Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-268882-W0W8
Eich cyf/Your ref: P/2024/1583

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 10 December 2024

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CONVERSION OF OUTBUILDING TO HOLIDAY LET

LLEOLIAD/LOCATION: TY NEWYDD, SCHOOL LANE, OVERTON, WREXHAM, LL13 0ES

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 20 November 2024.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching a condition to any planning permission granted regarding foul drainage, as explained below.

Protected Sites – Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package 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.

This application for the conversion of outbuilding to holiday let proposes connection of foul water to the mains sewer. We note information has been provided by DCWW to confirm that permit for the associated wastewater treatment works has been reviewed against the revised water quality targets for the SAC. DCWW have also confirmed that will be able to accept the foul flows from the proposed development upon completion of the improvement works at Overton Wastewater Treatment Works (WwTW) and remain in compliance with revised permit limits. We refer you to our Advice and the information set out in the section titled '*What does this mean for development proposals involving connection to public wastewater treatment works'*.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. However, we are satisfied that our concerns can be overcome by attaching the following condition to any planning permission granted:

Condition: No part of the development hereby approved shall be connected to any means of foul disposal nor occupied for human habitation until details have been submitted to and approved in writing by the Local Planning Authority which confirms that that the planned reinforcement works at Overton WwTW have been completed and that they are able to accommodate the foul flows from the development

Reason: To prevent overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of, or detriment to, the environment.

Your Authority will need to take the above into account in your determination of whether the development is likely to have an adverse effect on the SAC.

Protected Species

We note that the bat report submitted in support of the above application (Susan Worsfold, July 2024. Bat Acti vity Survey. Ref TYN130522) has identified that bats are present at the application site (foraging and commuting). From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document '*Natural Resources Wales Approach to Bats and Planning* (2015)'. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

As this is a lower risk case for bats, we consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Furthermore, we advise that the proposed development is not likely to harm or disturb the bats or their breeding sites and resting places at this site, provided the avoidance measures described in the bat report are implemented.

We would welcome including the report in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Please consult us again if any further information shows that this is no longer a lower risk case.

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.

nIf you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Garmon Lewis
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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.