Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-297518-X5D3
Eich cyf/Your ref: P/2024/1049

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 26 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CHANGE OF USE OF AGRICULTRUAL LAND TO GYPSY/TRAVELLER SITE FOR SINGLE FAMILY PITCH INCLUDING BIO-DISC SEWAGE TREATMENT PLANT AND IMPROVED VEHICULAR ACCESS, HARD STANDING AND TURNING AREA

LLEOLIAD/LOCATION: Land at, Llyndir Lane, Rossett, Wrexham, LL12 0DH

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information regarding the above.

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.

Protected Sites – 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 (28 June 2024), 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 new sewage treatment plant and drainage mound is to be installed to provide foul drainage for the development. As such, we refer you to our Advice and advise you to seek further information as identified in the section "*What does this mean for development proposals involving private sewage treatment systems*?" and the final bullet point in the section titled "*What development proposals are unlikely to increase nutrient levels within a river SAC*?", which states:

- *"private sewage treatment systems discharging domestic wastewater to ground, built to the relevant British Standard (BS 6297:2007+A1:2008) having a maximum*

daily discharge rate of less than 2 cubic metres (m3) and where the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain and located more than 50m from a SAC boundary and at least 50m from any other known discharge to ground"

We note the foul drainage calculations submitted appear to relate only to the day room/amenity building. However, the site layout includes three touring caravans, a welfare unit and a static caravan. No calculations have been provided for these units. The estimated population equivalent would appear to exceed the threshold for exemption under the 2m³/day rule and therefore we advise clarification should be provided. Therefore, the discharge rate does not comply with the screening criteria as noted in the second bullet point above.

We also note that the plan showing the proposed drainage mound has been updated as per our previous comments and in line with the bullet point above.

We advise that a valid environmental permit will be required for the proposed foul drainage system. Further details can be found here, and further information may be needed as part of that application process. The Applicant is therefore advised to contact us for pre-application advice at the earliest opportunity to try to ensure that there is no conflict between any planning permission granted and the permit requirements. Further details on how to access our pre-application advice service can be found here.

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.

Flood Risk

We note that the planning application was validated on 20/6/2024. In accordance with Welsh Government's Written Statement dated 31 March 2025, our advice is based on Technical Advice Note 15 (TAN15), July 2004.

The planning application proposes highly vulnerable development (Gypsy/Traveller site). The application site is within Zone B of the Development Advice Map (DAM) contained in TAN15 (2004). However, our Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and within Flood Zone 2 (Rivers).

As confirmed in the letter from Welsh Government dated 15 December 2021, the FMfP represents better and more up-to-date information on areas at flood risk than the DAM.

The Flood Consequences Assessment (FCA) undertaken by FloodSmart Plus, dated 23/05/2025, reference 85344R1, shows that the risks and consequences of flooding are manageable to an acceptable level. Therefore, we have no objection on flood risk grounds to the application as submitted.

Subject to no further fluvial or operational risk being raised by the Lead Local Flood Authority, we advise that any low probability, low risk fluvial flood risk could be managed

by ensuring that all vulnerable development/thresholds are set at least 200mm above adjacent ground level or for retrospective development, appropriate flood proofing and resilience measures adopted.

A suitable buffer zone should be maintained alongside all open watercourses that border the site.

The above advice is based on a proportionate approach given the scale of the proposed development. Any intensification of development on the site may require further flood risk assessment and submission of a detailed FCA.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on or grant the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

Protected Species

We note that the ecological report submitted in support of the above application (Ecological Impact Assessment at Llyndir Lane, Rossett, Wrexham, by Susan Worsfold, dated 14/02/2025) has identified that protected species are not present at the application site. We therefore have no comments to make on the application as submitted, and advise that you liaise with your own Authority's ecologist.

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,

Rhys Jones
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.