Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-284599-N7Q2
Eich cyf/Your ref: CAS-03390-W2G2H2

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Dyddiad/Date: 01 August 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Without planning permission the material change of use of the land from an agricultural/equine use to a mixed use of agricultural/equine and a gypsy and traveller site

LLEOLIAD/LOCATION: Land South of Tyn y Coed, Moss Road, Moss, Wrexham, LL11 6HA

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 15 July 2025 and additional information on 30 July 2025.

We have no objection to the proposed development as a private treatment plant is confirmed as the foul drainage method and there is no longer a pathway to the River Dee & Bala Lake.

We have previously been consulted by the Local Planning Authority (LPA) regarding this proposal, under their reference P/2023/0711.

Additional information following the initial consultation on 15/07/25 was also received from PEDW via email on the 30/07/25, as follows:

- Response to PEDW Email dated 15th July 2025, Trevor Mennell Planning, dated 29th July
- Sewer Connection Plan
- Email Mr Adam Johnson – Clenviro
- Offical Certification of Search
- Council Additional Statement 28 July 2025

Our updated advice in relation to the additional information is as follows.

Protected Sites and Foul Drainage

In our response to the LPA (dated 10/11/23, our ref. CAS-241157-Y5D6) we advised that they seek further information in relation to the foul drainage proposals. This was due to a private sewage treatment system being proposed within connecting distance to an area served by public mains sewers within the River Dee and Bala Lake SAC catchment and insufficient information was provided to justify the proposal.

The appellant has subsequently submitted a document "*Response to PEDW email dated 15th July 2025*" in order to address questions from PEDW. In response to questions 23 - 29, the appellant has confirmed that a connection to the Dŵr Cymru / Welsh Water mains sewer is not feasible due to the practicalities of third-party ownership, the need for a pumping station and associated costs to address these issues.

In our view, we consider that sufficient justification has now been provided to demonstrate that it is not feasible to connect to the Dŵr Cymru / Welsh Water mains sewer and we acknowledge that a private treatment plant is to be implemented.

As a private treatment plant is now justified and confirmed as foul drainage method, there is no longer a pathway to the River Dee & Bala Lake via additional foul drainage loading to the Gresford wastewater treatment works that discharges to the River Alyn and ultimately the River Dee & Bala Lake SAC.

Therefore, we are satisfied that there is unlikely to be a source of additional nutrients and/or a pathway for impacts. As such, in our opinion (and to answer your question under point 40 of your consultation email dated 15th of July 2025), it would be reasonable for your Authority to screen out this proposal as not likely to have a significant effect on the River Dee and Bala Lake SAC in relation to nutrient inputs.

However, should the proposals change and a connection to mains be proposed, further information (Points 37 to 39 of your consultation email dated 15th of July 2025) to support you in carrying out a test of Likely Significant Effects and/or an appropriate assessment can be found here:

- River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid SAC (Natura 2000 site code UK0030252) – for further information please see: CONSERVATION OBJECTIVES FOR N2K SITES

- *Environmental Permit advice*

Should the proposed private drainage solution be progressed, the Applicant will need to apply for an Environmental Permit from NRW. It is important to note that a grant of planning permission does not guarantee that a permit will be granted, should a proposal be deemed to be unacceptable (either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible).

The Applicant is therefore advised to hold pre-application discussions with our Permitting Team on 0300 065 3000, at the earliest opportunity, to try to ensure that there is no conflict between any planning permission granted and the permit requirements.

Protected Species

We note that the ecology report submitted in support of the above application (Initial Habitat and Species Assessment for new site off Moss Road, Gwersylt by Camlad Ecology Ltd, dated October 2023) has identified that protected species are unlikely to be using the application site. We therefore have no comments to make on the application as submitted.

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,

Rachael Burke
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.