Pre-Application Advice – Supporting Regulatory Scoping Document

DATE:	14 July 2025	**CONFIDENTIALITY:**	Confidential
SUBJECT:	Water Abstraction and Discharge Requirements		
PROJECT:	Hamsterley Forest Masterplan Development	**AUTHOR:**	[redacted]
CHECKED:	[redacted]	**APPROVED:**	[redacted]

1. INTRODUCTION

1.1 Background Information

WSP UK Ltd ('WSP') are providing support to Forest Holidays Ltd (hereinafter 'Forest Holidays') and Forestry England Ltd (hereinafter 'Forestry England') in relation to the development of a recreational masterplan at Hamsterley Forest in Hamsterley, County Durham, which will encompass three different components:

- **Forest Holidays** developments:
  - Approximately 70 holiday cabins with hot tubs;
  - Central building that will accommodate a café, shop and reception;
  - Maintenance building; and
  - Three units of staff accommodation.
- **Forestry England** Visitor Hub:
  - A visitor centre with a café, cycle hub with cycle wash; and
  - Go Ape attraction.
- **Forestry England Camping** The 'Nest'
  - 48 bed bunkhouses;
  - 10 glamping pods;
  - 10 safari tents; and
  - 25 seasonal camping pitches.

WSP have been commissioned to support with the development of the necessary environmental permit applications that will be required for the masterplan development. More specifically, WSP are assisting with the identification and clarification of the regulatory requirements associated with the groundwater abstraction and water discharge activity (WDA) that are proposed to be undertaken to service all elements of the development.

This Regulatory Scoping Document has therefore been prepared to initiate and support an Enhanced Pre-Application Advice request that has been submitted to the Environment Agency (EA), as the regulator responsible for managing abstraction activities and WDAs. The EA's advice is required to obtain confirmation from the regulator that our interpretation of the permitting requirements in relation to the proposed activities is correct, and to clarify what further supporting information will be required to accompany the applications, specifically taking into consideration the site setting and surroundings. The developments that will be focused on within this document are the Forest Holidays developments and the Forestry England Visitor Hub. Forestry England's camping development, the Nest, will not be specifically

discussed within this Scoping Document, as they will be addressed separately in a bespoke WDA permit application – they have been mentioned here for contextual purposes.

The following sections of this Scoping Document summarise the proposed abstraction and discharge arrangements and our interpretation of the relevant regulatory requirements and supporting information required to inform the necessary applications. It then provides the key queries on which we wish to gain clarification from the EA under their Enhanced Pre-Application Advice service, to ensure that activities are fully compliant with the Environmental Permitting (England & Wales) Regulations 2016, as amended ('EPR'[1]).

1.2 Request for Confidentiality

It is requested that the details captured within this Scoping Document and any other liaison with the EA in relation to this Pre-Application request are to be treated as confidential. This is because proposals for the development are the subject of an ongoing planning application with Durham County Council. The masterplan submitted has attracted much attention, and both the Council and the applicant are continuing to address the concerns raised within the public arena. Therefore, at the request of the applicant (Forest Holidays), the information provided hereinafter should be treated as confidential at present as increased public scrutiny may further impact the wider planning process and both the applicant's and the local Council's continued consultation and engagement with external stakeholders.

[1] The Environmental Permitting (England and Wales) Regulations 2016

2. SITE LOCATION AND SENSITIVITY

2.1 Site Location

A specific address for the new holiday park development is not yet available, as development on site has not yet been initiated. The address of the general Hamsterley Forest area is as follows:

Hamsterley Forest,
County Durham,
DL13 3NL.

The proposed site is situated within Hamsterley Forest in County Durham, with the approximate central point of the site being identified by the national grid reference NZ 08384 31492. In particular, the Forest Holidays site is to be located within Mill Plantation and Hatcase to the north of Hamsterley Forest, outlined in Figure 1 below.

2.2 Environmental Receptors and Site Designations

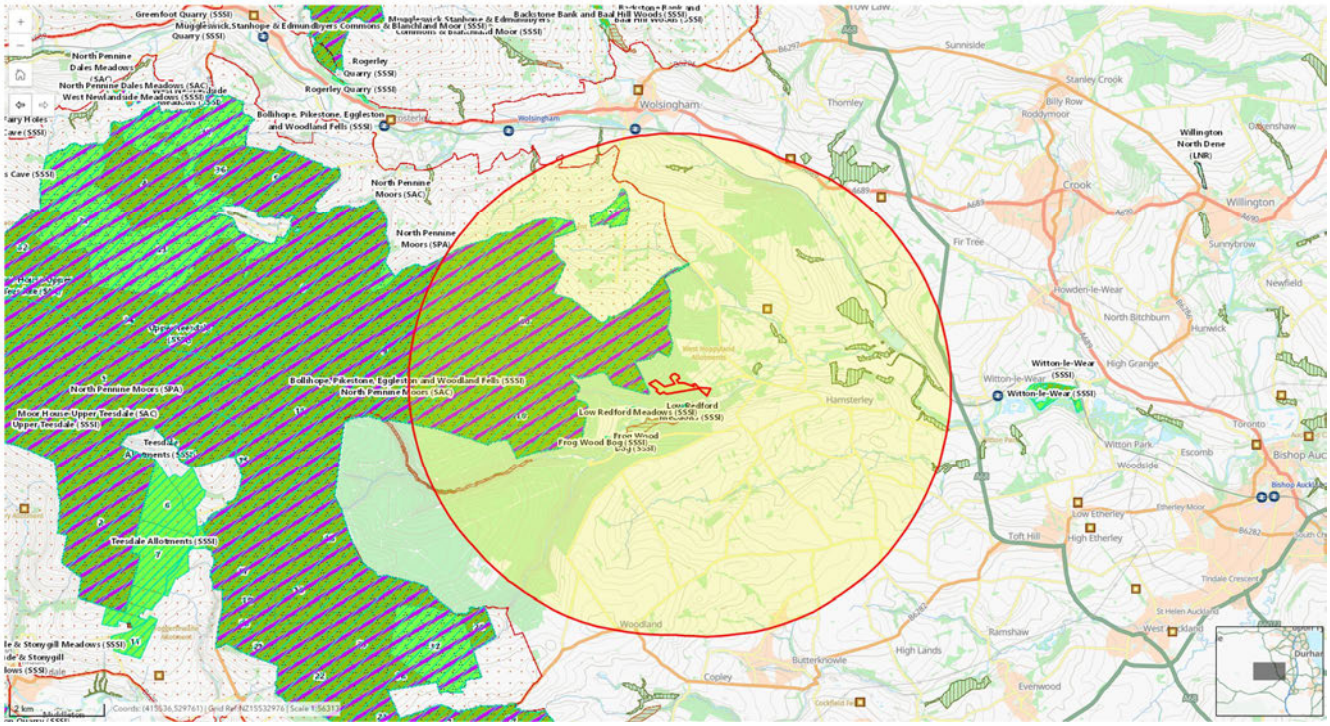
An online search has been undertaken to clarify whether the site of the proposed development and associated abstraction and discharge activity is within or near to any protected areas. The search, performed on MAGIC.GOV[2], identified the following statutory environmental designated features within a 5 km buffer of the site:

- Low Redford Meadows SSSI (closest);
- North Pennine Moors SPA;
- North Pennine Moors SAC;
- North Pennine Dales Meadows SAC;
- Frog Wood Bog SSSI;
- Bollihope, Pikestone, Eggleston and Woodland Fells SSSI;
- North Pennines AONB;
- One Higher Level Stewardship Theme Area (North East Region Theme Area);
- Six areas of Environmental Stewardship Agreements;
- 40 Countryside Stewardship Agreement Management Areas;
- 25 areas of ancient woodland; and
- One scheduled monument ('The Castles' (camp)).

There are no Ramsar sites, National Parks, National Nature Reserves or Local Nature Reserves identified within the 5 km buffer according to the MAGIC.GOV check performed.

