

Ein cyf/Our ref: CAS-264277-M4G5
Eich cyf/Your ref: P/2024/0210

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 08 October 2024

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Newid defnydd tir I safle glampio (codl 2 gaban dros dro) gyda gwaith tirlunio a pharcio cysylltiedig / change of use of land to glamping site (erection of 2 no temporary huts) with associated landscaping and parking

LLEOLIAD/LOCATION: Gronwen Farm, Garth Trevor Road, Garth, Llangollen, Wrexham, LL20 7UY

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information regarding the above, which we received on 12 September 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

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.

Foul water disposal is proposed via the installation of a package treatment plant with discharge to ground within a sewered area. In this instance, we are satisfied that sufficient information has been provided by the Applicant (within your email dated 12/09/24) as part of this planning application to justify the use of a private sewerage system within a sewered area.

However, we note from the information submitted that the development has the potential to increase the amount of nutrients being discharged from the site. As such, we refer you to our [Advice](#) and advise you to seek further information from the applicant. We note that information has already been submitted in respect of confirming discharge to ground and that the percolation results indicate this is feasible. However, we advise you to seek further information as identified in the section titled '*What does this mean for development proposals involving private sewage treatment systems*' of that Advice.

In particular, the following information should be submitted:

- Confirmation that the system as a whole would be built to the relevant British Standard (BS 6297:2007+A1:2008) – this includes construction details of the drainage field as well as the tank itself.
- Confirmation that the proposed system would be at least 50m from any other known discharge to ground – this includes information relating to the location of any other existing private drainage systems at Gronwen Farm.

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.

Landscape

The development is situated within 90m of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) / National Landscape. We note that there is no information regarding landscape assessments with the application and therefore, we are assuming that your Authority has screened the application and concluded that any impacts on landscape are unlikely and the proposal is in line with [Planning Policy Wales](#). If you require further advice, then please reconsult us.

Protected Species

We note that the bat report submitted in support of the above application (HEC, February 2024. Phase 1 Ecological Survey - Extended) has identified that bats are likely to be present at the application site (foraging and commuting). From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document 'Natural Resources Wales Approach to Bats and Planning (2015)'. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

As this is a lower risk case for bats, we consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Furthermore, we advise that the proposed development is not likely to harm or disturb the bats or their breeding sites and resting places at this site, provided the avoidance measures described in the bat report are implemented.

We would welcome including the report in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Please consult us again if any further information shows that this is no longer a lower risk case.

Advice for the Developer

The information submitted in support of the application does not confirm whether the Applicant has carried out any pre-application consultation with NRW's permitting service in relation to an application for an Environmental Permit or exemption. We therefore advise that if the applicant has not undertaken consultation with our Permitting Team, they should do so at the earliest opportunity to try to ensure that there is no conflict between any planning permission granted and the environmental permitting requirements. The Applicant should note that a grant of planning permission does not guarantee a Permit or exemption will be granted. Notwithstanding a grant of planning permission, a proposal may be deemed to be unacceptable (e.g. because the permitting application process identifies an unacceptable environmental risk or because there is a feasible connection to mains sewer).

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.

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.