

Ein cyf/Our ref: CAS-276436-R8M6
Eich cyf/Your ref: P/2021/0060

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 19 March 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: 6 POD GLAMPIO A GWAITH DAEAR CYSYLLTIEDIG / 6
GLAMPING PODS AND ASSOCIATED GROUNDWORKS**

**LLEOLIAD/LOCATION: Church Holding, Whitewell Church Lane, Whitewell, Wrexham,
SY13 3AN**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 11 March 2025.

We continue to have concerns with the application as submitted. To overcome these concerns, further consideration is required regarding foul drainage. Further details are provided below.

Foul Drainage and Protected Sites

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). In line with our [Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation \(28 June 2024\)](#), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

The report submitted with the application ('Phosphate Reduction Calculation and Proposal' ref J16289 produced by Viltra) confirms that, once the site is fully developed, the maximum daily discharge rate would be 4.5 cubic metres (m³). Please note, our [Planning Advice](#) states that developments with a maximum daily discharge rate of less than 2 cubic metres (m³) can be screened out.

Phosphorous reduction technology has been proposed in the package treatment plant (PTP) to reduce the amount of phosphorous in effluent being discharged to ground. We advise that there is no additional benefit of installing phosphate stripping where the system is discharging to ground. Furthermore, chemical dosing has the effect of producing large

volumes of sludge that would need disposal as well as the impact of the chemicals used when ultimately spread to land following treatment at a wastewater treatment works.

We note from the information submitted that it is proposed to combine the discharge from the proposed glamping pods and the existing dwelling within a new PTP and subsequent discharge to ground via a drainage field.

Where a new drainage field is proposed in close proximity to other known existing and proposed drainage fields, there is a risk of the effectiveness of the drainage field(s) being compromised. Poor operation of drainage fields can lead to increased phosphorus discharges to SAC river systems. We therefore advise Planning Authorities to consider site conditions (such as proximity to adjacent drainage fields, soil type, depth to groundwater, and distance to surface water features and SAC boundary) to determine with certainty that existing and proposed drainage fields will operate effectively in the future and prevent any increase in phosphorus from entering a river SAC. Planning Authorities may wish to refer to advice on groundwater risk assessments to inform any technical assessments: [Groundwater risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit)

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. However, we are satisfied that our concerns can be overcome by your Authority following our [Advice](#) specifically the section titled '*What does this mean for development proposals involving connection to private sewage treatment systems?*'

We therefore advise you to take the above into account in your determination of whether the development is likely to have a significant effect on the SAC. Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity.

Flood Risk

We have no objection to the application on flood risk grounds as submitted.

Our Flood Risk Map confirms the application site lies partially within Zone C2 of the Development Advice Map (DAM) contained in TAN15 (internal access road) and also partially within Flood Zones 2 & 3 (Rivers) of the Flood Map for Planning.

Given the location of flood risk shown to be affecting the application site (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks to these areas.

The Iscoyd Brook runs along the southern boundary and appears to be culverted to form the existing access. We recommend you consult your internal flood risk advisors with regard to site access/egress and to ascertain whether there are any known operational issues with the brook.

Protected Species

We note that the ecological report submitted in support of the above application (Marshall, P., July 2021, Ecological Appraisal, ref: 21-05 163.1R, Greenscape Environmental)

identified that bats were not present within the building to be demolished and that no amphibians were found on site.

The site survey and report were completed in 2021. The report states "*Reports are considered valid for one year for planning purposes, after which time further survey information may be required*". We therefore advise that you liaise with your own Authority's ecologist regarding the need for an updated survey.

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,

Rachael Burke

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

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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.