

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

19/02/2021

Dear Sir/Madam,

PROPOSAL: CONVERSION OF THE PIGEON HOUSE INTO A CEREMONY BUILDING, CHANGE OF USE OF THE WALLED GARDEN FOR 10 BELL TENTS / YURTS, A SHEPHERDS HUT IN THE GROUNDS AND THE SITING OF A STORAGE AND SERVICE BUILDING IN THE CAR PARK

LOCATION: ISCOYD PARK HALL, GREEN ISCOYD, WHITCHURCH

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 05/02/2021.

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if the following requirements are met. Otherwise, we would object to this planning application.

Requirement 1 (Protected Sites and Foul Drainage): Further information is submitted to carry out a Habitat Regulation Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) prior to the determination of any planning application submitted.

Requirement 2 (Protected Species): We advise that a bat survey and report are required that assess the extent of adverse effects on any bats found to be present and any avoidance or mitigation measures required.

Protected Sites and Foul Drainage

On 21 January 2021 we issued a [planning position statement](#) regarding the deterioration in the condition of riverine Special Areas of Conservation (SACs) due to the potential to increase phosphate levels. The statement presents our planning view on the [published evidence](#), which shows the phosphate levels in the SAC are not compliant with targets set.

We note from the information submitted that a new septic tank is to be installed (the application form states they are not proposing to connect to the existing drainage system).

In our opinion, any planning application that is likely to increase the concentration of organic materials discharged directly or indirectly into the River Dee SAC catchment, has the potential to increase phosphate levels causing further deterioration. Therefore, development proposals must be able to demonstrate phosphate through the Habitat Regulations Assessment (HRA) process that there is unlikely to be a significant adverse effect on the SAC.

We consider that your Authority requires further information as set out in our interim advice ([Interim Planning Advice Following River SAC Compliance Report](#)).

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Should you also conclude that the proposed development is likely to have a significant effect on the national site network site, we look forward to being consulted on your appropriate assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Further, the Applicant should be made aware that to operate a private sewerage system, they will need to apply for an environmental permit or register an exemption with us.

Septic tanks and small sewage treatment works may be registered as exempt from the requirement to obtain an environmental permit if certain criteria are met. Please note, should a permit be required, further information may be required as part of that application and 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. 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 should ensure that they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site.

More information, including a step by step guide to registering and the relevant application forms are available on our [website](#). Where private sewage treatment/ disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations. We also refer the Applicant to Guidance for Pollution Prevention 4 on the [NetRegs website](#), which provides further information.

Protected Species

We believe that there is a reasonable likelihood of bats being present and the need for a bat survey and report before your Authority determines this application. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

Requirement 2 (Protected Species): We advise that a bat survey and report are required that assess the extent of adverse effects on any bats found to be present and any avoidance or mitigation measures required.

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.

Yours faithfully

Tristan Williams

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales