Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-292664-G0N7
Eich cyf/Your ref: P/2025/0167

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 20 November 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Replacement of 18 no touring pitches with 18 no static caravans with all associated works

LLEOLIAD/LOCATION: Trotting Mare Caravan Park, Knolton, Overton, Wrexham, LL13 0LE

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

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 (22 October 2025), 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 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 proposing a connection to an upgraded treatment tank. 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'*

The additional information submitted (letter dated 07/11/2025) states that the existing system discharges “directly into Shropshire and therefore falls entirely outside the River Dee SAC Catchment in Wrexham”. We note that the Proposed Site Plan reference 12588D-02 dated 31/01/2025 shows the location of the existing package treatment plant, however we advise that additional information is submitted to demonstrate the discharge point of the existing (or proposed if different from existing) discharge point from the package treatment plant and also details of whether this is to ground or watercourse.

We note that reference is also made to the tourer caravans not being individually serviced but that there are communal bathroom facilities, and that the submitted calculations are based on British Water Flows and Loads with 100litres for the existing tourers and an additional 50litres of wastewater per person per day based on the listed amenities. The cover letter states that “This equates to 150L of wastewater flow per person from the current touring pitches, being directly comparable to the 150Lfor a s “static fully serviced” activity”.

We advise that further information is submitted to demonstrate the existing water usage at the site for the touring caravans over the busiest weekends during previous holiday seasons such as Easter Weekend, August Bank Holiday, May bank holidays etc.

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

No ecological information has been submitted in support of this application. We note that there are records of bats in the vicinity of the application site. We recommend you seek the advice of your Authority’s internal ecological adviser about the requirement for further information to be submitted in support of the application, the need for bespoke surveys and the scope of further information, where required.

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,

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.