



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-138223-W6V9
Eich cyf/Your ref: P/2021/0060

Maes Y Ffynnon,
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northplanning@cyfoethnaturiolcymru.gov.uk

10/03/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CONVERSION OF REDUNDANT BARN INTO 1 DWELLING

LLEOLIAD / LOCATION: TYDDYN DEDWYDD, RHOSTYLLEN

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 12/02/2021.

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

Requirement: (Foul Drainage) 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, specifically a new septic tank. 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, no 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 a septic tank would be effective at this location. The developer has not submitted any porosity/percolation testing results. Nor are there calculations for the specific size of any proposed soakaway(s) or the location of the discharge of foul effluent.

Therefore, we request that details of the location and size of the soakaway(s)/drainage field along with percolation test results, are submitted prior to the determination on the application.

Requirement 1 (Foul Drainage) further information is required to demonstrate that the proposal will not pose an unacceptable risk to the water environment.

The developer should ensure there is sufficient space to install the drainage field as set out in BS 6297:2007+A1:2008. On receipt of the above information we will review our position and advise your Authority accordingly.

The development has the potential to increase the volume or concentration of wastewater and associated phosphate levels being discharged within the catchment of the SAC. 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).

Advice for the Developer

Foul drainage

The Applicant should be 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.
Pollution Prevention

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages.

For further guidance please refer to GPP 5 and PPG 6 at the following link:
<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

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