

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: Mr Scott Hardacre
7 Ashtree Close
Woodsy Close
Cardiff Gate Business Park
Cardiff
CF23 8RW

Application number: PAN-004772

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, dated 14th March 2019. The information requested should be sent to the following address by 18th June 2019.

Information should be sent to:

Wales Permitting Centre
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
Katrin Raynor-Evans	7th May 2019

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 03000 654 427
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Katrin.raynor-evans@naturalresourceswales.gov.uk

Canolfan Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP

Wales Permitting Centre (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

Schedule

Following consultation with the Geoscience and Natural Resources Management teams, the application to vary permit EPR-AB3294CP has raised concerns with regard to the risk to the groundwater environment due to the failing of the current soakaway system.

Please address the following:

1. What is the specific problem with the current system?
2. Please confirm how surface water from the properties is dealt with and that it does not enter the treated effluent soakaway system. Correspondence with the residents suggests that surface water from one of the properties has been piped very close to the soakaway system.
3. Can you confirm that the existing soakaway will be used in the new design? It is not clear from drawing 14127-SK1001 what the proposed system is. The plan shows the sewage treatment system, the reed bed and an overflow coming from the reedbed and separately to a new soakaway located under the access road. The current soakaway that is being used at the moment is not marked on the drawing.

In an email dated 29th March 2019 regarding the proposed system it was stated that 'water will still pass through the existing soakaway, however any water that does not drain will then pass to the crates. The new system has been designed with capacity to make the existing soakaway completely redundant, and so the (albeit limited) capacity of the existing system adds to the capacity of the new design. If, for whatever reason, you would prefer to make the existing soakaway redundant, we could design the system to work in this way.'

It is not clear from this statement what the future of the existing soakaway is.

4. Please include details of how many trial pits were dug and mark the locations on a map.

- 14127 – Treated sewage effluent soakaway calculations references TP4 and TP5. Is this data from the previous application or is it new?
- As the proposed new soakaway system does not meet current British Standards, we cannot assess the impact using our Level 1 risk assessment model, so we cannot determine if the proposed discharge will have an adverse impact to groundwater. To demonstrate that pollution of groundwater will not occur at this location we require you to carry out and submit your own groundwater risk assessment. This should be undertaken in accordance with the Environment Agency's Horizontal guidance H1 - Annex J 4. We require that the risk assessment for the discharges from the proposed system is based on actual site-specific data. It is likely that we would also insist on down-gradient monitoring of the groundwater to ensure there is no pollution to groundwater should a permit be issued. As part of the assessment we would ask to see where the monitoring boreholes would likely to be installed.

5. Consider the construction of a new drainage field designed to meet the requirements of British Standards 6297:2007 + A1:2008. You will need to supply percolation results as per the British Standards and calculations of the size of the infiltration system. If you want to change your proposal to a package treatment plant to British Standard infiltration system please complete percolation tests in accordance with the 'Code of Practice for the design and installation of drainage fields for use in wastewater treatment' and then complete an Appendix 2 of Part B6.5 application form found on our website.

6. Given the increase in the volume, the cost-benefit analysis for the mains connection at the site should be re-submitted. Due to the on-going environmental risks and management issues of the treatment system, re-consideration of connection to main sewer is highly recommended in the long-term.