

Policy/site ref Policy General - Links to Park Plan

Outcomes for 2012 vii. The habitat and water quality of rivers and wetlands will be enhanced through commencement of positive management initiatives guided by catchment management planning.

Objector Ref 464a

Statement of Case for Hearing

Our earlier representations remain valid and we refer you to our representation on Policy 13 Water. These comprise part of our case but are not repeated here.

Correction of transcription error

The most recent listing of the first paragraph of our initial representation has omitted the word *far* which changes the meaning materially. For completeness we quote our original first paragraph below.

“Traditional public water services have large local environmental impacts. These draw substantial volumes of raw water at a few points, process this to drinking quality water in large plants, then distribute this water in resource intensive, typically costing upwards of £150,000 per km, water mains to relatively large numbers of users. After use the waste water is collected in infrastructure sewers, typically costing upwards of £200,000 per km, and then processed in large waste water treatment plants before being returned in bulk to the water environment *far* from where it was drawn out.”

We quote from

“Cairngorms National Park Plan 2007

“2.5 Relationship to other Plans

The National Park Plan is informed by, and in turn provides a context for, other plans affecting the National Park. The plan is set within the national policy context and where appropriate sets out how we can collectively contribute to national objectives and add value to national policy within the National Park. In Section 5, the national policy context on which this plan builds is listed at the end of each section of strategic objectives. National policy is ever-changing and will be monitored to ensure the National Park Plan continues to deliver and add value to national

policy. In turn, the plan provides a strategic context for other plans and policies affecting the National Park.

“These include other plans prepared by the National Park Authority such as the Local Plan and the Core Paths Plan, but also plans prepared by other bodies – it provides a common direction and context to inform future management planning. In particular, there are common interests between the National Park Plan and Community Plans. Both seek to add value through partnerships and each is able to help deliver aspects of the other through better alignment of priorities and resources, and engagement with the private, community and voluntary sectors.

End of quote

Further representation for the Hearing

We suggest that the CNPA’s Policy General - Links to Park Plan should look forward and specifically encourage by a positive management initiative use of proven newer technologies for water processing to achieve conservation and enhancement of the natural water environment as a key component of catchment management planning.

We suggest that this representation should be used to inform the National Park Plan of technological progress.

Strategically the effect of new developments using newer technologies to provide water services is to reduce the load on the water environment and improve the natural water quality locally. By contrast with current conventional methods water services, development impacts negatively on the water environment.

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 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

We presume this will be a Core document.