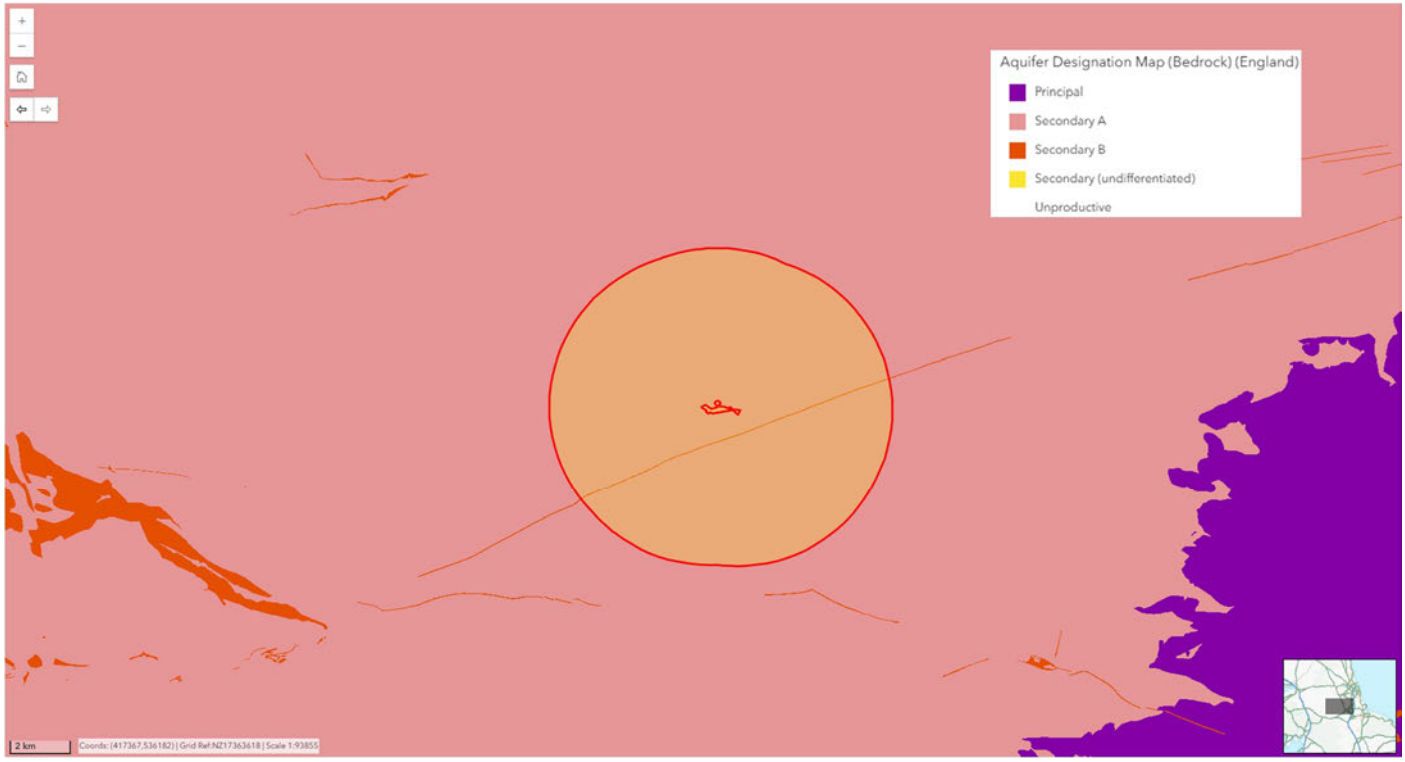
[2] Magic Map Application

Figure 1 - Screenshot from MAGIC highlighting environmental statutory designations



The search also indicated that the site area is located in areas of high, medium and medium-low groundwater vulnerability and is sited upon a Secondary A aquifer, as shown in Figure 2. The site is not located within a Drinking Water Safeguard Zone or in a Source Protection Zone. No nitrate vulnerable zones were identified within the buffer region of the site.

Figure 2 - Screenshot from MAGIC showing aquifer designations



2.3 Flood Risk

The site of the proposed development is located in a Flood Zone 1, according to the GOV.UK Flood map for planning[3], as highlighted in Figure 3 below. This means that the land on which this site is situated has a low probability of flooding from rivers and the sea. Flood risk at the site will be considered further as part of the planning application process with Durham County Council.

