From: North Planning
To: Geoff Mason; North Planning; North Planning
Cc: ken.skates@senedd.wales; john.mccusker01@btinternet.com; planning_admin
Subject: Re: P/2022/0289 Fir Tree house. Cloy Lane, Overton on Dee, Wrexham LL13 0HR NRW:07742160
Date: 14 June 2023 15:28:45

Dear Mr Mason,
Thank you for your email, dated 05/06/2023.
We agree that in an email to then planning officer Simon Greenland dated 21/06/2022, our advice regarding proximity of other drainage field stated:
"In the 'Phosphates' document G.C.Mason states that the criterion that "cannot be met is the 200m distance from any other discharges to ground and the density ratio of 1 for every 4 hectares." We don't believe this to be the case in this instance. Our records show the nearest sewage discharge is 455m away and this should therefore not be an issue."

However, in July 2022, shortly after this email, our Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation was updated to version 3.

This explains why our most recent response letter to the Local Planning Authority (LPA), dated 06/03/2023 (CAS-209744-W3G8) refers to this updated advice, and why we referred specifically to this part of updated advice:

"In the absence of complete data, Planning Authorities are advised to use mapping/aerial photography to assess proximity to existing properties likely to have a private drainage system and consider whether further site investigation may be required."
We have not been consulted on any further information from the LPA, but from your email it appears that their investigations have revealed other private drainage systems nearby that we were not aware of.

Version 3 of our advice includes the value of 200m separation between constructed drainage fields as a screening criteria for likely significant effect. It does not mean that a system less than 200m from another drainage field cannot be installed. As set out in the advice, the purpose of this metric is to ensure that where drainage fields are closer than 200m, the necessary checks are made by Planning Authorities in the Appropriate Assessment stage of a Habitats Regulations Assessment to ensure that new discharges to ground will not compromise the ability of adjacent systems to function correctly or prevent a new system from doing so. In rural settlements without mains drainage and where space may be limited there is a risk that multiple drainage fields in close proximity may not work effectively. Failure of a drainage field to operate effectively can lead to increases in phosphorus discharges to nearby watercourses. We do not set out a specific process for this in our advice as the approach should be appropriate and proportionate according to the specifics of the proposal where the planning authority has the discretion to decide how this assessment is undertaken as it does for other technical aspects of any Appropriate Assessment.
You refer in your email to revised proposals, and the installation of a two-chamber PSTP, specifically designed to reduce the phosphate outflow to zero and consequently are permitted to discharge directly into watercourses.

We have not been consulted by the LPA on the revised proposals, but would refer you to the section titled "Can phosphorus reduction technology be used in private sewage treatment systems?" of our Advice.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for the local authority to determine.

I hope this is of assistance.

Kind regards,

Rhys Jones
Tîm Cynllunio Datblygu / Development Planning Team
Cyfoeth Naturiol Cymru / Natural Resources Wales
Ffôn / Tel: 03000 653002
www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk
Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.
Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

------------------- Original Message -------------------
From: Geoff Mason <gcmason47@yahoo.co.uk>;
Received: Mon Jun 05 2023 17:23:25 GMT+0100 (British Summer Time)
To: North planning <northplanning@cyfoethnaturiolcymru.gov.uk>; North Planning Mailbox Queue <northplanning@cyfoethnaturiolcymru.gov.uk>; North Planning <northplanning@cyfoethnaturiolcymru.gov.uk>;
Cc: ken.skates@senedd.wales; john.mccusker01@btinternet.com;
Subject: Re: P/2022/0289 Fir Tree house. Cloy Lane, Overton on Dee, Wrexham LL13 0HR NRW:07742160

Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni nac atodiadau agored oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

My planning application is being held in abeyance until 31/08/2023 as we have only recently been informed that the site is within 200 metres of 4 other private drainage to ground systems. This is particularly frustating as we were advised by NRW nearly 12 months ago that there were no such discharges within the 200 metre limit required of the new regulations.
In our revised proposals, we have specified the installation of a two- chamber PSTP, specifically designed to reduce the phosphate outflow to zero and consequently are permitted to discharge directly into watercourses. Surely this system is designed to comply with the new regulations?
As I have stated in previous correspondence, the blanket embargo on all new private drainage schemes is a grossly unscientific knee-jerk response to a very real crisis in the Dee water quality, which should take into consideration the huge variations in the geographical and hydrological situations of each site.
NRW has had a year to come up with sensible practical solutions to this situation . Might I suggest your officers spend some time at C.A.T. in Machynlleth, wherer they will find a range of practical solutions to this problem including what I have suggested above, together with compost toilets, recycling grey water etc. You should be leading on this!!!

Regards.
Geoff Mason

On Thursday, 29 December 2022 at 15:46:59 GMT, North Planning <northplanning@cyfoethnaturiolcymru.gov.uk> wrote:

Dear Mr Mason
Apologies again for this late response to your email. As your query poses several questions, we are unable to provide answers at his stage. We advise that the best way forward for you to apply for pre-application advice via our Natural Resources Wales / Pre application advice for environmental permits. You will need to ensure that you have an Environmental Permitting Regulations Permit for the sewage treatment in place before commencing any building works.

Please contact me if you have any questions.
Kind regards.
Rhys Jones

Tîm Cynllunio Datblygu / Development Planning Team
Cyfoeth Naturiol Cymru / Natural Resources Wales

Ffôn / Tel: 03000 653002
www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

------------------- Original Message -------------------
From: Geoff Mason <gcmason47@yahoo.co.uk>;
Received: Tue Dec 06 2022 16:05:49 GMT+0000 (Greenwich Mean Time)
To: North planning <northplanning@cyfoethnaturiolcymru.gov.uk>; North Planning Mailbox Queue <northplanning@cyfoethnaturiolcymru.gov.uk>; North Planning <northplanning@cyfoethnaturiolcymru.gov.uk>;
Subject: P/2022/0289 Fir Tree house. Cloy Lane, Overton on Dee, Wrexham LL13 0HR

Good Afternoon,
I have been asked by planner Sharon Holman to undertake percolation tests around the site of the proposed septic tank on the above planning application. As the terrain and heavy clay are virtually the same as in the area where two test pits were dug some 3 weeks ago and which were still two thirds and one half filled respectively after the 24 hour initial test period, there seems little point in going to yet more additional expense to dig further test pits. In the case of a failed percolation test how can I produce percolation figures? Does this mean that septic tank is not suitable?

The proposed plot could be extended to include an area of up to 250 square metres for a drainage field/leaching area. The GOV.UK formula indicates a daily sewage discharge of 0.47cubic metres per day for a 2 bedroom dwelling. The water table appears to be between 1.5 and 2 metres below the surface.
Should this not be accptablecould you advise me on the alternatives?
Kind Regards,
Geoff Mason, of Fir Tree House, Cloy Lane, Overton on Dee, Wrexham LL13 0HR