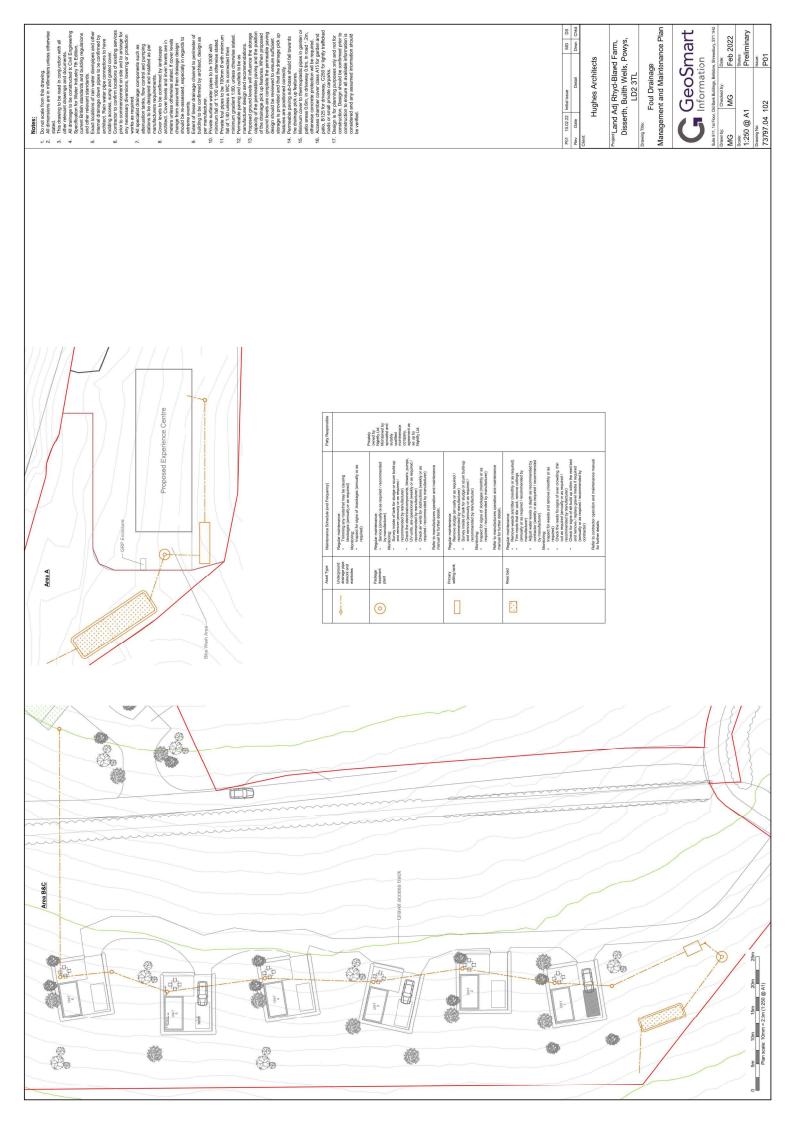
Proposed next steps

This foul water strategy should be submitted to NRW and Powys County Council (PCC) for pre-application advice to confirm that the proposed strategy can be agreed in principle prior to detailed design.

Pre-application advice should also confirm any environmental permitting or specific risk assessment requirements for the proposed development. It is proposed that Environmental Permit applications, if applicable, would be completed following receipt of planning permission, noting that no foul water could be generated until a permit was in place.







2. Site Location

Report prepared for: Hughes Architects

Entire Site area:

32,890 m² (3.29 ha)

Current use:

Agricultural and Moto X track

Proposed use:

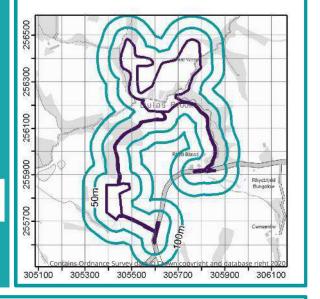
Moto X Experience Centre and lodges

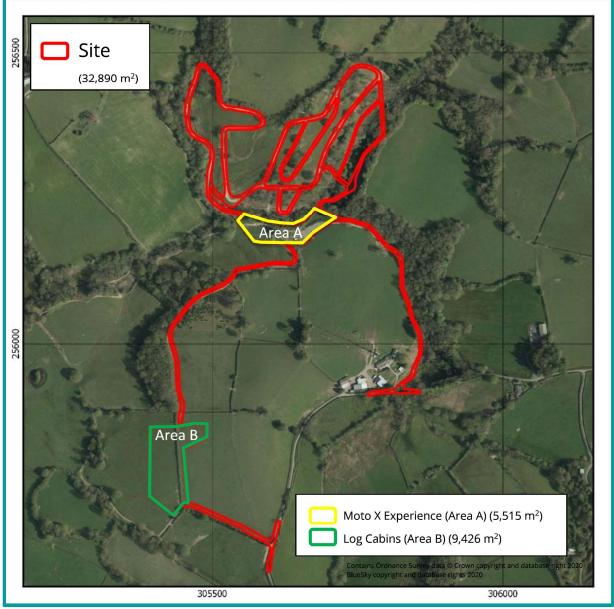
Report author:

