Our Ref: CAS-310745-X4Y5

Your Ref: P/2025/0854

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 19 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Change of use of land to create glamping site (seven units)

Lleoliad/Location: Land South Of Queensbridge Farm, Overton, Wrexham, LL13 0LE

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the additional information for the above, which we received on 09 June 2026.

We continue to have **concerns** with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following **condition** to any planning permission granted:

- **Condition 1: Protected Species**

We also advise that based on the information submitted to date, the **documents** identified below should be included in the approved plans and documents condition on the decision notice.

- Second Addendum, Premier Tech, uploaded on 02/02/2026
- Third Addendum, Premier Tech, uploaded on 09/06/2026
- Proposed Site Layout Plan, drawing reference 360MWT01-03 revision J

Please note, without the inclusion of this condition and documents we would object to this planning application. Further details are provided below.

We also advise that further consideration is required regarding **foul drainage**. Further details are provided below.

Protected Sites and Foul Drainage

River Dee and Bala Lake Special Area of Conservation (SAC)

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 Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive 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.

Section 2 of the Second Addendum (Premier Tech, uploaded on 02/02/2026) states that the drainage mounds will be designed and installed in accordance with Building Regulations Part H, BS 6297:2007 and British Water Code of Practice – Flows and Loads 4.

We note that the two drainage mounds have now been registered as exemptions under references NRW-WQE121100 and NRW-WQE121101.

Section 2 of the Third Addendum (Premier Tech, uploaded on 09/06/2026) states that “hot tub wastewater shall be managed through a fully independent sealed containment system, entirely separate from all approved foul drainage infrastructure”

We note the updated Proposed Site Layout Plan (drawing reference 360MWT01-03 revision J) shows the locations of the treatment plant drainage mounds in addition to the hot tub drainage location. Currently this drawing has ‘treatment plant mound’ noted in relation to the hot tub drainage proposals.

We recommend that your authority seeks an updated drawing that refers to the sealed containment system in line with the details as set out in the Third Addendum.

We advise that the Second Addendum, Third Addendum and Site Layout Plan once updated (drawing reference 360MWT01-03) are included within the approved documents condition should permission be granted.

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.

Permitting advice

Applicants wishing to operate a private sewerage system will need either to apply to us for an environmental permit or register with us for an exemption from the permit requirement. Septic tanks and small sewage treatment works that meet certain criteria may be registered as exempt.

A step by step guide to registering an exemption can be found on our website: Natural Resources Wales / Register your septic tank or small sewage (package) treatment plant

If the septic tank or private sewage treatment system is not eligible for an exemption, the Applicant will need to apply for an environmental permit, further details can be found here: Natural Resources Wales / Apply for a permit to discharge domestic sewage. Should a permit be required 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: Natural Resources Wales / Pre application advice for environmental permits.

It is important to note that a grant of planning permission does not guarantee that a permit will be granted. A proposal may be deemed unacceptable either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible. Applicants are encouraged to ensure they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site.

Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations. We also refer the Applicant to Guidance for Pollution Prevention 4 guidance-for-pollution-prevention-4-2022-update.pdf from the NetRegs Guidance for Pollution Prevention (GPP) documents | NetRegs | Environmental guidance for your business which provides further information.

Protected Species

We have reviewed the following information which has been submitted in support of the application:

- Preliminary Ecological Appraisal, 14th January 2025, Arbtech Consulting Ltd
- Ecological Impact Assessment Report, October 2025, Collington Winter Environmental

We note that the Ecological Impact Assessment Report has identified that the application site supports significant foraging and commuting for several species of bats, with section

3.8.41 confirming “seasonal trends indicating a nearby maternity and mating roost and reliance on offsite woodland edge and hedgerows for commuting and foraging” and also that “Overall, the modified grassland on site offers limited value, whereas offsite woodland, hedgerows, and riparian habitats provide key resources of high local importance”.

The species of bats detected during the surveys:

- Common pipistrelle
- Soprano pipistrelle
- Lesser Horseshoe
- Noctule

- Brown Long-eared
- Natterer
- Daubenton's
- Whiskered
- Leisler's
- Serotine

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats 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 tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

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

Notwithstanding this, we also advise that further information is required to manage the potential impacts of the scheme in respect of lighting. However, we would be content for this further information to be provided via a suitably worded condition.

We therefore advise the following condition in respect of bats is included on any permission granted:

Condition 1: Lighting Plan

Prior to installation a Lighting Plan has been submitted to and approved in writing by the Local Planning Authority. This Lighting Plan shall consider existing and proposed lighting together with any spillage originating from internal light sources including:

- Details of lighting to be used during and post construction;
- Plans illustrating the location and type of lighting;
- Plans illustrating projected or retained bat emergence points; together with retained or proposed features planned to be functionally used by bats for foraging/dispersal purposes;
- Provisions of the scheme shall accord with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/23: Bats and Artificial Lighting at Night.

The Lighting Plan shall be carried out in accordance with the approved details.

Justification:

To ensure that bats are protected by the development.

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

E-bost/E-mail: neplanning@cyfoethnaturiolcymru.gov.uk

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.