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09/08/2021

Dear Mr Greenland,

**PROPOSAL: 6 GLAMPING PODS AND ASSOCIATED GROUNDWORKS**

**LOCATION: WHITEWELL, WHITCHURCH**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales with additional foul drainage information about the above, which we received on 29/07/2021. Our revised response is given below.

**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, you should seek further information from the applicant regarding protected sites. If this information is not provided, we would object to this planning application. Further details are provided below.**

#### **Protected Site – River Catchment**

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 21<sup>st</sup> January 2021, we published an evidence package outlining phosphorus 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 (or phosphorus) 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.

We note from the additional information submitted (Glampitect Drawing No. 200616-01-01/ and drainage report) that a proposed new foul drainage system for the development has the potential to increase the amount of phosphorus being discharged from the site.

From the calculations submitted, the applicants have applied the incorrect daily flow rate. The appropriate value is for the equivalent fully serviced caravan sites/ Holiday Camp Chalet (at 150l per person per day).

As a result, the daily input for any treatment plant for a maximum of 24 people should accommodate 3600l/3.60m<sup>3</sup> a day. This is however 1600l/1.60m<sup>3</sup> over the 2000l/2m<sup>3</sup> per day limit. The maximum number of cabins able to be sited is therefore 3 (maximum occupancy of 12) which brings the daily flow rate down to 1800l/1.8m<sup>3</sup>.

Given the reduced number of cabins/occupants, it does mean that the size of the soakaway may be reduced by 50% to 115.2m<sup>2</sup>. However, we advise that further assessments be made to assess the appropriate drainage system for the reduced number of cabins/occupants.

It is advisable that the applicant make new arrangements for this reduced number as well as submit detailed plans as to what type of treatment plant they intend to install on site. We would appreciate it if these updated plans are also submitted for our assessment.

We refer you to our [Planning Advice](#) and advise you to seek further information from the applicant.

Provided this advice is followed and you are able to conclude that the development is not likely to have a significant effect on the SAC, we would have no objection to the proposal. However, should you conclude that the proposed development is likely to have a significant effect on the SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

## **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).

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.

## **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.

### **Advice for the Developer**

#### **Foul Drainage:**

The Applicant should note, it is a legal requirement to apply for an environmental permit or register an exemption with us. Septic tanks and small sewage treatment works may be registered as exempt from the requirement to obtain an environmental permit if certain criteria are met. Please note, should a permit be required, further information may be required as part of that application and the Applicant is therefore advised to hold pre-application discussions with 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.

If the Applicant already holds an exemption / permit, they should check whether the proposed increase in flows would require a further application to be made for a new / varied permit. 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.

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

Yours sincerely,

**Joy Evans**

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