

Policy/site ref Policy 13**Objector Ref** 464b**Statement of Case for Hearing**

Our earlier representations remain valid, comprise part of our case but are not repeated here.

We quote from

“Cairngorms National Park Plan 2007

FOREWORD

The one who does not look forward will look back

In this first National Park Plan we believe that we should all look forward with a collective sense of purpose.

.....



David Green
Convener, Cairngorms National Park Authority”

and also quote from

“National Park Aims

The four aims set out in the National Parks (Scotland) Act 2000 are:

1. To conserve and enhance the natural and cultural heritage of the area
2. To promote sustainable use of the natural resources of the area
3. To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public
4. To promote sustainable economic and social development of the area’s communities

Scottish National Parks differ from many other national parks around the world in that they have a social and economic development aim alongside the aims of conservation, understanding and enjoyment

of the countryside. This is an explicit recognition of those who live and work in the Park.

The aims all have equal status, however if it appears that there is a conflict between the conservation and enhancement of the natural and cultural heritage and other National Park aims, then the Park Authority must give greater weight to this aim.”

End of quotations**Further representation for the Hearing**

We suggest that the CNPA’s Policy 13 Water Resources should look forward and encourage using proven newer technologies for drinking water and waste water processing to achieve conservation and enhancement of the natural environment and the three other aims in the National Parks (Scotland) Act.

We suggest that the current Local Plan drafting on this Water Resources policy, while following National Policies, Guidance, Building Standards will adversely effect the natural environment. If this is so then the greater weight given to the natural environment aim will restrict progress on the other three aims.

We suggest that Policy 13 be redrafted in positive language favouring adoption of these proven newer technologies. We recognise that Policy 13 will need to accommodate traditional methods water and waste water processing for decades, because of the inherited built infrastructure and because realisation of the capabilities of newer technologies and their adoption into legislation, policy guidance and practice takes some time.

a) Use of Resources

i) A community or economic unit collecting or extracting water locally, using a combination of a drinking water processor to process to better than tap water standards, and, after use, a waste water processor which returns the water at high quality to the local environment, has a net abstraction of 5% of conventional methods. (The water industry guideline is that 95% of water metered in comes out as waste water.)

ii) Traditional water services extract large volumes at single points, often remote from where the water is to be used, clean up the water in a large works, then

store and distribute this over an extensive distribution mains network.

After use the waste water is collected by a sewer network, thus assembling a large volume at a point where it is processed in a large plant to the best quality conventional processes can achieve.

Next the effluent is discharged to a land soakaway or reed bed for nature to complete restoring the water to natural environmental quality.

Or where soakaways or reed beds are not appropriate the environmental regulator may permit discharge of the effluent into a water body where it will dilute and disperse.

The effectiveness of soakaways, reed beds and dilution dispersion varies with weather and other factors.

We suggest that domestic and economic development incorporating proven newer methods of providing water and waste water services can maintain or better the ecological status of local water environments rather than cause the environmental degradation of the methods currently favoured in the Local Plan.

We suggest therefore that these proven newer methods should be included as a preferred option

iii) With the newer technologies scenarios desiring surface water for processing and use, there may be an advantage in collecting it and keeping it separate from waste water. A bonus is that this reduces the surface water drainage load and flooding from runoff.

iv) The greatly reduced environmental loading of newer technologies water services provision reduces pro rata the impact on other existing or proposed water services.

c) Connection to sewerage

“Development will connect to the public sewerage network unless:-”

We suggest, as above, that when compared to newer technologies, public sewerage networks are detrimental to the natural and built environments and an expensive and inflexible option.

We suggest that where the public sewer network leads to a waste water treatment works which has

permission based on a dilution and dispersion discharge further connections should not be encouraged.

Where additional connections to the sewer infrastructure will require building additional capacity at a waste water treatment works we suggest that the case for discouragement is even stronger.

Ruling that development should connect to sewers means that, in place of returning treated waste water to the natural water environment near to where it was created, resources are consumed moving untreated sewage around.

The environment and people both suffer when sewer networks and large conventional waste water treatment works malfunction.

We suggest that sewer connection is a backward looking approach and that encouraging modern package waste water treatment plants local to waste water creation would better match the aims of the CNPA than requiring public network sewerage connection.

“Where a private system is acceptable A discharge to land (either full soakaway or raised mound soakaway) compatible with the Technical Handbooks should be explored prior to considering a discharge to surface waters.”

We suggest that with the advance of processing technologies the assumptions in the Technical Handbooks are out of date.

