Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-302134-V3F5
Eich cyf/Your ref: P/2026/0004

Flintshire County Council
County Hall
Mold
CH7 6NB

Dyddiad/Date: 20 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Change of use of land and siting of 3 glamping pods

LLEOLIAD/LOCATION: Land to the East of Park Lane Court, Parkside, Rossett, Wrexham, LL12 0BQ

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 02 March 2026.

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.

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.

Approved Document: Preliminary Ecological Appraisal, reference C541/2.0, dated 16/12/2025, Marches Ecology

Without the inclusion of this document we would object to this planning application.

Protected Sites and 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, 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 package treatment plant is to be installed to provide foul drainage for the siting of 3 glamping pods.

We note from the previously submitted Neutrality Assessment and Mitigation Strategy (Land at Park Lane Court, Parkside Rossett, Reference: 2500117-ENV-01-OT-TR-E-0001, dated 19/11/2025) that section 4.12 refers to the drainage mound being “constructed using imported soils with a Vp value of 12”.

Appendix 4 of GPP4 guidance-for-pollution-prevention-4-2022-update.pdf states that drainage fields should only be used where there is a Vp value of between 15 and 100. We note that the proposal is to construct a drainage mound due to the percolation tests (KB Civils, Groundwork, Civil Engineering and Building Contractor, dated 22/10/2025) demonstrating water levels in the test pits had not dropped after 2hours.

We therefore have concerns that the resultant effluent discharge from the drainage mound could cause ponding at the ground surface, as it has not been demonstrated that the natural soil (in situ) can absorb any effluent. We advise that alternative or amended drainage proposals are developed or an alternative location is considered to address our concerns.

As such, we refer you to our Advice and advise you to seek further information from the applicant. Further details can also be found in the section titled ’What does this mean for development proposals involving private sewage treatment systems’ of that Advice.

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, reference C541/2.0, dated 16/12/2025, Marches Ecology).

The information has identified that great crested newts (GCN) are material to the application site. Section 4.2.18 confirms GCN records approximately 740m away and a potential waterbody approximately 290m away. Section 4.2.21 states that as the “presence of Great Crested Newts cannot be entirely ruled out at the survey site it will be necessary to implement non-licensed Reasonable Avoidance Measures (RAMs) both before and during the proposed site clearance/ construction works”. We concur with this approach and note that these measures will be further detailed in a Method Statement (footnote 15).

GCN and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981. Where GCN 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 requirements set out in the legislation. A licence may only be authorised if:

i. The development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;
ii. There is no satisfactory alternative; and,
iii. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

To avoid developments with planning permission subsequently not being granted a licence, the Local Planning Authority should take Planning Policy Wales and Technical Advice Note 5 into account when considering development proposals where a European Protected Species is present.

Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the 3rd test "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species". We advise that before any consent is given, as informed by the provisions of Regulation 9 of the Conservation of Habitats and Species Regulations 2017 (as amended) the LPA satisfy itself as to whether the scheme satisfies the other two tests, namely a relevant Habitats Regulations purpose and whether there is no satisfactory alternative to the proposal.

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

Therefore, we advise that the following document is included in the approved list of plans / documents condition within the decision notice: (Preliminary Ecological Appraisal, reference C541/2.0, dated 16/12/2025, Marches Ecology).

We also advise that the Method Statement referred to in the Preliminary Ecological Appraisal is secured by appropriate means by your Authority.

Flood Risk Activity Permit

Our mapping indicates that the Daisy Lane Drain main river runs along the western boundary of the application and may be culverted in this location. The proposal includes vehicular accesses being created to link to the adjacent driveway and as such may impact on the watercourse.

We would advise that the applicant undertakes further investigations (such as CCTV drain survey) to establish the location and route of the watercourse through the application site.

Please advise the Applicant that the Environmental Permitting Regulations (2016) require them to obtain a bespoke Flood Risk Activity Permit for any works or structures located in, under, over or within 8 metres of the Daisy Lane Drain, a designated "main river". Further advice and guidance is available on our website at: Natural Resources Wales / Check if you need a flood risk activity permit (FRAP)

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.