



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-194694-L4D0
Eich cyf/Your ref: P/22/0192

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23/08/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: Provision of 29 camping pods, changing village, vehicle workshop, children's play area and associated access, drainage and landscape infrastructure

LLEOLIAD / LOCATION: Gethin Woodland Centre, A470 Pentrebach to Rhydyar Northbound, Abercanaid, Merthyr Tydfil, CF48 1YZ

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 28 July 2022.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following conditions to any planning permission granted:

- Scheme for foul drainage
- Construction Environmental Management Plan

Please note, without the inclusion of these conditions we would object to this planning application. Further details are provided below.

Foul Drainage

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.

We have considered the Drainage Strategy Report by Bingham Hall Partnership Ltd, reference 6655-00-XX-RP-C-001, dated May 2022 Rev H, and note that two potential methods of foul effluent discharge are being considered by the applicant.

- *“Option (C) (ii) Either a septic tank or packaged treatment plant with an outfall to a watercourse, effluent treated to 20 (BOD)/30 (Suspended Solids) 20 (NH3) quality. This option is to be approved and consented by Natural Resources Wales.*
- *Option (D) A cesspool with a capacity of 45 days foul effluent inflow. This option is to be approved and consented by Natural Resource Wales.*

We note the applicant's preferred option is Option (C) (ii) however, due to the uncertainty of the method of foul drainage and the possibility to install a cesspool, we request that the following condition is attached to any permission granted:

Condition:

No development shall commence until a drainage scheme for the disposal of foul drainage has been submitted to and approved in writing by the Local Planning Authority.

The drainage scheme shall be carried out in accordance with the approved details.

Justification: A drainage scheme should be submitted to ensure necessary measures are approved prior to commencement of development and implemented to protect the water environment and public amenity.

NRW Advice on Cesspools

Please note that Natural Resources Wales (NRW) does not consent or approve the installation or use of cesspools.

Within the “Approach to Groundwater Protection” guidance (issued by the Environment Agency in 2018 and adopted by Natural Resources Wales), Position Statement G6 states ‘Natural Resources Wales does not encourage the use of cesspools or cesspits, other than in exceptional circumstances. A cesspool or cesspit is a sealed unit that is used for the storage of untreated sewage. There must be no discharge to the environment. Poorly managed cesspools and cesspits present a considerable risk of causing pollution, which can be difficult to monitor and correct.’

In exceptional circumstances, where a cesspool/cesspit can be justified, the Welsh Government Circular 008/2018 (July 2018) advises that a full and detailed consideration be given to the environmental criteria listed under paragraph 2.6.

It is essential that any cesspool/ cesspit is installed correctly. Incorrectly maintained cesspools can cause pollution by contamination the ground, groundwater and, sometimes surface water. Any damage to the fabric of the cesspool, such as cracks or holes, is difficult to detect but needs to be rectified immediately in order to prevent pollution. The cesspit should meet the requirement of British Standard BS 6297. It should be fitted with a level warning device to indicate when the tank needs emptying.

Environmental Permitting Advice for the applicant

The applicant should apply for an environmental permit from NRW for any proposed package treatment plant or septic tank at the earliest opportunity. 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). Please be aware, we cannot rule out that it may be necessary to change the proposed layout on site, as a result of permit requirements. Therefore, again we urge the Applicant to engage with our Permitting Team at the earliest possible opportunity, to try to ensure that there is no conflict between any planning permission granted and permit requirements. 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

Due to the sensitive location of the proposed development in proximity to a watercourse, we advise that a condition for a Construction Environment Management Plan (CEMP) should be attached to any permission granted:

Condition:

No development shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

The CEMP should include:

- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Control of Nuisances: details of dust control measures.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details.
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

The CEMP shall be implemented as approved during the site preparation and construction

phases of the development.

Justification

A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction.

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.

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

Yn gywir / Yours faithfully

Claire McCorkindale

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