

Ein cyf/Our ref: CAS-268796-G4T4
Eich cyf/Your ref: P/2023/0803

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 28 November 2024

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) with additional information about the above, which we received on 19 November 2024.

We continue to 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. 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). 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. 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 a watercourse (Daisy Land Drain) is proposed and therefore the development has the potential to increase the amount of nutrients being discharged from the site. We note that the information as detailed in the 'What does this mean for development proposals involving private sewerage treatment systems' of our Planning Advice has been submitted with the application.

Nevertheless, the site appears adjacent to Daisy Lane Drain, a designated 'main river'. The definitive route of this culverted section of river is unknown. We therefore advise that further investigations in the form of a CCTV survey be undertaken to trace the route of the river and inform the proposed discharge location for the proposed private sewerage treatment plant.

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.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. 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.

Protected Species

We note that the ecology report submitted in support of the above application (Preliminary Ecological Appraisal for Proposed holiday lodges at land adjacent to Park Lane Court, Parkside, Rossett by Marches Ecology dated 12.06.2024) did not find evidence of protected species at the application site. However, the report does include recommendations in relation to Reasonable Avoidance Measures for Great Crested Newts and lighting for bats, which we advise are secured to the satisfaction of your Authority, should planning permission be granted.

Flood Risk

The planning application proposes highly vulnerable development (residential). 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. We therefore have no further comments regarding flood risk.

Flood Risk Activity Permit (FRAP)

Please advise the Applicant that the Environmental Permitting Regulations (2016) require them to obtain a bespoke Flood Risk Activity Permit for any works or structures located in,

under, over or within 8 metres of the bank top of the Daisy Lane Drain, a designated “main river”. Further advice and guidance is available on our website: <http://www.naturalresources.wales/permits-and-permissions/flood-risk-activities/flood-risk-activity-permits-information/?lang=en>

The survey advised above in the Protected Sites – Foul Drainage section would also enable confirmation as to whether a FRAP would be required for the development.

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

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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.