[3] https://flood-map-for-planning.service.gov.uk/map?lyr=mainr,fsa,fd&seg=fz&cz=408210.4,531642.2,16.56

Figure 3 - Screenshot from Flood Maps for Planning showing flood risk zones



3. PROPOSED ACTIVITIES

3.1 Overview

The focus of this Scoping Document are the activities which require environmental permits / licences associated with the development at the Hamsterley forest, specifically the activities under Forest Holidays control and operation (70 cabins with hot tubs and the relevant supporting buildings) and under Forestry England (Visitor Hub, including the Go Ape attraction). To manage the foul domestic wastewater (sewage effluent) from these sources, either one or two package sewage treatment plants (PSTP) are proposed to be installed, which will discharge the treated domestic sewage effluent into the nearby watercourse, the Bedburn Beck, via an existing outfall – the arrangements as to whether one combined or two separate PSTPs are required will be confirmed and outlined in the main application documentation. This existing outfall is connected to existing septic tank infrastructure that serves the current Visitor Centre – this infrastructure will be replaced by the new PSTP arrangement (which is yet to be confirmed). Alongside the proposed WDA associated with the PSTP, a new groundwater abstraction is required on site to supply potable drinking water to the new Forest Holidays overnight accommodation. Each of these activities are explained in more detail below.

3.2 Proposed Water Discharge Activity (WDA)

3.2.1 DETAILS OF THE ACTIVITY

The WDA will consist of the discharge of treated domestic foul wastewater (sewage effluent) into the nearby Bedburn Beck watercourse (Water Body code: GB103024072711). A PSTP will be installed on the site to treat effluent to a suitable standard for discharge into the watercourse.

The PSTP that will serve the Forest Holidays overnight accommodation is to receive all wastewater from the welfare facilities (toilets, baths and sinks etc.) associated with the Forest Holidays development, including the cabins, central building and staff accommodation, as well as from the accompanying hot tubs for each cabin. There will be no surface water (rainwater) or groundwater entering the PSTP. At this stage, the design intention is that the PSTP will encompass two holding tanks (a settlement tank and balancing tank), alongside the treatment plant unit. Treatment will likely comprise removal of sludge and settled solids from the bulk of the discharge, followed by dosing to remove contaminants. The PSTP that will support the new Forestry England Visitor Hub will receive wastewater from the visitor centre (arising from the associated toilets and café), an existing toilet block, the cycle hub (comprising one staff toilet) and the Go Ape cabin (also comprising one staff toilet).

Further details on the composition of effluent and required treatment will be finalised and detailed within the WDA permit application. PSTP specifications and treatment to be implemented will meet all relevant industry standards and certifications required and will also be operated in accordance with manufacturer recommendations.

From the PSTP, it is proposed that effluent will be discharged to the Bedburn Beck, via an existing outfall, as a continuous flow, at an anticipated maximum flow rate and a maximum daily discharge volume to be confirmed and provided in the final application (flow rate of discharge will be controlled by the PSTP). The mean flow for this river catchment is estimated at 1.224 m^3/s and the Q95 is approximately 0.147 m^3/s (Q95 is defined as the flow equalled or exceeded for 95% of the flow record and is a low flow parameter). Discharge will take place 24 hours per day, 7 days per week, throughout the year. A Water Framework Directive (WFD) Screening and Scoping Assessment has been conducted to support the planning

application for the overall development, which recommended some mitigations to prevent harm to the receiving waterbody, which will be summarised within the final permit application. Flow rates within the watercourse in the summer are likely to be lower and therefore offer reduced dilution capacity for incoming treated domestic sewage effluent. Therefore, a discharge management plan has been formulated to ensure control of seasonal rates of discharge and to reduce risk to aquatic receptors from the discharge. With the proposed embedded design mitigation in place, the assessment concluded that there would be no residual impacts at the WFD water body scale and there would be no impacts on the WFD status or objectives of the associated surface water or groundwater bodies.

