THIRD 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 Third Addendum is submitted by **Premier Tech Water & Environment** and should be read alongside all previous drainage submissions and addendums already provided.
It is issued solely to address comments raised by **Natural Resources Wales consultation response dated 14 May 2026**, specifically regarding management of wastewater arising from hot tubs.
Natural Resources Wales advised that:

- Hot tubs should not discharge to package treatment plants due to potential hydraulic overload concerns; and
- Discharge to ground or traditional soakaways is not considered feasible due to site infiltration characteristics.

This addendum therefore provides an alternative hot tub wastewater management arrangement.

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1. Existing Approved Drainage Strategy – Confirmation
This addendum relates **only** to hot tub wastewater management.
For avoidance of doubt:
The previously submitted foul drainage strategy remains unchanged and unaffected by this amendment.
This includes:

- Approved foul drainage arrangements;
- Approved treatment systems;
- Approved drainage mound locations;
- Previously submitted hydraulic calculations;
- Previously submitted mitigation measures relating to SAC protection;
- Previously submitted NRW responses and drainage addendums.

No revisions are proposed to the approved foul drainage strategy through this document.
Accordingly:
This Third Addendum supersedes previous references relating specifically to hot tub drainage arrangements contained within earlier submissions.
All other previously submitted drainage information remains unchanged.

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2. Revised Hot Tub Wastewater Management Strategy
Following NRW comments, hot tub wastewater shall be managed through a **fully independent sealed containment system**, entirely separate from all approved foul drainage infrastructure.
We confirm unequivocally that:
Hot tub wastewater shall not discharge:
To ground
To soakaways
To drainage mounds
To watercourses
To SAC-sensitive environments
Via any previously approved foul drainage arrangements

Instead:
Hot tub wastewater shall be conveyed via **dedicated sealed pipework**;
Pipework shall discharge to a **sealed independent storage vessel**;
Wastewater shall remain fully contained pending licensed off-site removal.
This arrangement creates complete separation between hot tub wastewater and all previously submitted drainage proposals.

3. Independent Storage System

The proposed arrangement shall comprise:

Dedicated Sealed Collection Network

A sealed independent drainage system serving hot tubs only.

Sealed Storage Tank

Wastewater shall discharge to an independent sealed holding tank.

Indicative storage capacity:

Capacity to be confirmed at detailed design stage, sized with substantial contingency beyond projected operational requirements.

The storage provision will intentionally exceed anticipated operational demand to ensure:

No overflow risk

No emergency discharge requirement

No hydraulic loading concerns

Significant operational contingency

Long-term resilience under peak occupancy scenarios

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4. Indicative Location

The sealed containment system shall be positioned in a location consistent with wider environmental mitigation measures and increased separation distances from environmentally sensitive receptors.

Indicatively:

- Located approximately **50 metres outside SAC-sensitive interfaces**;
- Positioned away from approved drainage infrastructure;
- Located away from woodland habitats and surface water pathways.

Final location to be confirmed via detailed design and reflected within updated site drawings where required.

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5. Operational Management and Waste Removal

We confirm unequivocally that all hot tub wastewater shall be:

- Fully contained within the sealed storage system;
- Removed from site by a **licensed trade effluent contractor**; and
- Transported for disposal via approved off-site treatment routes.

A management regime shall be adopted by the operator including:

- Periodic collection schedules;
- Ongoing maintenance of containment infrastructure;
- Retention of waste transfer documentation where required.

This provides a fully controlled and auditable long-term management arrangement.

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6. Indicative Operational Volumes

The proposed hot tubs operate using sand filtration systems intended to minimise complete drain-down events.
Indicative operational assumptions include:

- Large hot tubs (2 units): approximately 1,700 litres each
- Smaller hot tubs (5 units): approximately 1,100 litres each
- Routine maintenance involving approximately 20% partial drain-downs
- Maintenance intervals approximately every 3 weeks
- Drain-downs staggered to avoid cumulative loading

Based on these assumptions:

Item	Approximate Annual Volume
Larger hot tubs	~11,560 litres/year
Smaller hot tubs	~18,700 litres/year
Total estimated annual wastewater generation	**~30,260 litres/year**

Assuming removal by tanker of approximately 16,000 litre capacity:
Indicative collection frequency may be in the order of approximately two removals annually.
This demonstrates that:

- Wastewater volumes remain low;
- Removal requirements are infrequent;
- Associated vehicle movements are negligible;
- Significant contingency remains available within storage provision.

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7. Protection of River Dee and Bala Lake SAC

The revised approach represents a highly precautionary solution.
The amended arrangement provides:
Elimination of hydraulic loading concerns relating to hot tub wastewater
No discharge pathway to the River Dee and Bala Lake SAC catchment
Elimination of groundwater infiltration risks
Additional environmental safeguards beyond standard wastewater management arrangements
Long-term auditable control of all hot tub wastewater
The proposed arrangement therefore further reduces potential interaction between hot tub wastewater and environmentally sensitive receptors.

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8. NRW Registrations and Existing Permissions

The Applicant confirms that registrations relating to the existing approved foul drainage arrangements have been progressed with Natural Resources Wales as advised.
This addendum does not alter those arrangements and should be read solely as an amendment relating to hot tub wastewater management.

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9. Conclusion

This Third Addendum confirms:

- All previously submitted foul drainage proposals remain unchanged;
- Previous NRW drainage responses remain unaffected;
- This amendment relates solely to hot tub wastewater management;
- Hot tub wastewater will be managed independently of previously submitted drainage proposals;
- No hot tub wastewater shall discharge to ground, watercourses or SAC-sensitive environments;
- Wastewater shall be contained, removed off-site and managed by licensed contractors;
- The revised arrangement addresses concerns raised by NRW regarding hydraulic loading and hot tub drainage.

We trust this clarification fully addresses the matters raised within NRW's consultation response and provides additional assurance regarding long-term environmental protection and operation of the site.

Yours faithfully,

Premier Tech Water & Environment

Daniel Espley

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