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Wrexham County Borough Council,
The Guildhall,
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northplanning@cyfoethnaturiolcymru.gov.uk

21/07/2022

Dear Sir/Madam,

**PROPOSAL: CONVERSION OF AGRICULTURAL BUILDINGS TO 2 HOLIDAY
ACCOMMODATION UNITS**

LOCATION: CAE MADOG, FFORDD YR YSGOL, GWYNFRYN, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales with additional information about the above, which we received on 13/07/2022.

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). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. As part of this package, we issued a [Planning Position Statement](#), in which we advised that any proposed development that might increase the amount of phosphate (or phosphorus) within a river SAC catchment could lead to damaging effects to the SAC. Therefore, such proposals should be screened through a Habitats Regulations Assessment (HRA), to determine whether they are likely to have a significant effect on the SAC. We have also issued [Planning Advice](#) (May 2021) which gives specific advice in respect of foul drainage arrangements for new developments.

In a previous response letter dated 07/09/2021 (our ref: CAS-163873-B0S1), we noted that foul water disposal is proposed via the installation of a package treatment

plant, rather than connecting to the mains sewer. However, the site appeared to be within a sewered area.

A subsequent letter from Welsh Water dated 29/10/2021 stated:

"Following a review of our public sewer infrastructure surrounding the proposed development site, we can confirm that the nearest suitable public sewer for connection is approximately 100 metres away to the North East of the development site.

Due to the ground depth levels from the proposed development to the public sewer there is a possibility that there will be a need for an onsite sewer pumping station and associated pumped rising sewer main."

We therefore confirmed that we are content that a connection to the mains sewer may not be feasible in this instance (response dated 11/02/2022, our ref: CAS-180076-Y5B2).

We note from the information submitted that the development has the potential to increase the amount of phosphorus being discharged from the site. As such, we refer you to our [Planning Advice](#) and advise you to seek further information from the applicant. We note that information has already been submitted in respect of proposed discharge to ground. 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. Please note the following in particular:

- *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.*

We have reviewed the two undated Drainage Reports. However, the submitted information fails to show that disposal of foul effluent would be effective at this location. The developer has not submitted any porosity/percolation testing results. Nor are there calculations for the specific size of any proposed foul soakaway(s) or the location of the discharge of foul effluent.

Therefore, the submitted information does not give any indication of the suitability of the ground for an infiltration system and no Percolation Value (Vp) has been provided. Testing should follow the protocol in BS6297 and not alternative test procedures which are specifically used for the design of surface water soakaways. Further information on this can be found in Appendix A of [guidance-for-pollution-prevention-4-2022-update.pdf \(netregs.org.uk\)](#)

Provided the above advice is followed and you are able to conclude that the development is not likely to have a significant effect on the SAC, we would have no objection to the proposal. However, should you conclude that the proposed development is likely to have a

significant effect on the SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Protected Sites

Special Area of Conservation (SAC)

From the information provided, we consider that the proposal is not likely to have a significant effect on the Berwyn and South Clwyd Mountains SAC.

Our advice may change should modifications be made to the proposed development prior to the determination of the application. If there are any changes to the proposed development which may affect the consideration of potential environmental impacts, please consult us again before you determine the application.

Site of Special Scientific Interest (SSSI)

Based on the information submitted in support of the above application, we consider that the proposed development is not likely to damage the features for which Llantysilio Mountains and Minera SSSI is of special interest.

Modifications to the scheme as currently proposed may affect our view and may merit a further consultation with us.

Protected Landscape

The development site lies in the upper Clywedog valley near Minera and Gwynfryn and within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) where the primary objective is the conservation and enhancement of natural beauty.

We have no objection to the proposal on protected landscape grounds. The existing farm buildings at Cae Madog have little visual influence upon views of the upper Clywedog Valley. Cae Madog is set on the northern slopes of the valley, below a lane that links the villages of Minera and Gwynfryn. The building roofscape is glimpsed but landform and vegetation otherwise conceal the buildings from this side of the valley.

Open views of the site are possible from the lane that climbs Esclusham Mountain on the opposite southern side of the valley. Dense overgrown hedgerow field boundaries next to the site partly screen the existing farm complex. This viewpoint is some 700m away from the site and rural settlement (the villages of Gwynfryn, Minera and farm complexes dotted in open countryside) are an established feature of the landscape.

Within this visual context, we consider the proposed conversion would result in very little discernible change to the character of the existing building and any change to the AONB views would not be significant.

The planting of a native species hedgerow (and the submission of a planting scheme) along the site's southern boundary along the new access track to where it meets the existing access track is however recommended, to screen new external uses of the site such as parking and the new access track.

Protected Species

We have reviewed the following submission:

- Stirling, P. (2021). Preliminary Bat Roost Assessment: Cae Madog. Arbor Vitae Environment Ltd. Unpublished

The assessment concluded: "*The proposed development will have no impact on bat species and mitigation will not be required.*"

We therefore have no further comment in relation to this aspect.

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