

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

Wrexham County Borough Council,
The Guildhall,
Wrexham,
LL11 1AY

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

24/06/2022

Dear Mr Greenland,

BWRIAD / PROPOSAL: 6 GLAMPING PODS AND ASSOCIATED GROUNDWORKS

LLEOLIAD / LOCATION: WHITEWELL, WHITCHURCH

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the additional information on the above, which we received on 26th November 2021.

We continue to have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, further consideration is required regarding foul drainage. Further details are provided below.

Foul Drainage and Protected Sites

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphate levels for all river SACs across Wales. As part of this package, we issued a [Planning Position Statement](#), in which we advised that any proposed development that might increase the amount of phosphate within a river SAC catchment could lead to damaging effects to the SAC. Therefore, such proposals should be screened through a Habitats Regulations Assessment (HRA), to determine whether they are likely to have a significant effect on the SAC. We have also issued [Planning Advice](#) (May 2021) which gives specific advice in respect of foul drainage arrangements for new developments.

The report submitted with the application ('Phosphate Reduction Calculation and Proposal' ref J16289 produced by Viltra) confirms that the daily discharge rate once the site is fully developed would reach a maximum daily rate of 4.5 cubic metres (m³). Please note the [Planning Advice](#) states that developments with a maximum daily discharge rate of less than 2 cubic metres (m³) can be screened out.

Phosphorous reduction technology has been proposed in the PTP to reduce the amount of phosphorous in effluent being discharged to ground. We advise that there is no additional benefit of installing phosphate stripping where the system is discharging to ground,

furthermore chemical dosing has the effect of producing considerably large volumes of sludge that would need disposal as well as the impact of the chemicals used when ultimately spread to land following treatment at a wastewater treatment works.

We note from the information submitted it is proposed to combine the discharge from proposed glamping pods and the existing dwelling to a new package treatment plant (PTP) and subsequent discharge to ground via a drainage field.

Where a new drainage field is proposed in close proximity to other known existing and proposed drainage fields, there is risk of the effectiveness of the drainage field(s) being compromised. Poor operation of drainage fields can lead to increased phosphorus discharges to SAC river systems. We therefore advise Planning Authorities to consider site conditions (such as proximity to adjacent drainage fields, soil type, depth to groundwater, distance to surface water features and SAC boundary etc) to determine with certainty that existing and proposed drainage fields will operate effectively in the future and prevent any increase in phosphorus from entering a river SAC. Planning Authorities may wish to refer to advice on groundwater risk assessments to inform any technical assessments [Groundwater risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit)

In light of the above information, we advise that your Authority should screen the proposal through a HRA. Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity. You should then consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

We advise the Applicant to contact our Permitting Team on 0300 065 3000 at the earliest opportunity, to try to ensure that there is no conflict between any planning permission granted and the permit requirements. It is important to note that a grant of planning permission does not guarantee that a permit will be granted, should a proposal be deemed to be unacceptable (either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible). The Applicant should ensure that they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site.

More information, including a step by step guide to registering and the relevant application forms are available on our [website](#). Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations. We also refer the Applicant to Guidance for Pollution Prevention 4 on the [NetRegs website](#), which provides further information.

Flood Risk

We have no objection to the application on flood risk grounds as submitted.

Our Flood Risk Map confirms the application site lies partially within Zone C2 of the Development Advice Map (DAM) contained in TAN15 (internal access road) and also partially within Flood Zone 2 & 3 (Rivers) of the Flood Map for Planning.

Given the location of flood risk shown to be affecting the application site (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks to these areas.

The Iscoyd Brook runs along the southern boundary and is seemingly culverted to form the existing access. We recommend you consult your internal flood risk advisors with regard to site access/egress and to ascertain whether there are any known operational issues with the brook.

Protected Species

We note that the ecological report submitted in support of the above application (Marshall, P., July 2021, Ecological Appraisal, ref: 21-05 163.1R, Greenscape Environmental) identified that bats were not present within the building to be demolished and that no amphibians were found on site. We have no further comments.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Rachael Burke

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales