Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our Ref: CAS-274652-Q6G8
Eich cyf/Your Ref: P/2025/0108

Wrexham County Borough Council,
The Guildhall,
Wrexham,
LL11 1AY

Dyddiad/Date: 26 February 2025

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD/PROPOSAL: CONVERSION OF CHAPEL TO DWELLING (PREVIOUSLY APPROVED UNDER P/2015/0469)

LLEOLIAD/LOCATION: FORMER METHODIST CHAPEL, PONT Y BLEW, CHIRK, WREXHAM, LL14 5BH

Thank you for consulting Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) about the above, which we received on 12/02/2025.

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 and foul drainage. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Sites

River Dee and Bala Lake Special Area of Conservation (SAC)

- Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake 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 both the application form and the plans submitted that a new package treatment plant is to be installed to provide foul drainage for the conversion of the chapel to a three-bedroom dwelling. The development therefore has the potential to increase the amount of nutrients being discharged from the site. We note the Design and Access Statement (dated 2015) states*; 'Foul drainage will be via a sewage treatment unit which will*

allow clean discharge directly to the watercourse adjacent to the site.' However, the site plans (dated 2025) illustrate a package treatment plant, with shared use with the neighbouring property and an existing drainage field. Our response is therefore based on the understanding that the foul discharge for this proposal would be to ground as per drawing ref: SI 07/001 (dated January 2025). We note that the proposed drainage field would be within 40m of a surface water feature (Afon Ceiriog) which is part of the River Dee and Bala Lake SAC.

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 how foul wastewater will be managed with scale plans showing the location of the proposed private treatment system and drainage field. However, 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 i.e. '*where discharges to ground are proposed, developers should provide the results of infiltration testing with calculations to demonstrate that the drainage field size and design is appropriate for the volume of discharge proposed and follows the relevant British Standard*.'

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.

- Pollution Prevention

The application site is within 20m of the River Dee and Bala Lake SAC.

From the information provided, we consider that the proposal may affect the SAC and have identified construction pollution as a potential impact pathway to features of the site.

However, we consider the above pathway would not result in an adverse effect if the developer implements/adheres to standard pollution prevention guidelines. During the construction phase precaution should be taken to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages. For further guidance please refer to Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the NetRegs website.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for your Authority to carry out the test of Likely Significant Effects for the proposed development. Should you conclude that the proposal is likely to have a significant effect on a SAC, either alone or in combination with other plans or projects, an appropriate assessment must be made of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify.

River Dee Site of Special Scientific Interest (SSSI)

The application site is within 20m of the River Dee SSSI.

NRW consider the proposals have the potential to impact upon the River Dee SSSI. Providing the impact pathways referenced above for the River Dee and Bala Lake SAC are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded.

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,

Pauline Gallagher Brown
Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

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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.