Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-294474-Z2Y9
Eich cyf/Your ref: P/2025/0874

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 19 December 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CHANGE OF USE OF LAND TO CREATE GYPSY/TRAVELLER SITE COMPRISING 2 NO MOBILE HOMES, 2 NO TOURING AND 1 NO DAYROOM WITH ASSOCIATED WORKS

LLEOLIAD/LOCATION: LAND AT SERVICE AREA SITE, GRASS LANE, BURTON, ROSSETT, WREXHAM, LL12 0AU

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 01 December 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.

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 (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 that the proposed method of foul drainage is stated on the application form as a new cesspit. 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.

The installation of a cesspit is not considered environmentally acceptable because of the greater risk of failures leading to pollution of the water environment compared to a package treatment plant or public sewerage system which is the preferred option.

Further information and guidance around cesspits can be found below;

Cesspit

Within the "Approach to Groundwater Protection" guidance (issued by the Environment Agency in 2018 and adopted by Natural Resources Wales), Position Statement G6 states "Natural Resources Wales does not encourage the use of cesspools or cesspits, other than in exceptional circumstances. A cesspool or cesspit is a sealed unit that is used for the storage of untreated sewage. There must be no discharge to the environment. Poorly managed cesspools and cesspits present a considerable risk of causing pollution, which can be difficult to monitor and correct". Given the highly sensitive nature of the site we have concerns regarding the use of a cesspool / cesspit.

In addition, new developments proposing to use private drainage should follow the hierarchy within the Welsh Government Circular 008/2018 (July 2018). The Circular stresses the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where having taken into account the cost and/or practicability it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered. The use of cesspools/cesspits is discouraged. We refer you to paragraphs 2.3-2.8 in the Circular, which set out the approach to be followed.

The applicant should therefore demonstrate how they have followed the hierarchy within the Welsh Government Circular 008/2018 (July 2018). Otherwise, we would object to the application.

If the applicant can demonstrate a private sewage treatment system is not feasible, they will also need to demonstrate that the proposal would not pose an unacceptable risk to the water environment. Welsh Government Circular 008/2018 advises that a full and detailed consideration be given to the environmental criteria listed under paragraph 2.6 of the Circular, in order to justify the use of private sewerage.

As stated above, we expect developers discharging domestic sewage to connect to the public foul sewer where it is reasonable to do so. We will not normally grant a discharge permit for a private sewage treatment system where it is reasonable to connect to the public foul sewer. We also expect discharges of trade effluent to connect to the public foul sewer where it is reasonable to do so and subject to the sewerage undertaker granting a trade effluent consent or entering into a trade effluent agreement.

Furthermore, we refer you to the section in our Advice titled '*What does this mean for development proposals involving private sewage treatment systems'.*

In exceptional circumstances, where a cesspool/cesspit can be justified, the Circular advises that a full and detailed consideration be given the to the environmental criteria listed under paragraph 2.6.

It is essential that any cesspit is installed correctly. Incorrectly maintained cesspools can cause pollution by contamination of the ground, groundwater and, sometimes surface water. Any damage to the fabric of the cesspool, such as cracks or holes, is difficult to detect but needs to be rectified immediately in order to prevent pollution. The cesspit should meet the requirement of British Standard BS 6297. It should be fitted with a level warning device to indicate when the tank needs emptying.

Guidance

We recommend the applicant reviews the following guidance in relation to the proposed development:

- Guidance for Pollution Prevention 4 (NetRegs website): Sewage treatment and disposal where there is no foul sewer (GPP4)
- EPR (Environmental Permitting Regulations) Guidance
- NRW guidance (May 2019): How to run your household sewage treatment system well (this document contains some really useful explanatory text regarding different treatment options and EPR).

Protection of Groundwater

It is noted that the site is located within Source Protection Zone (SPZ) 3 and overlies a Principal Bedrock Aquifer, it is therefore considered sensitive with respect to controlled waters. SPZs are designated by Natural Resources Wales to identify those areas close to drinking water sources where the risk associated with groundwater contamination is greatest.

An appropriate risk assessment should be submitted by the applicant to demonstrate that the risks to potable water supplies posed by this development can be safely managed. This is to ensure the protection of a groundwater resource.

It should be noted that the results of the risk assessment may affect the planning application, such as:

- The design and/or layout of the buildings may need to change to accommodate the drainage field
- The design of the foul drainage system may need to include abatement technology to reduce the impact of the development beyond normal standards.

All permit applications will be considered on the basis of risk assessment and the appropriateness of the discharge with respect to the local environmental setting. Further information on permits and discharges is available on our website.

Protected Species

No ecological information has been submitted in support of this application. We note that there are records of otters in the vicinity. 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 on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

John Littlemore
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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.