Mike Piotrowski

Report check & review:

Alan White





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Foul Water Drainage Strategy

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3. Objective and proposed development

Objective

The purpose of this report is to provide a review of the Site setting and present a feasible foul water drainage strategy for the site of Land adjacent to Rhyd-Blawd Farm, Llandrindod Wells, Powys, LD2 3TL (the Site).

Existing development

The Site, located at Rhyd-Blawd Farm, is currently an existing Moto X track (off-road motorcycle track) including access and parking area, with the remaining areas in agricultural use. The Site has in place a certificate of lawful development, since the early 1990's, to host Moto X events with riders and spectators to varying levels of attendance.

There is an existing foul drainage system currently in-situ, marked as a foul water receptacle within the development plans in Appendix A. The existing system is used to serve the catering and toilet arrangements in Area A. There are no existing foul drainage systems in place at Area B, this area is currently agricultural greenfield space.

The existing foul drainage system comprises of a pit some 4 to 5 m deep supported with concrete drainage rings. The drainage rings are surrounded by a single land drain pipe, wrapped around multiple times, and back filled with gravel. A discharge pipe surrounded by gravel runs from the pit down through the field (as indicated on the plan in Appendix A) before discharging directly into the tributary of the Dulas Brook. The existing system and drainage field is not constructed to BS 6297:2007+A1:2008 Code of Practice for the design and installation of drainage field for use in wastewater treatment. Photographs of the existing system are provided below.

Photographs of the existing foul water system in Area A



Existing foul water receptacle



Discharge route down field from receptable (near base of tree)



Discharge passing under the track



Initial discharge at bottom of field before passing under a track



Final discharge into tributary of the Dulas Brook

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Proposed development

To augment the existing facilities and developments on Site it is proposed to construct a Moto X Experience Centre, including car parking, access and landscaping (Area A). A total of 6 residential log cabins / pods and a larger log cabin are proposed including associated parking, access and landscaping (Area B).

The proposals seek to provide new buildings associated with the existing Moto X track which provide a more formal arrangement as an ongoing commercial use.

There will be up to 20 users (riders) a day for the majority of the time the facility is operational. It is anticipated that at other times of the year (14 events – 'race days' and 3 other events) there will be more usage of the site.

The development plans indicate the following arrangements and usage characteristics, which will be used to provide the proposed foul water drainage strategy.

Table 1 Area A - Moto X Experience Centre reception building and car parking

Facility	
Moto X Experience Centre reception building	
Car park	
Moto X bike wash area*	
Drainage feature	Number of
Sinks	6
Toilets	4
Showers	2
Compound (assumed to store fuel and other items)*	1

^{*}Motorcycle washing will be undertaken in a dedicated area with no runoff into the environment and wash water will be recycled. It is also understood that any vehicle refueling and fuel storage undertaken on Site will be in a dedicated area with impermeable surfaces and appropriate mitigation measures in place to prevent fuels entering the environment or drainage systems in the event of a spill. As such these activities have not been specifically included in the drainage strategy for the Site.

Table 2 Area B - 1 Bed Log Cabins

Facility	
6 x Log Cabins access road and car parking	
Drainage feature	Number of
Sinks (kitchen and toilet)	12
Toilets	6
Showers	6

Table 3 Site B - 2 Bed Log Cabin

Facility	
1 x Log Cabin car parking and access	
Drainage feature Number of	
Sinks (Kitchen and toilet)	3
Toilets	2
Showers	2

4. Flows, loads and runoff volumes

The existing and proposed flows, loads and runoff volumes have been calculated for foul water to ensure these are managed effectively as part of the development over its lifetime.

Existing foul discharge volume (loading)

The British Water Code of Practice 4 Flows and Loads (Sizing Criteria, Treatment Capacity for Sewage Treatment Systems) document has been used to confirm the most likely usage volumes associated with the existing development for an average day to day scenario and for a 'Race Day' scenario, when the maximum number of occupants are envisaged to be using the Site. It is assumed for the purposes of the existing scenario calculations that the number of toilets already in use are the same as that which is proposed.

Existing 'Average Day' scenario

Table 4 Existing average day scenario daily discharge volumes

Area	Daily Discharge volumes (m ³)
Area A	10 l per toilet x 20 people x 2 uses /d = 400 l/d (0.4 m ³ /d)
Area B	No foul discharge volumes
Total	400 l/d (0.4 m ³ /d)

Existing 'Race Day' scenario

For the purposes of this report, and as the proposals provide 50 parking spaces to cater for the existing demand, the anticipated occupancy rate¹ of 1.58 per car will be added to the 'Average Day' Scenario to calculate the most likely occupancy for the 'Race Day' Scenario.

