

FAO Mared Rees-Jones

11/03/2019

Dear Mared,

TOWN AND COUNTRY PLANNING ACT 1990
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PROPOSAL:

Side and rear extensions and erection of garage.

LOCATION:

The Old Shop, Cadney Lane, Bettisfield, Wrexham

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 14/02/2019.

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 requirements. We would object if the scheme does not meet these requirements.

Summary of Requirement

Requirement: Foul Drainage: Submission of full details with respect to the method of foul drainage, which demonstrates that an acceptable method of foul sewage is achievable

Foul Drainage

We understand that the development is not served by the public foul sewer. In these circumstances WG 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 drainage facilities.

The application does not specify if the proposed development would connect to an existing or a new package treatment plant. It is noted that the site layout plan appears to indicate a treatment plant. Currently there is no registered exemption or active environmental permit for a water discharge to ground via a soakaway at the Old Shop. It is a legal requirement for all water discharges in Wales to be registered with NRW, some discharges may require an environmental permit, depending on type, volume and location of the discharge.

The area does not benefit from a public sewerage system and it is also generally unsuitable for both septic tanks and private treatment works discharging to a soakaway or watercourse (proliferation of discharges to soakaway and insufficient dilution in the watercourse as it dries up in Summer months). In addition, any proposals for discharge to sealed cesspits/cesspools would pose significant risks to the local environment and controlled waters. As such, we have significant concerns and recommend that you should only grant planning permission if the scheme can meet the following requirement:

Requirement: Foul Drainage: Submission of full details with respect to the method of foul drainage, which demonstrates that an acceptable method of foul sewage is achievable

Further details of the type of sewage treatment, specifically the type of soakaway and porosity test results for the soakaway, should be submitted to NRW for consideration.

Should no further information be received, or such information does not demonstrate that an acceptable method of disposal of foul sewage can be achieved, we object to the proposals and recommend that your authority refuse the planning application.

Protected Species

We note that there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

Please do not hesitate to contact us if you require further information or clarification of any of the above.

Our comments above only relate specifically to matters that are listed in our 'Consultation Topics' document (September 2018) which is published on our website: (<https://cdn.naturalresources.wales/media/686847/dpas-consultation-topics-august-2018-eng.pdf?mode=pad&rnd=131819256840000000>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

Advice to Applicant

Foul Drainage

The Applicant should be aware that to operate a non-mains drainage system, they will need to apply for an environmental permit or register an exemption with us. The Applicant must obtain any necessary permit or exemption prior to commencement of work on site. Septic tanks and small sewage treatment works may be registered as exempt from the requirement to obtain an environmental permit if certain criteria is 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. 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 Standards 6297 and Approved Document H of the Building Regulations. We also refer the Applicant to [Pollution Prevention Guideline 4](#) which provides further information.

Pollution Prevention

All works at the site must be carried out in accordance with PPG6: 'Working at construction and demolition sites' which are available on the following

website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

During the construction phase the developer should take any precaution to prevent contamination of surface water drains and local groundwater. 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 visit <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/> .

Waste

Waste produced during the construction phase of your development must be dealt with appropriately and be in line with all relevant waste legislation including Duty of Care Regulations and Hazardous Waste Regulations. As part of your waste duty of care you must classify the waste produced:

- before it is collected, disposed of or recovered
- to identify the controls that apply to the movement of the waste
- to complete waste documents and records
- to identify suitably authorised waste management options
- to prevent harm to people and the environment.

Any waste removed from site will be subject to waste management controls. The links below provided information on how to classify waste and register as a waste carrier or hazardous waste producer:

<http://naturalresources.wales/waste/how-to-classify-and-assess-waste/?lang=en>

<http://naturalresources.wales/apply-for-a-permit/waste/?lang=en>

Further guidance can be found on the GOV website here:

<https://www.gov.uk/managing-your-waste-an-overview/duty-of-care>

The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their

development.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales