Ein cyf/Our ref: CAS-317398-W7Q6
Eich cyf/Your ref: P20260537

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 22 September 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Change of use of land to a 4 pitch family gypsy and traveller site

Lleoliad/Location: Land north of Croesfoel Court, Wrexham Road, Rhostyllen, Wrexham, LL14 4DR

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 25 August 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 **foul drainage**. If this information is not provided, we would object to this planning application. Further details are provided below.

We also advise that based on the information submitted to date, the **document** identified below (Preliminary Ecological Appraisal prepared by Tyrer Ecological Consultants Ltd, November 2025) should be included in the approved plans and documents condition on the decision notice. Without the inclusion of this document we would object to this planning application.

Protected Sites – Foul Drainage

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 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 that foul water disposal is proposed via the installation of a package treatment plant with discharge to ground, rather than connecting to the mains sewer. Applicants

should first explore the potential to connect to the public sewer network where this is reasonably feasible. As a general guide, connection to the mains sewer should be considered where the development is within approximately 30 metres of the network, with this distance typically applied cumulatively where multiple dwellings are proposed. In this case, the proposal comprises four dwellings and therefore further justification should be provided to demonstrate why connection to the public sewer is not practicable and why a private treatment solution is the most appropriate means of foul drainage.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your authority to determine. However, the installation of private sewage treatment facilities within publicly sewered areas is not normally considered environmentally acceptable because of the greater risk of failures leading to pollution of the water environment compared to public sewerage systems.

Section 6.6.21 of Planning Policy Wales states:

> "Any development discharging domestic sewage should connect to the foul sewer where it is reasonable to do so. Development proposing the use of non-mains drainage schemes will only be considered acceptable where connection to the main sewer is not feasible..."

Government guidance on private sewerage in Welsh Government Circular 008/2018 stresses that the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where having taken into account the cost and/or practicability it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

We therefore advise the applicant to either amend their proposals to ensure that the foul drainage is connected to the mains sewerage system or provide detailed evidence to demonstrate that it is not reasonable to connect.

The Applicant should thoroughly investigate the possibility of connecting to the foul sewer by taking the following steps:

- Approach the sewerage undertaker to reach an agreement for a connection to the foul sewer
- If the sewerage undertaker refuses connection to the public sewer, request that they adopt the proposed treatment system
- If the sewerage undertaker refuses both of the above, you must appeal the refusal with Ofwat

For further details please see Natural Resources Wales / Private sewage treatment in an area with a public sewer

The applicant should be aware that should a connection to the mains sewer not be feasible, they will also need to demonstrate that the proposal would not pose an unacceptable risk to the water environment. Welsh Government Circular 008/2018 advises that a full and detailed consideration be given to the environmental criteria listed under paragraph 2.6 of the Circular, in order to justify the use of private sewerage.

As stated above, we expect developers discharging domestic sewage to connect to the public foul sewer where it is reasonable to do so. We will not normally grant a discharge permit for a private sewage treatment system where it is reasonable to connect to the public foul sewer. We also expect discharges of trade effluent to connect to the public foul sewer where it is reasonable to do so and subject to the sewerage undertaker granting a trade effluent consent or entering into a trade effluent agreement.

Furthermore, we refer you to the section in our Advice titled What does this mean for development proposals involving connection to public wastewater treatment works.

Protected Species

We have reviewed the submitted Preliminary Ecological Appraisal prepared by Tyrer Ecological Consultants Ltd (November 2025). The report identifies that, at the time of survey, the application site had been cleared and no trees remained within the red line boundary. Historic aerial imagery reviewed as part of the assessment indicates that prior to clearance the site likely comprised a mosaic of habitats, including grassland, mature trees and hedgerow features, which may have provided habitat of moderate value for bat commuting and foraging.

We note that no evidence of bat roosting was identified within the application site and the report concludes that further bat surveys are not required. The assessment identifies that the principal ecological impact in respect of bats arises from the retrospective clearance of habitat that may previously have provided foraging and commuting opportunities.

We consider that the submitted report provides an adequate basis upon which to assess the potential impacts of the development on bats and inform the decision-making process. We concur with the report's conclusions and recommendations that appropriate biodiversity enhancement and habitat compensation measures should be secured to address the loss of habitat and to enhance the site's suitability for bats. These measures should include the bat enhancement recommendations set out within the ecological appraisal and form part of the proposed Biodiversity Enhancement Plan and Habitat Management and Monitoring Plan.

Subject to the implementation and long-term management of the recommended enhancement and compensation measures, we have no objection in respect of bats.

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,

Alisha Tyrrell-Liptrot

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.