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FAO: David Cross

15 April 2019

Annwyl Syr/Madam / Dear Sir/Madam

Provision of 36 camping pods and 5 chalets, erection of shower/toilet block and creation of play and picnic area. Construction of new parking area (141 spaces) with overflow carpark (85 spaces), together with a trail maintenance yard, new highway access routes, ground profile works, drainage, infrastructure and landscape works at Bike Park Wales, Gethin Woodland Centre, Abercanaid, Merthyr Tydfil, CF48 1YZ

Thank you for referring us to the application above, which we received on 28 March 2019.

We provided pre-application advice to the applicant in a letter dated 04 February 2019. We have reviewed the submitted Pre-Application Consultation Report supporting this application. We have also reviewed the additional information that was submitted in response to our letter, dated 04 February 2019.

We continue to have significant concerns with this application. We recommend that you should only grant planning permission if you attach the following condition. This condition would address significant concerns that we have identified and we would not object provided you attach it to the planning permission.

Condition- A foul drainage scheme to be agreed.

Foul Drainage

We have reviewed the following documents in order to provide you with technical advice on the proposed foul drainage on this site.

- Letter addressed to H Griffiths, produced by Bingham Hall Partnership Ltd, dated 01 March 2019.
- Drainage Strategy Report, produced by Bingham Hall Partnership Ltd, dated March 2019.

- Drainage strategy drawing titled 'Proposed Site Wide External Works Scheme', dated 19 November 2018 (Revision G).

In our response to the statutory pre-application consultation, we required further information regarding the foul drainage arrangements and we set out four separate requirements. The applicant has addressed some of these, as explained below.

Requirement 1

We understand that the intention is to connect the new camping pods and lodges to a new foul drainage system that will discharge to ground. However, at this stage the exact design of the system is not known. We also understand that the intention now is to connect the new toilet and shower block to this new foul drainage system. This is an update from what was presented previously and we welcome this change.

Requirement 2

As stated above, the design of the foul drainage system is yet to be finalised. However, the applicant is proposing a foul drainage system that will discharge to ground via a soakaway. During a recent site visit, the applicant was advised by one of our Officers to undertake percolation testing at the location where the soakaway is proposed, in order to establish whether this option can be pursued. If a soakaway proves not to be feasible, there are other foul drainage solutions available, which may include reed beds and so on, however insufficient information has been submitted at this stage to allow us to advise further.

The applicant is advised that there will also need to be a grease trap installed. Any fat and grease passing through the new system into the soakaway would be detrimental.

Requirement 3

We note and welcome confirmation that the final design of the foul water treatment facility will include a provision to counter fluctuating loads.

Requirement 4

The applicant had not previously included a provision for the motor home foul waste disposal. We now understand that the applicant proposes for the motor home waste to enter the new proposed system. However, this is not acceptable. No chemical waste should enter the treatment plant; this waste needs to be stored in a sealed cesspool and tankered away.

As indicated above, I can confirm that one of our Environment Officers has been to the site to meet with the applicants and discuss a way forward with regards to foul drainage. As you will be aware, in addition, to planning permission, a new foul drainage system at this site will require a permit to discharge. As a part of obtaining this permit, the applicant will have to demonstrate compliance with existing permits on site and that the existing systems have been (and will continue to be) able to cope with the increase in footfall that has been experienced on site. The applicant has been advised 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, as the grant of planning permission does not guarantee a permit will be granted.

In consideration of the above and the ongoing work required by the applicant to find a suitable foul drainage solution, **we are satisfied that our remaining concerns can be dealt with provided a suitably worded condition for approval of a foul drainage scheme is attached to any future permission granted by your Authority.** 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.

Further advice to applicant

The following information is included to aid with ongoing work required in order to design a new system and the associated permit application.

We are aware that you have been advised to keep monitoring data of existing discharges and abstractions on site. You should be monitoring your abstractions daily. As you do not have a meter for your discharge, the abstraction readings can be used to demonstrate compliance with the existing discharge permit. Demonstrating compliance with your current permit will be important for future permit applications.

We advise that some information within the Drainage Report Strategy is incorrect. Section 4.2 states that the numeric conditions on the PTP is BOD 20mg/l, Solids 30mg/l, Ammonia 20mg/l. This is incorrect. The numeric value for Ammonia is 5.45mg/l.

Please note, the Bike Wash holds a trade permit with numeric conditions of 2.5m³/d, 10mg/l Solids, and 6-9pH.

Some information used for the calculations, as included in the submitted letter, will need to be amended when submitting calculations as a part of a permit application, they are as follows;

- Existing catering facilities/visitor centre - The calculations used seem to be based on the initial estimations of footfall (2013- 200 visitors), whereas the footfall for the site has far exceeded this (1,000+ during an event). You will need to use realistic footfall rather than initial estimations in your calculations.
- The five chalets appear to have been underrepresented within the calculations. Our understanding is that these will have three bedrooms, two bathrooms (one shower, one bath) with self-catering facilities. It is not clear if these will have a maximum occupancy of 6 or whether there also be a sofa bed in the living area taking up the maximum occupancy to 8. This needs to be clearly set out and included in calculations.

The following advice does not fall part of the above significant concerns but is included here for your information;

European Protected Species (EPS)

We have reviewed the '*Ecological Impact Assessment Report, Land At Bike Park Wales, Merthyr Tydfil. Bike Park Wales. DOCUMENT REF: WWE18125 ECIA REV A*', produced by Wildwood Ecology, dated 4 October 2018, which is contained within the Appendices for Chapter 6 of the Environmental Statement. Based on that information, we have no objections to the proposal from an EPS perspective. We note and welcome the recommendations made within section 5 of this report and advise that these are discussed further with the Local Authority's Ecologist, to ensure they are implemented.

Water abstraction

We understand that the site's water is supplied by a borehole. An abstraction license may be needed to accommodate an increase in demand for water supply. We advise that you discuss this with our Water Resources licensing team at the earliest opportunity.

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, including environmental interests of local importance. We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents relevant to their development. Please refer to our [website](#) for further details.

If you have any further queries, please don't hesitate to contact us.

Yn gywir / Yours faithfully

Helen Griffiths

Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor
Cyfoeth Naturiol Cymru | Natural Resources Wales

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy. | Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi. | Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.