SECOND ADDENDUM – 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
This Second Addendum is submitted by **Premier Tech Water & Environment** and should be read alongside the two previous responses already provided. It is issued solely to address the outstanding matters raised by Natural Resources Wales of their consultation response dated 29 January 2026, and to confirm compliance with NRW's published advice for development affecting phosphorus sensitive Special Areas of Conservation.

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1. Direction of Hot Tub Drain-Down Discharge (Section 4 Clarification)
Natural Resources Wales notes that Section 4 of the previous addendum did not explicitly confirm where hot tub drain-down water would be directed and raises concern due to the presence of a watercourse downslope of the glamping pods.
We confirm unequivocally that:

- **All hot tub drain-down and wash-down discharges will be permanently connected to the foul drainage system.**
- **No hot tub discharge will be allowed to drain to ground, flow overland, or migrate towards the on-site watercourse.**
- All hot tub discharges will be conveyed via sealed pipework to the **Premier Tech ECOFLO® treatment systems** and subsequently discharged **only to the engineered drainage mounds**.

The system has been expressly designed to avoid reliance on conventional soakaways, in direct response to the findings of the BRE365 Report (HT Drainage Consultancy Ltd, 05/03/2025), which confirmed that ground conditions are not suitable for soakaway infiltration. The proposed solution utilises raised, engineered drainage mounds designed for low-permeability soils and high groundwater conditions, thereby removing any pathway for untreated or partially treated effluent to reach the watercourse.

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2. Drainage Mounds – Specification, Dimensions and Design Basis
In response to NRW's request for further detail, the proposed drainage mounds are confirmed as **engineered ECOFLO® drainage mound systems**, designed and installed in accordance with:

- Building Regulations Part H
- BS 6297:2007
- British Water Code of Practice – Flows and Loads 4

Key technical details are set out within the submitted **Premier Tech Drainage Report** and supporting manufacturer documentation, including ECOFLO® system drawings and EN 12566-3 performance certification.
In summary:

- The development has a calculated total loading of **32 PE** with a total daily hydraulic load of approximately **3,245 litres/day**.
- In accordance with the General Binding Rules, the foul drainage system is split into **two independent treatment and disposal schemes**, each discharging **below 2,000 litres/day**.
- Each scheme comprises a primary settlement tank followed by a **PIA-certified ECOFLO® media filter**, with treated effluent distributed evenly across a dedicated engineered drainage mound.
- The ECOFLO® system has been independently tested and certified for treatment efficiency and suitability in wet ground conditions prior to discharge to ground.

Following careful consideration of **NRW's Advice section**, the foul drainage layout has been **revised** and the drainage mounds have been **relocated** so that they are now positioned **outside of the SAC area** and at increased separation distances from sensitive receptors.
The **precise locations** of the drainage mounds will be shown on an **updated site layout drawing prepared by the project architect**, which reflects this revised arrangement and follows directly from NRW's advice.

3. Drainage Mound Location and Relationship to SAC Woodland

As a direct response to NRW's advice, the drainage infrastructure has been repositioned to ensure enhanced separation from designated and sensitive features.

We confirm that:

- **All drainage mounds are now located outside of the SAC area.**
- **Treatment Plant 1** is located:
  - A minimum of **50 metres from the woodland edge** associated with the River Dee and Bala Lake SAC; and
  - Approximately **40 metres from the roadside ditch** running along the hedgerow.
- **Treatment Plant 2** is located:
  - A minimum of **50 metres from the woodland edge**; and
  - A minimum of **50 metres from the neighbouring septic tank**, in accordance with accepted separation guidelines.

These revised offsets ensure no interaction with SAC woodland habitats, surface water features, or third-party private drainage infrastructure. The updated site drawing will clearly illustrate these separation distances.

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4. Compliance with NRW Advice for Phosphorus Sensitive SAC Catchments

We confirm that the revised foul drainage strategy has been designed in full accordance with **Natural Resources Wales' "Advice to Planning Authorities for Planning Applications Affecting Phosphorus Sensitive Special Areas of Conservation"**, and that NRW's advice has been actively taken on board in finalising the drainage layout.

The key requirements of that advice have been met as follows:

- **Avoidance of surface water discharge:**
  No treated or untreated effluent is discharged to any watercourse. All foul flows are treated on site and discharged to ground via engineered drainage mounds located outside the SAC.
- **Minimisation of nutrient loading:**
  Nutrient inputs have been minimised through conservative occupancy assumptions, system splitting to remain below regulatory thresholds, and the use of high-performance, EN 12566-3 certified treatment technology with proven removal efficiencies.
- **Appropriate treatment standard:**
  The ECOFLO® media filter system provides independently verified treatment performance, achieving high levels of BOD, suspended solids and ammonia reduction prior to discharge.
- **Site-specific design informed by NRW advice:**
  The final drainage mound locations respond directly to NRW's advice by increasing separation distances from woodland, ditches, and third-party drainage systems.
- **Evidence-led assessment:**
  Compliance is demonstrated through the submitted Drainage Report, ECOFLO® performance certification, foul drainage calculations, and the Habitats Regulations Assessment.

Taken together, the submitted and revised information demonstrates that the proposal will not result in an adverse effect on water quality or the integrity of the River Dee and Bala Lake SAC.

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5. Conclusion

This Second Addendum confirms that:

- Hot tub drain-down is fully contained within the foul drainage system;
- No discharge is directed towards the on-site watercourse;
- Engineered drainage mounds are used in place of soakaways due to ground conditions;
- Drainage mounds have been relocated outside the SAC area in response to NRW advice;
- Enhanced separation distances are now provided from woodland, ditches and neighbouring drainage infrastructure;
- The foul drainage strategy complies fully with NRW guidance for phosphorus sensitive SAC catchments.

We trust this clarification fully addresses the matters raised NRW's consultation response.

Yours faithfully,
Premier Tech Water & Environment
Daniel Espley
National Installation Manager

Yours sincerely,

[redacted]

Daniel Espley
National Installation Manager