Table 5 Existing Race day scenario daily discharge volumes

Area	Daily Discharge volumes (m³ per day)
Area A	10 l per toilet x 99 people x 2 uses p/d = 1,980 l/d
Area B	No foul discharge volumes
Total	1,980 l/d (1.98 m³/d)

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¹ https://www.eea.europa.eu/data-and-maps/indicators/occupancy-rates-of-passenger-vehicles/occupancy-rates-of-passenger-vehicles

[&]quot;The rate of car occupancy continues to decline, but at a slower rate than during the 1980s and 1990s. The most recent data for the average number of passengers per car (including the driver) for the countries sampled is approximately 1.45 passengers per vehicle (in the UK - 1.58; Germany - 1.42 and Netherlands - 1.38 passengers accordingly) (see Figure 1). Possible reasons for this include the greater individualisation of society, reflected by the decline in household sizes, and the increase in car ownership. The data is limited to a few countries, but the trend is likely to be representative of the whole EU."

Proposed Foul discharge volume (loading)

The British Water Code of Practice 4 Flows and Loads (Sizing Criteria, Treatment Capacity for Sewage Treatment Systems) document has been used to confirm the most likely usage volumes associated with the proposed development for an average day to day scenario and for a 'Race Day' scenario, when the maximum number of occupants are envisaged to be using the Site.

Proposed 'Average Day' scenario

Table 6 Proposed average day scenario daily discharge volumes

Area	Daily Discharge volumes (m³)
Area A	40 l per shower x 20 people = 800 l/p/d
	10 l per toilet x 20 people x 2 uses p/d = 400 l/p/d
	Total: 1,200 l/p/d (1.2 m³ per day)
Area B	150 l x 2 per 1 bed lodge x 6 (camping pod) = 1,800 l/p/d
	150 x 4 per 2 bed lodge x 1 = 600 /p/d
	Total: 2,400 l/p/d (2.4 m³ per day)
Total 'Average Day' scenario volumes	3,600 l (3.60 m³ per day)

Proposed 'Race Day' scenario

For the purposes of this report, and as the proposals provide 50 parking spaces, the anticipated occupancy rate² of 1.58 per car will be added to the 'Average Day' Scenario to calculate the most likely occupancy for the 'Race Day' Scenario.

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² https://www.eea.europa.eu/data-and-maps/indicators/occupancy-rates-of-passenger-vehicles/occupancy-rates-of-passenger-vehicles

[&]quot;The rate of car occupancy continues to decline, but at a slower rate than during the 1980s and 1990s. The most recent data for the average number of passengers per car (including the driver) for the countries sampled is approximately 1.45 passengers per vehicle (in the UK - 1.58; Germany - 1.42 and Netherlands - 1.38 passengers accordingly) (see Figure 1). Possible reasons for this include the greater individualisation of society, reflected by the decline in household sizes, and the increase in car ownership. The data is limited to a few countries, but the trend is likely to be representative of the whole EU."

Table 7 Proposed Race day scenario daily discharge volumes

Area	Daily Discharge volumes (m³)
Area A	40 l per shower x 99 people = $3,960 \text{ l/p/d}$ (this is a worst case, as it is unlikely that all visitors would have a shower)
	10 l per toilet x 99 people x 2 uses p/d = 1,980 l/p/d
	Total: 5,940 l/p/d (5.94 m³ per day)
Area B	150 l x 2 per 1 bed lodge x 6 (camping pod) = 1,800 l/p/d
	150 l x 4 per 2 bed lodge x 1 = 600 l/p/d
	Total: 2,400 l/p/d (2.4 m³ per day)
Total 'Race Day' scenario volumes	8,340 l (8.34 m³ per day)

Table 8 Proposed change in daily discharge volumes between existing and proposed scenarios

Area A	Change in daily discharge volumes (m ³) from existing to proposed*
Average day	Proposed (1.2) minus Existing (0.4) = (+) 0.8 m ³ per day
Race day	Proposed (5.94) minus Existing (1.98) = $(+)$ 3.96 m ³ per day
Area B	
Average day	Proposed (2.4) minus existing (0.0) = (+) 2.4 m ³ per day
Race day	Proposed (2.4) minus existing (0.0) = (+) 2.4 m ³ per day

^{*} The (+) denotes an increase in foul discharge above the existing system.

Summary of foul flows

In summary the proposed daily discharge from Area A will be variable depending on the use and will range from 1.2 to 5.94 m³ per day.

The daily discharge rate from Area B should be less variable, assuming full occupancy and will be 2.4 m^3 per day.