

Matthew Phillips

From: North Planning <NorthPlanning@cyfoethnaturiolcymru.gov.uk>
Sent: 22 March 2022 11:23
To: Matthew Phillips
Subject: FW: P/2020/0239 - Land Adjacent to Graig Wen Farm, Off Brymbo Road, Bwlchgwyn, Wrexham (D.O.C 6, 7, 8, 9, 10 & 11) V8 - NRW Response NRW:01114553
Attachments: By Product Services Confirmation Letter.pdf; RE P20200239 - Land at Bwlchgwyn NRW01114468.msg
Importance: High

Good morning Matthew,

We note the additional information submitted by the agent and our previous responses remain valid and attached for reference.

As the development is deemed to be within the sewer catchment from the information provided to date, evidence needs to be provided as to why this is not feasible to connect (as per previous correspondence). This would be the case for any proposal. As previously noted we advise that the applicant begins liaising the permitting department at NRW at the earliest opportunity.

[Natural Resources Wales / Private sewage treatment in an area with a public sewer](#)

The evidence of why not feasible to connect to mains foul would be assessed as part of the permit application for the proposal below as an exemption would not be permissible in this case. For more information, see the following links:

[Natural Resources Wales / Apply for a permit to discharge domestic sewage](#)

[Guidance notes Part B6.5 \(cyfoethnaturiol.cymru\)](#) (5d in particular details the evidence needed)

We note that reference is made to drainage mounds. For further details – see page 15/16: [GPP 4 \(netregs.org.uk\)](#)

A cess pit is considered a last resort in Wales and so consideration of an alternative means is welcomed in line with the drainage hierarchy. It is important that operators take responsibility to ensure the exported effluent is being managed appropriately by others. Our ongoing assessment indicates that the impact of effluent from private and public wastewater treatment systems may need to be considered in appropriate assessments for developments which will be dependent on the details of each case.

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

Kind regards,

Siôn M. Williams

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales

Swyddfa / Office: Maes y Ffynnon, Bangor, Gwynedd

----- Original Message -----

From: Trevor Mennell <trevor@tmplanning.co.uk>;

Received: Thu Mar 10 2022 12:55:06 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: FW: P/2020/0239 - Land Adjacent to Graig Wen Farm, Off Brymbo Road, Bwlchgwyn, Wrexham (D.O.C 6, 7, 8, 9, 10 &11) V8 - NRW Response NRW:01114553

FAO: Sion Williams

Dear Sion,

With reference to your previous request for information on a licensed contractor for the collection of sewage waste from the proposed cess pit .

I have since contacted a local company and attach a copy of their confirmation

I trust this is sufficient for the planning team to recommend approval.

It would be appreciated if you would contact Matt Philips at Wrexham Council at your earliest opportunity.

Thanking you in anticipation.

Following

Kind Regards

Trevor Mennell
Trevor Mennell Planning

Tel: 01743 874662
Mobile: 07968 87662
Email: trevor@tmplanning.co.uk

Please note: as from 11th August 2021 my email address has changed to trevor@tmplanning.co.uk

From: trevor@tmplanning.co.uk <trevor@tmplanning.co.uk>
Sent: 09 March 2022 20:03
To: 'Matthew Phillips' <Matthew.Phillips@wrexham.gov.uk>
Subject: RE: P/2020/0239 - Land Adjacent to Graig Wen Farm, Off Brymbo Road, Bwlchgwyn, Wrexham (D.O.C 6, 7, 8, 9, 10 &11) V8 - NRW Response NRW:01114553
Importance: High

Dear Matt

Further to my email below, please find attached confirmation letter from By Product Services Ltd who are a NRW licensed carrier confirming they are prepared to enter into a contract with Mr William Evans as requested by Sion Williams at NRW.

I look forward to hearing from you soon with a positive outcome.

Kind Regards

Trevor Mennell
Trevor Mennell Planning

Tel: 01743 874662
Mobile: 07968 874662

Please note: as from 11th August 2021 my email address has changed to trevor@tmplanning.co.uk

Email originally sent 7th March 2022

Hi Matt,

Thank you for your email , also thank you for your efforts in attempting to get this situation resolved.

I also agree that the only way forward is a private drainage system.

This was also previously confirmed (having provided a mountain of information to the Council) by Jason Russell the Councils Drainage Engineer at that time. See email attached.

Emma has recommended a good solution in using a Drainage Mound.

This involves an above ground, mounded filtration system, where treated sewage effluent is pumped into the upper level of the filtration mound for secondary treatment.

