Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-289924-Y6Z0
Eich cyf/Your ref: P/2025/0737

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 23 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: ERECTION OF 3 NO GLAMPING PODS, FORMATION OF VEHICULAR ACCESS, INSTALLATION OF PACKAGE TREATMENT WORKS AND ALL ASSOCIATED WORKS

LLEOLIAD/LOCATION: LAND AT ERW GERRIG, TREGEIRIOG, LLANGOLLEN, WREXHAM, LL20 7HS

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 07 October 2025.

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 protected sites and foul drainage. If this information is not provided, we would object to this planning application. Further details are provided below.

We also advise that based on the information submitted to date, the document identified below should be included in the approved plans and documents condition on the decision notice. Without the inclusion of this document, we would object to this planning application.

- **Preliminary Ecological Appraisal, Land at Erw Gerrig, Tregeiriog, Llangollen, LL20 7HS by Arbor Vitae 07 May 2025**

Protected Sites

Special Area of Conservation (SAC)

The application site is located 30m from the River Dee and Bala Lake SAC.

We have concerns that harm from the proposed development on the SAC site cannot be ruled out.

We note that the proposed development is within its own fenced boundary approximately 30m from the SAC site and does not propose altering the field surrounding the fenced camping area.

We note that the submitted Preliminary Ecological Appraisal summary (section 6) proposes a lighting scheme and landscape buffer to the SAC site. The landscape buffer is referenced again within the Planning Statement by Roger Parry & Partners (September 2025) under section 5.26. It is understood that this landscape buffer is being proposed as a mitigation to prevent harm to the SAC site.

However, there doesn't appear to be any further information on the establishment of this landscape buffer. As the security of this mitigation is currently unclear, we advise your Authority to clarify this in your Habitats Risk Assessment (HRA).

To secure appropriate mitigation measures, we advise that the document listed below should be included in the approved plans and documents condition of the decision notice. Provided the measures set out in those documents are implemented as prescribed, we consider that the proposed development would not adversely affect the integrity of the SAC site.

- Preliminary Ecological Appraisal, Land at Erw Gerrig, Tregeiriog, Llangollen, LL20 7HS by Arbor Vitae 07 May 2025

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), your authority must, before deciding to give consent for a project which is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as the you specify. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC/SPA/Ramsar site.

Sites of Special Scientific Interest (SSSI)

The application site is located 40m from the Afon Dyfrdwy (River Dee) SSSI and 60m from the Pandy Quarries SSSI.

Afon Dyfrdwy (River Dee) SSSI

NRW consider the proposals have the potential to impact upon the Afon Dyfrdwy (River Dee) SSSI where otters are featured. Providing the impact pathways referenced above for the SAC are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded.

Pandy Quarries SSSI

We have considered the information submitted in support of the above application. Based on the information submitted, we consider that the proposed development is not likely to damage the features for which Pandy Quarries SSSI is of special interest.

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 package treatment plant is to be installed to provide foul drainage for the glamping pod development. We also note the proposed drainage field will be located in excess of 50m from any other known discharge to ground within the vicinity with a combined daily discharge rate of less than 2m3 (as highlighted in section 5.47 of the Planning Statement by Roger Parry & Partners (September 2025).

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 foul drainage method. 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'*.

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 information submitted in support of the above application 'Preliminary Ecological Appraisal, Land at Erw Gerrig, Tregeiriog, Llangollen, LL20 7HS by Arbor Vitae 07 May 2025' has identified that bats, otters and Great Crested Newt (GCN) unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats, otters and GCN.

We refer you to the Protected Sites section for further information regarding implementing mitigation. We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.

Other Matters

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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 about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Shaun 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.