The Nest (Forestry England Camping development) will be served by a separate PSTP, which will discharge treated domestic effluent into the Euden Beck, which is a tributary of Bedburn Beck. As previously mentioned, this is not the subject of this Scoping Document and a separate permit application for this WDA will be submitted.

3.2.1 VIABILITY OF CONNECTION TO PUBLIC SEWER

Following a review of the feasibility[4] to connect to a mains foul sewer, it was determined that there is no nearby foul sewer that could be reasonably connected to for the proposed discharge of the PSTP effluent, arising from the Forest Holidays overnight accommodation – greater detail on the feasibility study will be provided within the main permit application. Two potential routes to the nearest connection point in the village of Hamsterley were investigated:

- Via Route 1, the pump unit was measured to be approximately 2,700 m from the Forest Holidays proposed site; and
- Via Route 2, the distance to the pump unit was measured to be approximately 5,616 m and would also require crossing the river. This route would also involve 616 m of gravity flow for effluent to be delivered to the proposed pump station, along with a below ground river crossing and approximately 5,000 m of rising main. Therefore, in comparison to Route 1, Route 2 was not considered to be reasonable.

When considering the distance to the nearest foul sewer in relation to the number of domestic properties that the domestic treated foul effluent will arise from and the daily volume of effluent that is anticipated, using the calculations that would be required in application form Part B6, the distance to the pump station via Route 1 is not automatically ruled out and therefore, further justification as to the public sewer connection **not** being viable is provided in the points below:

- Technical difficulties associated with the historic road bridge crossing;
- Public highway disruption associated with construction;
- Continual chemical dosing requirements to reduce the septicity risk; and
- Pumping energy requirements.

A review of the feasibility[5] to connect to mains foul sewer has also been undertaken in relation to the Forest Holidays Visitor Hub developments. It was concluded that there is no nearby foul sewer that could be reasonably connected to for the proposed discharge of the PSTP effluent, arising from the Visitor Hub and associated areas. Again, greater detail on such feasibility study will be provided within the main permit application. Two potential routes to the nearest connection point in the village of Hamsterley were investigated:

[4] FDA Form Forest Holidays Hamsterley
[5] FDA Form FE Visitors Centre Hamsterley

- Via Route 1 the pump unit was measured to be approximately 2,300 m from the Forestry England new Visitor Hub; and
- Via Route 2, the distance to the pump unit was measured to be considerably longer than 5000 m and would also require crossing the river. Furthermore, this route would involve a pump station, a below ground river crossing and some 5000 m of rising main. Therefore, in comparison to Route 1, Route 2 was not considered to be reasonable.

Considering the distance to the nearest foul sewer in relation to the number of domestic properties that the domestic treated foul effluent will arise from and the daily volume of effluent that is anticipated, using calculations that would be required in application form Part B6, Route 1 can also be ruled out due to the great distance to the pump station and, therefore, public sewer connection is **not** viable. Further justification is presented below:

- Technical difficulties associated with the historic road bridge crossing;
- Public highway disruption associated with construction;
- Continual chemical dosing requirements to reduce the septicity risk; and
- Pumping energy requirements.

Both feasibility study reports detail many advantages that are associated with the option of discharging to the nearby watercourse:

- Gravity flow will deliver effluent from the site to the PSTP, reducing power consumption;
- All infrastructure will be in land under the operator's control;
- No public highway disruption;
- No risk of damage to highway bridge or unknown services in the public highway;
- Efficient access for maintenance;
- No new headwall structure required as existing headwall to be used;
- Reduction in construction difficulties; and
- No chemical dosing required for septicity issues.

3.2.4 UNDERSTANDING OF REGULATORY REQUIREMENTS

WDAs fall under Schedule 21 of the EPR[1]. According to the regulations, a permit is required for a discharge or entry to inland freshwaters, coastal waters or relevant territorial water of any poisonous, noxious or polluting matter. The proposed domestic treated sewage effluent, from the Forest Holidays' holiday park and Forestry England areas that are discussed above, is to be discharged into the Bedburn Beck, which comprises an inland freshwater. Therefore, it is expected that a WDA permit will be required, covering both WDAs.