I would suggest the initial sewage treatment to be by a private Bio Disc sewage treatment plant which has a clear water discharge .

This would then have further purification by the Mound.

However, I have today contacted an N.R.W licensed waste company who will enter into a contract with my client to empty a cess pit should it be required. I have requested he confirms this for the record.

HOPEFULLY, we can now move forward.

Speak to you soon.

Kind Regards

Trevor Mennell
Trevor Mennell Planning

Tel: 01743 874662
Mobile: 07968 87662
Email: trevor@tmplanning.co.uk

Please note: as from 11th August 2021 my email address has changed to trevor@tmplanning.co.uk

From: Matthew Phillips <Matthew.Phillips@wrexham.gov.uk>

Sent: 02 March 2022 13:42

To: trevormennell@freenetname.co.uk

Cc: Emma Broad <Emma.Broad@wrexham.gov.uk>

Subject: FW: P/2020/0239 - Land Adjacent to Graig Wen Farm, Off Brymbo Road, Bwlchgwyn, Wrexham (D.O.C 6, 7, 8, 9, 10 & 11) V8 - NRW Response NRW:01114553

Trevor.

Billy phones me a few times a week but unfortunately I am not able to offer him a solution as yet.

Emma and I have been discussed the matter with NRW and I have tried to persuade them that the private drainage system is the only option here.

We can't accept a cess pit – for the reasons set out below. But I am not able to offer an alternative solution as yet and I would want to give you a clear steer on an alternative until we can be confident it is likely to be supported by NRW.

I understand Billy's desire to get on site asap and I also understand his frustrations as to why this has been so protracted. This will come as no consultation, but foul drainage is holding up significant numbers of proposals across the County Borough and we are doing what we can to identify solutions but unfortunately this will take time.

Regards

Matthew Phillips

Pennaeth Dros Dro'r Gwasanaeth Polisi Cynllunio/Interim Head of Service Planning Policy
Cynllunio a Rheoleiddio/Planning and Regulatory



01978 298780



Cyngor Bwrdeistref Sirol Wrexham, Neuadd y Dref, Wrexham, LL11 1AY



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



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From: Matthew Phillips

Sent: 02 March 2022 13:38

To: 'Williams, Sion M.' <Sion.M.Williams@cyfoethnaturiolcymru.gov.uk>; Emma Broad
<Emma.Broad@wrexham.gov.uk>

Subject: RE: P/2020/0239 - Land Adjacent to Graig Wen Farm, Off Brymbo Road, Bwlchgwyn, Wrexham (D.O.C 6, 7, 8, 9, 10 & 11) V8 - NRW Response NRW:01114553

Sion,

Thanks. I am include to agree with Emma that connection to the public sewer isn't feasible here. Whilst I am aware that cost is factor you would take into account, I think land ownership is the bigger issue here. The applicants don't own any of the land needed to connect to the nearest foul water drains and I think it highly unlikely an agreement with neighbouring landowners would agree – particularly as there was considerable opposition to this proposal when the planning application was being considered.

In my opinion I think that does leave us with the only option of accepting a private system and therefore determining what *type* of private system is appropriate. I fully understand the concerns with the proposed cess pits and I fully acknowledge that we would have no control over where foul water from them was treated and disposed once it was tankered off site. Emma has suggested a drainage mound. I will asked Building Control for some further advice – but I think it would also be useful to know if NRW would be agreeable to this type of system in principle .

Matthew Phillips

Pennaeth Dros Dro'r Gwasanaeth Polisi Cynllunio/Interim Head of Service Planning Policy
Cynllunio a Rheoleiddio/Planning and Regulatory



01978 298780

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From: Williams, Sion M. <Sion.M.Williams@cyfoethnaturiolcymru.gov.uk>

Sent: 02 March 2022 13:24

To: Matthew Phillips <Matthew.Phillips@wrexham.gov.uk>; Emma Broad <Emma.Broad@wrexham.gov.uk>

Subject: RE: P/2020/0239 - Land Adjacent to Graig Wen Farm, Off Brymbo Road, Bwlchgwyn, Wrexham (D.O.C 6, 7, 8, 9, 10 & 11) V8 - NRW Response NRW:01114553

Good afternoon both,

Nothing further to add to the below and our previous response. I also attach an email I sent in October regarding breakdown of costs. I would also reiterate that it would be prudent that the applicant liaises with the permitting department at NRW if they are to progress with a private drainage system.

Diolch,

Siôn M. Williams

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

In light of recent events, I am currently working from home and as such not contactable on the phone. If you need to get in touch, please email me and I will respond as quickly as possible.

