APPEAL REF:-

CAS-033990-W2G2H2

LAND SOUTH OF TYN-Y-COED, MOSS ROAD, GWERYSYLLT LL11 6HA

ADDITIONAL INFORMATION REQUESTED BY PEDW WALES IN ORDER TO CARRY OUT HABITATS REGULATIONS ASSESSMENT (HRA)

TO BE READ IN CONJUNCTION WITH RESPONSE FROM MR E LOMAS MSL CAMLAD ECOLOGY *(Appendix 1)*

By Trevor Mennell

Trevor Mennell Planning

1.0 Introduction

1.1 The Drainage Scheme has been designed in accordance with Welsh Government Circular 008/2018, Building Regulations along with advice from both Welsh Water Ltd and National Resources Wales.

1.2 Porosity Tests *(Appendix 2)* have been carried out. Welsh Water correspondence was received on 28th November 2023 *(Appendix 3).*

2.0 Information that will allow the development to be screened out

2.1 Information that will allow the development to be screened out as not likely to have a significant effect on the River SAC in relation to phosphorous inputs as there is unlikely to be a source of additional phosphorous or pathway for impacts.

2.2 Item D:-

The proposal is to install a Bio-Disc private sewage treatment system discharging treated domestic wastewater to ground built to the relevant British and European Standards. The system is manufactured by Clenviro Ltd and certificates of compliance with the necessary standards to satisfy NRW together with an effluent breakdown by percentage and showing a virtually NIL phosphate output.

2.3 Also:-

I. Confirmation calculations that the treated discharge from 2 no. pitches is at a rate less than 2 cubic metres/day. A plan is attached showing the foul drainage layout (Plan Ref: 71395:1004) and location of the drainage field which is located more than 40m from any surface water feature.

3.0 Connection

3.1 The proposal does not involve connecting to a <u>public</u> wastewater treatment works.

4.0 Private Sewage Treatment System

4.1 A private sewage treatment system is proposed within a sewered area

4.2 The public sewer, a Welsh Water Ltd asset is located some 20m from the site boundary. I have personally written to Welsh Water relative to the possibility of a connection and have received the attached response dated 26th April 2024 *(Appendix 4)*. However, from my own experience having dealt with gypsy and traveller sites

within the countryside in excess of 15 years, I consider a connection to the sewer is not a viable option:-

I. To access the sewer the need to cross both privately owned land and highway land, the sewer is within the highway which involves excavating the road and footpath in order to make a connection.

II. The owner of the adjoining land is not in agreement for my client to access the field for this purpose.

III. The invert levels will not permit a gravity connection.

IV. If a connection was to be made by pumping, to carry out the connection there would be disruption to traffic and houseowners on the housing estate abutting the highway as a road closure would be required.

V. The Welsh Water Five Fords Sewage Treatment Works at Wrexham is currently being assessed by NRW relative to its licensed discharge standards entering the River Dee not being met by Welsh Water.

VI. The cost of carrying out the formalities of making the relative connection application, highway crossing, private owners compensation, solicitors fees, architect / engineers fees are out of financial reach of my client, a single mother who is on benefit with little savings bringing up seven children.

VII. To actually install a septic tank and drainage field together with accompanying drainage supervised by Building Control has been costed at £10,000 ota where to install manholes and drain runs in accordance with “Sewers for Adoption” standards inclusive of all reinstatements would be in excess of £50,000 and the further possibility of the installation of a pumping station.

VIII. The installation of a bio-disc can be carried out immediately without the administrative delays attributed to making a formal connection to the sewer.

IX. The water authority have powers to cross private land, however, I am advised by Welsh Water these powers come into use for large type developments and would prove very costly for a small site of 2 no. caravan pitches.