The proposed WDAs (treatment and discharge of domestic sewage effluent) do not meet the General Binding Rules[6] for small sewage discharges to water or fit within any of the available exemptions or exclusions listed in the guidance on the GOV.UK website, particularly as the volume of discharge per day is expected to be > 20 m^3. Furthermore, the requirements for a standard rules permit, due to the volume of effluent to be treated and discharged, cannot be fulfilled, therefore a bespoke WDA permit is expected to be required to be applied for[7].

[6] General binding rules: small sewage discharge to a surface water - GOV.UK
[7] Environmental Permitting Guidance - Water Discharge Activities

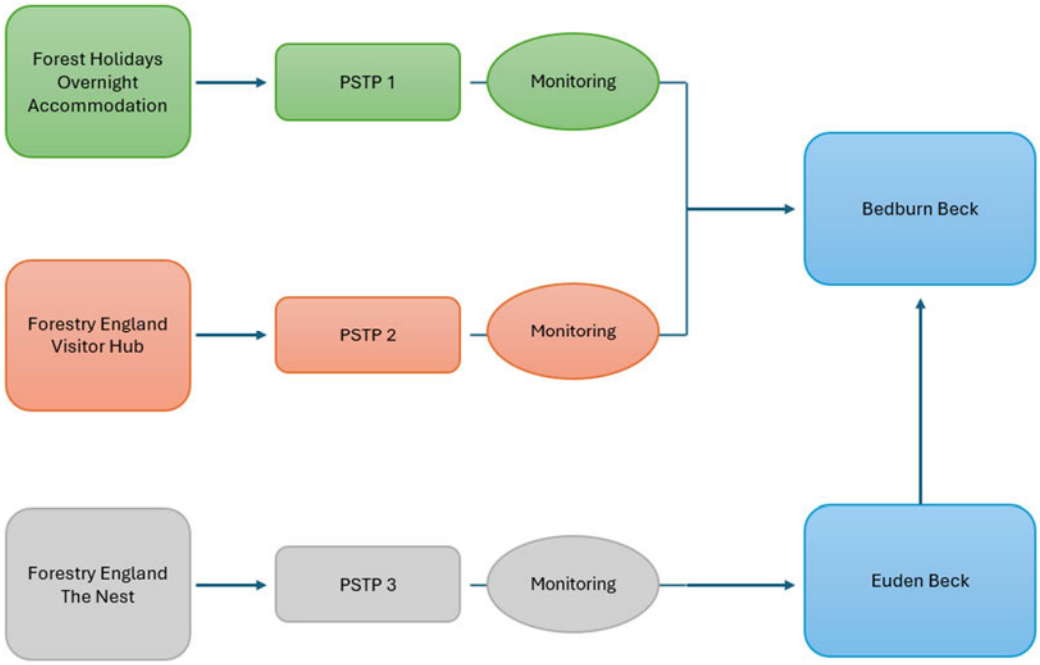
It is considered that one bespoke WDA permit should be applied for which would cover the two proposed WDAs:

1. Discharge of treated domestic foul effluent from Forest Holidays' overnight accommodation;
2. Discharge of treated domestic foul effluent from Forestry England's Visitor Hub.

It is proposed that a Joint Operator application is submitted between the two organisations, as both are proposing to discharge via the same outfall location into the same watercourse. It is expected however that the bespoke WDA permit would include separate monitoring requirements for both PSTPs (to enable representative samples of each discharge stream to be obtained prior to discharge into the receiving watercourse). Figure 4 provides a schematic overview of the proposed WDAs that would be covered by the Joint Operator permit.

Forestry England's WDA arising from treated domestic effluent from the Nest is anticipated to require a standalone WDA permit due to the receiving watercourse being different to that for the other WDAs (Euden Beck, a tributary of Bedburn Beck) and so will be discussed with the EA as a separate matter in a separate Regulatory Scoping Document.

Figure 4 - Schematic to demonstrate the proposed arrangements under the Joint Operator WDA. For contextual purposes, the diagram also includes the WDA arising from the Nest (Forestry England), entering the Euden Beck, which is a tributary of the Bedburn Beck.

