Ein cyf/Our ref: CAS-268335-P1D2
Eich cyf/Your ref: P/2024/1496

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 28 November 2024

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: NEWID DEFNYDD 7 ADEILADAU (AMAETHYDDOL) I DDOSBARTH B2 (DIWYDIANT CYFFREDINOL) / CHANGE OF USE OF 7 BUILDINGS (AGRICULTURAL) TO CLASS B2 (GENERAL INDUSTRY)

LLEOLIAD/LOCATION: GATES FARM, HOLLY BUSH, BANGOR ON DEE, WREXHAM, LL13 0BH

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 13 November 2024.

We continue to 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.

Protected Sites and Foul Drainage

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 *Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation* (28 June 2024), 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 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 note that information has already been submitted in respect of confirming a new toilet block and installation of a new septic tank. However, we note from the drawing submitted on 13/11/2024, that a grass drainage field is proposed "subject to percolation tests". Furthermore, our mapping shows that the proposed drainage field is located within approximately 10m of a watercourse / ditch. Therefore, we advise you to seek further information as identified in the section titled *'Can*

additional wastewater be discharged to existing private sewage treatment systems?' of our Advice.

The further information should include:

- The location of the drainage field should be a minimum distance of 40m from any watercourses / ditches
- Percolation results to demonstrate whether a discharge to ground is feasible at this location
- Details to demonstrate that the system (including drainage field) would be built to the relevant British Standard (BS 6297:2007+A1:2008)
- Confirmation of the daily discharge rate from the proposed new foul drainage system
- Confirmation that the proposed drainage field is a minimum of 50m from other known discharges to ground within 50m

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 there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our website. We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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.