

Ein cyf/Our ref: CAS-244674-P0Q8
Eich cyf/Your ref: P/2023/0803

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 22 December 2023

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Gosod pedwar caban gwyliau/ Siting of four holiday cabins

**LLEOLIAD/LOCATION: Land to The East of Park Lane Court, Lower Park Lane,
Rossett, Wrexham, LL12 0BQ**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 11 December 2023.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding Foul drainage and Flood Risk. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Sites – Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphate levels for all river SACs across Wales. In line with our [Planning Advice](#) (August 2023), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note from the information submitted that a new private sewage treatment system discharging domestic wastewater to watercourse (Daisy Land Drain) is proposed and therefore the development has the potential to increase the amount of phosphorus being discharged from the site. While most of the information as set out in the section titled 'What does this mean for development proposals involving private sewerage treatment systems' of our Planning Advice has been submitted with the application the specific discharge location is not shown. As such, we advise you to seek further information from the applicant.

We also advise that further site investigations will be required to confirm the definitive route of the Daisy Lane Drain. See our Flood Risk section below for further advice.

We advise the Applicant make use of our [pre-application advice service prior to applying for an Environmental Permit](#), to try to ensure that there is no conflict between any planning permission granted and the permit requirements. 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). 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.

Should you conclude that the proposed development is likely to have a significant effect on the SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Flood Risk

The planning application proposes highly vulnerable development for the siting of four holiday cabins. The application site falls partially within Zone C2 of the Development Advice Map (DAM) contained in TAN15 (2004).

However, at this location the Flood Map for Planning (FMfP) is the best available information on flood risk. The FMfP identifies the application site to be in Flood Zone 1, meaning there is less than a 0.1% chance of flooding in a given year.

Nevertheless, the site appears adjacent to Daisy Lane Drain (culverted), a designated main river. As noted above within the Protected Sites - Foul Drainage section the definitive route of this section of river, which is culverted, is unknown. We therefore advise that further investigations in the form of a CCTV surveys be undertaken to trace the route of the river and to inform the proposed discharge location for the proposed private sewerage treatment plant.

This survey would also allow an assessment as to whether a Flood Risk Activity Permit (FRAP) would be required for the development. A FRAP is normally required for any works within 8 metres of the river. We refer you to our [website](#) for further advice.

Protected Species

Our records show there may be protected species in the vicinity of the site (bats and great crested newts).

We note that there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

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

Sara Thomas

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

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

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.