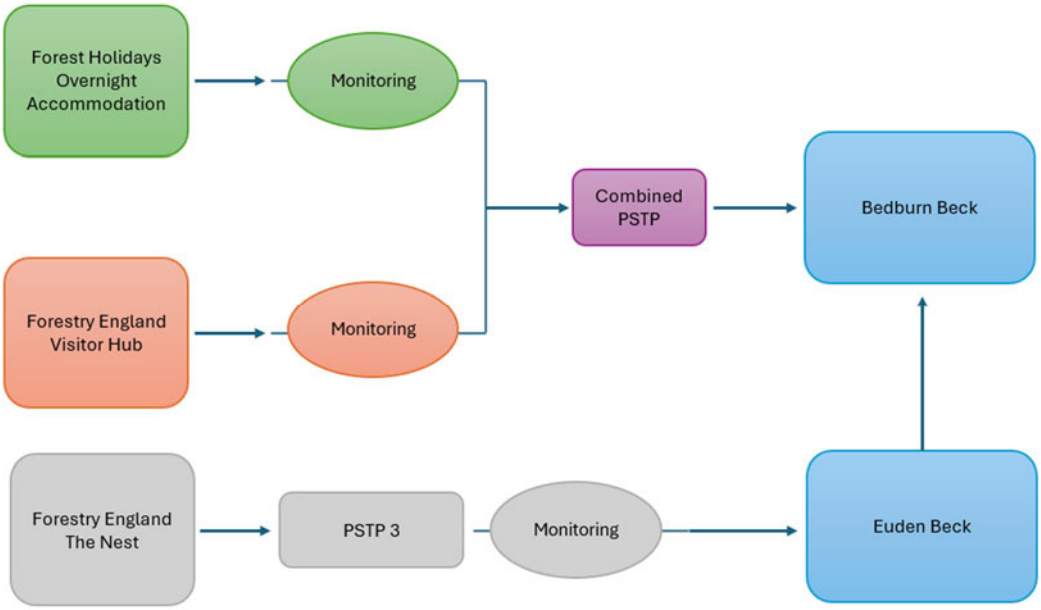


As part of the bespoke WDA permit application, it is understood that a Surface Water Pollution Risk Assessment (also known as a 'H1' screening assessment) may be required, in accordance with GOV.UK guidance[8], if the discharge of treated domestic sewage effluent contains any specific substances. This will be dependent upon the design of the PSTPs and will be undertaken, if required, to support the main application.

[8] Surface water pollution risk assessment for your environmental permit - GOV.UK

Alternatively, there is currently a proposal being considered for a joint PSTP to serve both the Forest Holidays overnight accommodation and the Forestry England Visitor Hub, meaning that domestic foul effluent would be combined prior to entering the PSTP, treated as a combined flow and discharged into the Bedburn Beck. It is anticipated that this would also require a Joint Operator WDA permit as both organisations would be responsible for the on-site management of the PSTP and associated discharge. Figure 5 provides an overview of these potential alternative arrangements that would be covered by the Joint Operator WDA permit.

Figure 5 - Schematic to demonstrate the alternative proposed arrangements under the Joint Operator WDA. For contextual purposes, the diagram also includes the WDA arising from the Nest (Forestry England), entering the Euden Beck, which is a tributary of the Bedburn Beck.



The final arrangements will be established and detailed in the permit application.

3.3 Proposed Groundwater Abstraction

3.3.1 DETAILS OF THE ACTIVITY

A new groundwater abstraction activity is also proposed to provide potable drinking water to the overnight accommodation development. The intent is for this to supply the whole Forest Holidays development. It will not be required to supply the new Visitor Hub development (Forestry England) as this is served by an existing supply. Near to the proposed location of abstraction, there is an existing spring fed abstraction. The rate of abstraction from the new groundwater abstraction point, required to meet clean cold-water demand, is anticipated to be approximately 60 m^3 / day and also will be actively and continuously abstracted, to serve the holiday park. There is also an anticipated requirement of a minimum of 80 m^3 of clean cold-water storage.

