



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-213250-S3X8
Eich cyf/Your ref: DM/2022/01498

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20/04/2023

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: VARIATION OF CONDITION 6 OF PLANNING CONSENT DC/2010/00626. (THE SITE SHALL NOT BE USED OTHERWISE THAN AS A TOURING CARAVAN AND CAMPING SITE WITH A MAXIMUM NUMBER OF 20 IN TOTAL OF CARAVANS OR TENTS TO BE ACCOMODATED AT THE SITE.) TO ACCOMMODATE AN ADDITIONAL 4 SHEPHERD HUTS WITH ASSOCIATED WASHING FACILITIES.

LLEOLIAD / LOCATION: GREAT TREADAM FARM, OLD ROSS ROAD FROM TREADAM TO LLANTILIO CROSSENNY, LLANTILIO CROSSENNY, MONMOUTHSHIRE.

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 21/03/2023.

We have no objection to the proposed development as submitted and provide the following advice.

Foul Drainage and Designated Sites

We note the application site is within the catchment of the River Wye Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (July 2022), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments.

We note from the information submitted that the applicant is seeking to separate foul effluent from the existing development and proposed development. It is proposed to use both a new septic tank to ground to provide foul drainage for the 20 caravans approved under DC/2010/00626 and the existing Package Treatment Plant (PTP) which eventually discharges to a nearby watercourse to provide foul drainage for 4 new glamping pods and 4 new shepherd huts.

We have reviewed the following documents submitted in support of this application:

- Sewage Treatment/Outfall Installation Assessment (ref: 2152) dated 13/10/2022
- Non-mains Sewerage Arrangements/Percolation Test Results (ref: 2152) dated 28/09/2021)

Within the Sewage Treatment/Outfall Installation Assessment, it is noted that within the current approval under DC/2010/00626, a daily sewerage output of 13600 litres (13.6m³) a day to the watercourse was advised. The current proposal would involve a reduction of 2000 litres (2.0m³) a day from the approved sewage output and a related reduction in phosphorus output. Therefore, whilst the additional proposed Glamping Pods and Shepherds Huts within the current application would provide an additional 600 litres (0.6m³) a day of sewerage output, we would have no objection since the proposal would result in an overall reduction of sewerage output of 1400 litres (1.4m³) a day which would also see a reduction in the amount of phosphorous discharged into the watercourse.

We note from the Sewage Treatment/Outfall Installation Assessment that the proposed drainage field of the proposed septic tank 'is sited outside a 200m exclusion zone for the drainage field serving Great Treadam Farmhouse, and also outside the 40m exclusion zone of the water course to the east of the drainage field'. We also note the proposed septic tank is located more than 50m from the River Wye SAC boundary and more than 40m from any surface water feature such as a river, stream, ditch or drain.

We have also reviewed the Non-mains Sewerage Arrangements/Percolation Test Results submitted in support of this application for the installation of a septic tank drainage to ground. Based on this information submitted and considering that the proposed septic tank drains to ground and does not discharge more than 2.0m³/day, there is unlikely to be a pathway for impacts to the SAC river. As such, we consider the proposal would be suitable at its location and we would have no objection.

However, ultimately it is a matter of judgment for you, as Competent Authority, to satisfy yourselves that the proposed development will not result in a significant effect on the SAC. Therefore, should your Authority conclude that the proposal is likely to have a significant effect on the River Wye SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

In addition to the above, please note the red line boundary as shown on the location plan of the current application does not appear to include the drainage field of the proposed septic tank. You should satisfy yourself that proposal's sewerage infrastructure is included within the application site prior to determination.

Applicants wishing to operate a private sewerage system will need either to apply to us for an environmental permit or register with us for an exemption from the permit requirement. Septic tanks and small sewage treatment works that meet certain criteria may be registered as exempt. We note it is stated in the Sewage Treatment/Outfall Installation Assessment that the 'The Application site benefits from an Existing Natural Resources Wales Water

Discharge Exemption Ref: NRW-WQE072133 for 5m³ to water, and the re-assessed output is within exemption allowance'. However, the applicant would still be required to apply for an environmental permit or register for an exemption for the proposed septic tank.

A step by step guide to registering an exemption can be found on our [website](#).

If the septic tank or private sewage treatment system is not eligible for an exemption, the Applicant will need to apply for an environmental permit, further details can be found [here](#). Should a permit be required further information may be needed as part of that application process. The Applicant is therefore advised to contact us for pre-application advice at the earliest opportunity to try to ensure that there is no conflict between any planning permission granted and the permit requirements. Further details on how to access our pre-application advice service can be found [here](#).

It is important to note that a grant of planning permission does not guarantee that a permit will be granted. A proposal may be deemed unacceptable either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible. Applicants are encouraged to ensure they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site.

Please note, lack of capacity or plans to improve capacity in the sewer is not a valid reason for a sewerage undertaker to refuse connection under Section 106 of the Water Industry Act 1991 and we may refuse to issue an environmental permit for private treatment facilities in such circumstances.

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.

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.

Advice for the Developer

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 Guidance for Pollution Prevention 5: Works and maintenance in or

near water, and Pollution Prevention Guidelines 6: Working at construction and demolition sites, which are available on the [NetRegs website](#).

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

Yn gywir / Yours faithfully

Frances Holms

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