Modern package waste water plants can process the waste water to discharge to the local water environment at better water quality than the water receiving the discharge. This makes them independent of site conditions and avoids the uncertainty, expense and delays of soakaway site surveys, dilution modelling, etc. and frees up land required for the soakaways.

We suggest that encouraging small modern package waste water treatment plants local to waste water creation, would better match the environmental and economic development aims of the CNPA and make obsolete a requirement for a soakaway and reed bed assessment.

General Points about Proven Modern Water and Waste Water Treatment Plants

The plants we offer work reliably, are cheap, compact, have low environmental signatures and can be

installed and fully operational within weeks of a firm order with an agreed specification.

Aqualogix drinking water units are on six weeks delivery from Harlow, Essex. Microbac waste water package treatment plants are on twelve weeks delivery from Consett, County Durham.

These times could be reduced if there was any advantage from doing so and Scottish manufacture of the units could be negotiable.

Because both these drinking water and waste water units are cost and technically effective at smaller capacities than conventional plants, very much less drinking water and waste water infrastructure is needed.

Eliminated infrastructure, reduces capital and operating costs and environmental intrusion. All parties benefit from great flexibility in service provision when water services are freed from dependence on strategic infrastructure.

Man portable drinking water units and modular waste water treatment units delivered by truck or trailer mounted could be deployed to offer temporary or seasonal capacity, after the style of electricity generation or air conditioning hire units.

On the drinking water side we have German testing and approval to EU standards.

Water and the environment are matters devolved to the Scottish Parliament who would need to extend Scottish legislation to accepting technologies already tested and approved for use within the EU. We suggest that there should be few scientific or logical impediments to this.

On waste water we see no regulatory problem.

Should we need back up we have over a dozen academic research institutions on hand to verify the performance in Scottish conditions of these technologies established and used elsewhere.

About R S Garrow Ltd

R S Garrow Ltd is the business and product development company I established over twenty years ago, after seven and a half years setting up and carrying out venture capital investment at the Scottish Development Agency, predecessor to Scottish Enterprise.

How we came to be involved in Water Services plant units

When I identified some years ago water services provision difficulties and high costs constraining housing (and economic) development in Scotland, R S Garrow Ltd sought out and now offer newer but well proven technology drinking water and waste water treatment plants. Our initial objective was small developments and for these our units make commercial sense.

Then we identified from media reports that these newer technologies of ours would provide at least as good drinking water and cleaner discharge non smelly waste water processing at one twentieth to one tenth of the cost per customer of the larger plant scenarios that Scottish Water currently build.

The big differences come from the capabilities of the newer technologies and their different deployment strategies. "If you live by the sword keep up with technology or you get shot" might help illustrate how more capable newer technologies may be and also by how much the related fundamentals can change as a consequence.

Notes on the current provision of water services in Scotland

Scottish Water is a public sector body water services utility with a statutory monopoly .

Scottish Water works to Four Year Capital Investment Plans which typically are settled a year or more before the start date. ie. the 2010 - 2014 plan is already approved. The detail of these four year plans is not readily accessible.

The vast majority of CNPA developments are small and not looking so many years ahead.

The Local Authority planning permission regime does not apply to large areas of Scottish Water's construction activity. Scottish Water do not require planning permission to lay sewers and are not required by statute to inform the public on their intentions.

Where planning permission is applied for, local authority planning officers regard inclusion in the Four Year Capital Investment Plan as highly persuasive towards recommending grant of planning permission. Also persuasive is new sewer infrastructure

which may have been recently installed in anticipation of planning permission being granted.

Scottish Water's approaches are predominantly concrete and pipes civil engineering. They are inflexible, their physical and environmental foot prints are large and the potential for recycling or removing abandoned assets is small.

Ongoing violations of environmental regulations elsewhere tend to claim priority for Scottish Water investment.

Miscellaneous Points

We support the written representation of Objector 439k, Jamie Williamson of Alvie and Dalraddy Estate against "Encouraging Scottish Water to monopolise the supply of water and water treatment facilities..."

We confirm that our previous representations and this statement represent the full details of the case to be made at the hearing.

Mr Bob Garrow, director of R S Garrow Ltd, will attend and speak at the hearing.

We are not expecting to be presenting a joint case.

We confirm that we will co-operate with others.

Mr Bob Garrow will not be available for the week Monday 18th May to Thursday 21st May, both dates inclusive.

List of Documents :-

Cairngorms National Park Plan 2007 reference
CNPA.Paper.301.National_Park_Plan_2007

About Us National Park Aims reference
<http://www.cairngorms.co.uk/parkauthority/aboutus/>

We presume these will be Core documents.