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11/03/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: 6 GLAMPING PODS AND ASSOCIATED GROUNDWORKS

LLEOLIAD / LOCATION: WHITEWELL, WHITCHURCH

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 17/02/2021.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirement. Otherwise, we would object to this planning application.

Requirement: Further information is required to demonstrate that the proposal will not pose an unacceptable risk to the water environment.

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 confirmed 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 site's qualifying features. We also issued Interim Planning Advice, which gives specific advice in respect of foul drainage arrangements for new developments.

We understand that the development is not served by the public foul sewer and that the application form indicates that foul drainage is to be discharged to a private sewerage system. In these circumstances Welsh Government Circular 008/2018 advises that a full

and detailed consideration be given to the environmental criteria listed under paragraph 2.6 of the Circular, in order to justify the use of private sewerage. In this instance, insufficient information has been submitted.

The application does not, therefore, provide a sufficient basis for an assessment to be made of the risks of pollution to the water environment arising from the proposed development.

In particular, the submitted application fails to show that disposal of foul effluent from the proposed package treatment plant would be effective at this location.

Requirement: Further information is required to demonstrate that the proposal will not pose an unacceptable risk to the water environment.

The proposed development is within the Worthenbury Upper Water Framework Directive (WFD) Waterbody, which is failing to achieve good status and at moderate status for phosphate according to the 2019 WFD classification. The site is also within the River Dee and Bala Lake SAC catchment, and has the potential to increase phosphate levels in the SAC. In view of this the following information is required:

- Details of the type of waste water treatment as well as the maximum daily sewage discharge rate arising from the glamping pods (this should be based on maximum occupancy, according to [Flows and Loads BW COP 18.11 14.pdf](#)). Depending on the maximum flow the discharge might be covered by a water discharge exemption or requiring an environmental permit. For further information please visit [Natural Resources Wales / Discharges to surface water / and groundwater](#) and/or contact the local environment team: WrexhamFlintshireEnvironmentTeam@cyfoethnaturiolcymru.gov.uk.
- In order to reduce the phosphate input to the watercourse, it would be advisable to add a tertiary system downstream of the wastewater treatment plant, such as a wetland system.

On receipt of the above information we will review our position and advise your Authority accordingly.

Should you conclude that the proposed development is likely to have a significant effect on the SAC, we look forward to being consulted 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.

Advice to Developer

The Applicant should be made aware that to operate a private sewerage system, they will need 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. 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.

We recommend the applicant reviews the following guidance in relation to the proposed development: -

- Guidance for Pollution Prevention 4 ([NetRegs website](#)) : Sewage treatment and disposal where there is no foul sewer (GPP4)
- [EPR \(Environmental Permitting Regulations\) Guidance](#)
- NRW guidance (May 2019): [How to run your household sewage treatment system well](#)

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,

Rhys Jones

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