Ein cyf/Our ref: CAS-315243-P6F2
Eich cyf/Your ref: P/2026/0456

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 11 August 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Change of use of land to a 3 pitch family gypsy & traveller site and erection of stables

Lleoliad/Location: Land to the north of, Brymbo road, Bwlchgwyn, Wrexham, LL11 5TY

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 30 July 2026.

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 **protected sites**. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Sites

River Dee Nutrient Sensitive Special Area of Conservation Catchment

We note the application site is within the catchment of the River Dee 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 foul drainage is to be provided by the installation of a package treatment plant discharging to a gravel and sand base/grassed over filtration bed. 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. We advise you to seek further information as identified in the section titled 'What does this mean for development proposals involving private sewage treatment systems' of that Advice and offer the following comments.

Ground suitability

Whilst the proposed package sewage treatment plant does claim to incorporate nutrient reduction technology, the effectiveness of any package treatment plant is dependent not only upon the treatment process itself, but also upon the ability of the receiving ground to accept, attenuate and further treat the discharge.

The submitted information does not demonstrate:

- that ground conditions are suitable for infiltration, please provide results from ground infiltration/percolation testing.
- that the drainage field has been designed in accordance with BS 6297.
- that the drainage field has sufficient capacity to accommodate the proposed discharge volume, please provide drainage-field size calculations.
- that treated effluent will remain within the soil profile and receive adequate further treatment before reaching groundwater or surface waters

Of particular concern is the drain/ditch adjacent to the proposed location. This is hydrologically linked to the River Gwenfro and therefore any proposal should demonstrate measures will be put in place to prevent any effluent from entering the drain/ditch.

Number of occupants

The size of the site is also a little unclear. Whilst the proposal describes the site as being a "3-pitch family Gypsy & Traveller site" all of the submitted plans appear to show 6 caravan pitches on the site. The significant discrepancy in number of occupants could have a major impact on any treatment process's ability to suitably treat any wastewater.

The linked PEDW appeal refers to a maximum daily discharge rate being met of $2m^3$ per day – Industry guidance contained within the British Water Flows and Loads Code of Practice identifies a typical wastewater generation rate of approximately 150 litres per person per day for residential occupation of this nature.

Stables

There is no mention in the proposal of drainage arrangements for the stables. Package treatment plants designed for domestic wastewater are generally intended to receive domestic sewage. The application does not demonstrate:

- how stable drainage will be managed.
- whether wash-down waters will be generated.
- whether animal wastes or contaminated runoff could enter the treatment system.
- whether the treatment system has been designed to receive any non-domestic effluent.
- how pollution of adjacent ditches and watercourses will be prevented

Summary

Further information is required in order to demonstrate nutrient neutrality and no impacts to water quality of the adjoining waterbody

- infiltration/percolation test results undertaken in accordance with BS 6297.
- drainage-field design calculations and sizing methodology.
- confirmation of the design population equivalent and anticipated wastewater flows.
- clarification of the number of pitches proposed and maximum site occupancy.
- details of drainage arrangements associated with the stables.
- further information demonstrating that the proposed foul drainage arrangements will not adversely affect the River Gwenfro or the River Dee SAC.
- A nutrient budget calculation from the site.
- Details of any monitoring and maintenance plans for the site's wastewater systems

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 note that the information submitted in support of the above application (Ecological Appraisal ref: PEA BJ24-011.2 dated 23 April 2025 by Ben Jones Ecology) has identified that bats are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures and avoidance measures with your internal ecological advisor.

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,

Bryn Pryce BSc MSC MRTPI
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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.