The method of abstraction will be via a down-hole borehole pump to be operated at a maximum flow rate that ensures sustainable abstraction yield is not exceeded. The proposed borehole location, accounting for

various factors, is to be within the planned maintenance / staff accommodation area of the holiday development (NZ 408870 531470). Following a borehole feasibility study[9] (carried out in November 2024, by HighWater), this location is deemed suitable, with findings from the study to be further detailed in an application to licence the abstraction activity.

3.3.2 UNDERSTANDING OF REGULATORY REQUIREMENTS

It is understood that the proposed abstraction activity will require a Water Resources Abstraction (WRA) licence to be granted by the EA, due to the anticipated volume of abstraction required. As it is expected that approximately 60 m^3 / day of water will need to be abstracted, a full abstraction licence is considered to be most appropriate, as the threshold of 20 m^3 of groundwater abstracted per day will be exceeded, and there are no other exemptions that are applicable.

As abstraction will be from groundwater, a hydrogeological impact assessment (HIA) will be prepared to support the WRA licence application in order to:

- Identify and understand the risks related to the abstraction activity; and
- Design mitigation measures which manage the impact on other abstractions and the environment.

It is understood that a Groundwater Investigation Consent (GIC) may be required from the EA, to obtain consent for drilling and testing of the borehole, prior to submission of an application for the WRA licence.

[9] Borehole Feasibility Report ForestHolidays-CountyDurham SB/CF

4. CLARIFICATION REQUIRED FROM THE ENVIRONMENT AGENCY

As part of the Enhanced Pre-Application advice service that the EA provides, clarification is being requested as part of this Regulatory Scoping Document specifically on the below to ensure that all legal and regulatory requirements have been interpreted correctly:

- Please can the EA confirm that a Joint Operator bespoke WDA permit will be most suitable to regulate the proposed WDA from the PSTPs discharging into Bedburn Beck?
- Please can the EA confirm that the application for a bespoke WDA permit will require the completion of the following application forms: Part A, Part B2, Part B6 and Part F1 with appropriate appendices?
- For the proposed WDA, as this will comprise the discharge of treated domestic sewage effluent to a receiving watercourse, it is acknowledged that a Surface Water Pollution Risk Assessment (or 'H1' screening assessment) **may** be required to support the WDA permit application, if there are substances present that are listed on the EA's EQS spreadsheets.
  However, at this stage, if the effluent does not contain any specific substances from these lists (subject to final PSTP design) it is envisaged that an H1 assessment will not be required. Please can the EA confirm that this approach is suitable and in line with their expectations for these types of WDAs?
- If an H1 assessment is required and any substances fail the screening tests, further modelling may be required. It is expected that the EA will carry out the modelling if required. Please can the EA confirm that this is correct?
- Please can the EA provide indicative emission limit values (ELVs) that the PSTP should be designed to?
- Please can the EA indicate what will be expected to be included in permit applications in relation to the potential cumulative effect of the discharge into the Bedburn Beck from the joint WDA, downstream from the discharge into the Euden Beck (a tributary of Bedburn Beck) arising from Forestry England's The Nest development, mentioned in this document?
- Please can the EA provide confirmation of the charges associated with a Joint Operator WDA permit?
- Please can the EA provide confirmation of the charges for two separate WDA permits, if the Joint Operator WDA permit is not suitable?
- Please can the EA confirm whether any other further supporting information / assessments (e.g., Habitats Regulations Assessment (HRA) information (a HRA has already been prepared by the applicant), bespoke qualitative environmental risk assessment, Water Framework Directive information) will be required as part of the WDA permit application? It is understood that the EA will conduct their own HRA which may incur additional fee at point of permit submission.
- Please can the EA estimate the timeframe that can be expected for permit determination?
- Confirmation if a GIC will be required to be applied for, comprising completion of the following: Form WR32 and, if requested from the EA, a water features survey.
- Confirmation that a full WRA licence will be required to be applied for, comprising completion of the following application forms: Part A (form WR328), Part B (form WR330), Part C (form WR332) and Part E (form WR390).
- Confirmation of the charges associated with a GIC application and a full WRA licence for the proposed abstraction activity and details of any further supporting information which will be needed.