Yn sgil y datblygiadau diweddaraf rwy'n gweithio gartref ar hyn o bryd ac felly nid mewn cyswllt ar y ffôn. Os oes angen i chi gysylltu, anfonwch e-bost ataf os gwelwch yn dda a byddaf yn ymateb cyn gynted â phosib.

From: Matthew Phillips <Matthew.Phillips@wrexham.gov.uk>

Sent: 15 February 2022 09:31

To: Williams, Sion M. <Sion.M.Williams@cyfoethnaturiolcymru.gov.uk>; Emma Broad
<Emma.Broad@wrexham.gov.uk>

Subject: FW: P/2020/0239 - Land Adjacent to Graig Wen Farm, Off Brymbo Road, Bwlchgwyn, Wrexham (D.O.C 6, 7, 8, 9, 10 &11) V8 - NRW Response NRW:01114553

Both,

See below. Is there anything further we can advise Trevor Mennell in terms of how he can firstly demonstrate a private system is the only option here and secondly an alternative to cess pit?

Matthew Phillips

Pennaeth Dros Dro'r Gwasanaeth Polisi Cynllunio/Interim Head of Service Planning Policy
Cynllunio a Rheoleiddio/Planning and Regulatory



01978 298780



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From: North Planning <NorthPlanning@cyfoethnaturiolcymru.gov.uk>

Sent: 24 January 2022 10:49

To: planning_admin <planning_admin@wrexham.gov.uk>

Cc: Edward Purcell <trevor@tmplanning.com>

Subject: P/2020/0239 - Land Adjacent to Graig Wen Farm, Off Brymbo Road, Bwlchgwyn, Wrexham (D.O.C 6, 7, 8, 9, 10 &11) V8 - NRW Response NRW:01114553

Good morning Trevor,

Thank you for your email.

Our concerns remain (from response ref: CAS-168256-C4Z1) with discharging condition 8. As Welsh Water have noted, the nearest mains sewer is within connection distance (approx 100m) we, therefore, advise that further information should be sought from the applicant in order to assess cost and practicality of connection. No costs have yet been provided, however, we note that confirmation has been sought from third parties.

As the site is within the catchment of the River Dee Special Area of Conservation (SAC), the Applicant should be aware that should a connection to the mains sewer not be feasible, they will also need to demonstrate that the proposal would not pose an unacceptable risk to the water environment. Therefore, with regard to the option of a cesspit, consideration must be shown of where the waste will be transported and ultimately received (which wastewater treatment

works). As previously noted we advise that the applicant begins liaising the permitting department at NRW at the earliest opportunity.

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

Kind regards,

Siôn M. Williams
Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales
Swyddfa / Office: Maes y Ffynnon, Bangor, Gwynedd

Siaradwr Cymraeg

In light of recent events, I am currently working from home and as such not contactable on the phone. If you need to get in touch, please email me and I will respond as quickly as possible.

Yn sgil y datblygiadau diweddaraf rwy'n gweithio gartref ar hyn o bryd ac felly nid mewn cyswllt ar y ffôn. Os oes angen i chi gysylltu, anfonwch e-bost ataf os gwelwch yn dda a byddaf yn ymateb cyn gynted â phosib.

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

Ewch i weld - mi fedrwch chi dalu, rhoi gwybod, gwneud cais, dweud eich dweud, a dod o hyd i wybodaeth ar-lein yn www.wreccsam.gov.uk. Arbedwch bapur - meddyliwch cyn argraffu!

Mae'r neges e-bost hon ac unrhyw atodiadau wedi eu bwriadu ar gyfer yr unigolyn neu'r sefydliad y'i cyfeirir atynt yn unig. Am yr amodau llawn ynglŷn â chynnwys a defnyddio'r neges e-bost hon, ac unrhyw atodiadau, cyfeiriwch at www.wreccsam.gov.uk/top_navigation/disclaimersw.htm

We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

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Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

Ewch i weld - mi fedrwch chi dalu, rhoi gwybod, gwneud cais, dweud eich dweud, a dod o hyd i wybodaeth ar-lein yn www.wreccsam.gov.uk. Arbedwch bapur - meddyliwch cyn argraffu!

Mae'r neges e-bost hon ac unrhyw atodiadau wedi eu bwriadu ar gyfer yr unigolyn neu'r sefydliad y'i cyfeirir atynt yn unig. Am yr amodau llawn ynglŷn â chynnwys a defnyddio'r neges e-bost hon, ac unrhyw atodiadau, cyfeiriwch at www.wreccsam.gov.uk/top_navigation/disclaimersw.htm

We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

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