Response to Natural Resources Wales Consultation

Application Ref: P/2025/0854
Proposal: Change of use of land to create glamping site (seven units)
Site: Land South of Queensbridge Farm, Overton, Wrexham, LL13 0LE

ADDENDUM – RESPONSE TO NATURAL RESOURCES WALES CONSULTATION (15 DECEMBER 2025)

The following sections are appended to the original submission without alteration to its content. They are provided solely to address the matters raised by Natural Resources Wales in their consultation response and draw directly upon the technical confirmation provided by Premier Tech Water & Environment.

1. River Dee and Bala Lake SAC – Foul Drainage and Nutrient Considerations

NRW notes that the site lies within the River Dee and Bala Lake SAC catchment and that foul drainage arrangements must be assessed under the Habitats Regulations. The applicant confirms that foul drainage will be treated on site to a high standard prior to discharge to ground, with no direct discharge to any surface watercourse. Nutrient loading has been minimised through system design, conservative occupancy assumptions and high-performance treatment.

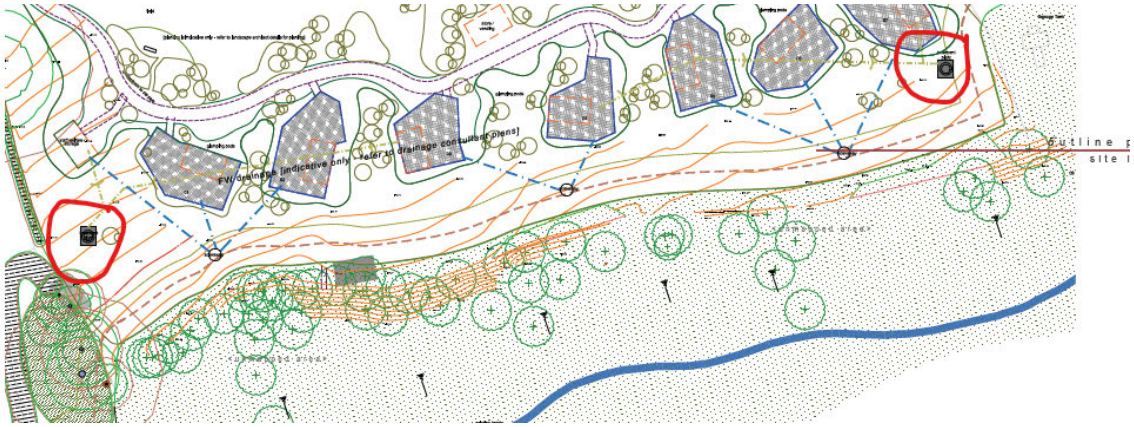
2. Foul Drainage Strategy – Detailed Confirmation

The foul drainage system is designed in accordance with British Water Code of Practice – Flows and Loads 4 and Building Regulations Part H. The total calculated daily hydraulic loading is approximately 3,245 litres/day (32 PE). As this exceeds the 2,000 litres/day threshold, the system is divided into two independent treatment schemes, each discharging below the regulatory limit.

Each scheme comprises a primary settlement tank followed by a Premier Tech ECOFLO packaged sewage treatment plant certified to EN 12566-3 and PIA standards, with treated effluent discharged to ground via engineered drainage mounds.

3. Drainage Mounds – Specification and Location

In response to NRW's request for clarification, the drainage mounds are confirmed as engineered ECOFLO drainage mound systems, designed specifically for sites with high groundwater levels. They are constructed in accordance with Building Regulations Part H and BS 6297, ensure even effluent distribution, and are located away from watercourses and woodland root protection areas as shown on the submitted plans.



4. Hot Tub Drainage and Wash-Down Controls

The hot tubs are Woodpecker Tubs – Prime models with a maximum volume of approximately 1,700 litres each. Each unit is fitted with a quartz sand filtration system which significantly reduces the need for full drain-downs.

Operational controls include: • No routine full drain-downs • Maximum partial discharge of approximately 20% (c.340 litres) during maintenance • Only one hot tub drained on any given day • Drain-downs staggered to avoid cumulative loading

These controls ensure flows remain within the available hydraulic capacity of the treatment systems.

5. Habitats Regulations Assessment

A Habitats Regulations Assessment prepared by Collington Winter Environmental Ltd confirms that there will be no adverse effect on the integrity of the River Dee and Bala Lake SAC, subject to the drainage mitigation now fully detailed and confirmed.

6. Protected Species and Lighting

NRW has confirmed that the submitted Ecological Impact Assessment provides an adequate basis for decision-making in respect of bats. The applicant accepts the recommended lighting condition and will submit a detailed Lighting Plan in accordance with ILP and Bat Conservation Trust Guidance Note 08/23 prior to installation.

This addendum is intended to clarify and confirm the information already submitted and does not alter the substance of the original proposal.

Yours sincerely,

[redacted]

Daniel Espley
National Installation Manager