Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-293348-Y6K7
Eich cyf/Your ref: P/2025/0854

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 15 December 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Change of use of land to create glamping site (seven units)

LLEOLIAD/LOCATION: Land South of Queensbridge Farm, Overton, Wrexham, LL13 0LE

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 17 November 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 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, a condition regarding protected species should be attached to any planning permission granted. Without the inclusion of this condition, we would object to this planning application.

Protected Sites and Foul Drainage

River Dee and Bala Lake Special Area of Conservation (SAC)

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 confirming that foul drainage will

connect to two treatment systems and then discharge into drainage mounds. Section 2.2 of the submitted BRE365 Report (HT Drainage Consultancy Ltd, 05/03/2025) states that trial pits were dug for percolation tests but filled with groundwater within 30 minutes, so the tests were abandoned and drainage mounds proposed. 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 addition to the information outlined in our Advice we advise that the following information is also submitted:

- Details regarding the specification, dimensions and locations of the drainage mounds
- Drainage and wash down details regarding the hot tubs

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 have reviewed the following information which has been submitted in support of the application:

- Preliminary Ecological Appraisal, 14th January 2025, Arbtech Consulting Ltd
- Ecological Impact Assessment Report, October 2025, Collington Winter Environmental

We note that the Ecological Impact Assessment Report has identified that the application site supports significant foraging and commuting for several species of bats, with section 3.8.41 confirming "seasonal trends indicating a nearby maternity and mating roost and reliance on offsite woodland edge and hedgerows for commuting and foraging" and also that "Overall, the modified grassland on site offers limited value, whereas offsite woodland, hedgerows, and riparian habitats provide key resources of high local importance".

The species of bats detected during the surveys:

- Common pipistrelle
- Soprano pipistrelle
- Lesser Horseshoe
- Noctule
- Brown Long-eared
- Natterer
- Daubenton's
- Whiskered
- Leisler's
- Serotine

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the

development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

We consider that the above report (Ecological Impact Assessment Report) provides an adequate basis upon which to consider the potential impacts of the scheme on this species and inform the decision-making process.

Notwithstanding this, we also advise that further information is required to manage the potential impacts of the scheme in respect of lighting. However, we would be content for this further information to be provided via a suitably worded condition.

We therefore advise the following condition in respect of bats is included on any permission granted:

Condition: Prior to installation a Lighting Plan has been submitted to and approved in writing by the Local Planning Authority. This Lighting Plan shall consider existing and proposed lighting together with any spillage originating from internal light sources including:

- Details of lighting to be used during and post construction;
- Plans illustrating the location and type of lighting;
- Plans illustrating projected or retained bat emergence points; together with retained or proposed features planned to be functionally used by bats for foraging/dispersal purposes;
- Provisions of the scheme shall accord with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/23: Bats and Artificial Lighting at Night.

The Lighting Plan shall be carried out in accordance with the approved details.
Justification: To ensure that bats are protected by the development.

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.