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

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northplanning@cyfoethnaturiolcymru.gov.uk

21/10/2022

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 05/10/2022.

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, further consideration is required regarding foul drainage. 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.

In line with our [Planning Advice](#) (July 2022), under the Habitats Regulations, Planning Authorities must consider the phosphorus 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.

The application, as submitted, proposes conversion of agricultural buildings to two holiday accommodation units. As such, this development is expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the SAC river catchment. We refer you to our Planning Advice and the section titled 'What types of non-residential development lead to increases in phosphorus discharges?'

We note that information has already been submitted in respect of a proposed new package treatment plant discharging to ground instead of the existing septic tank at the farmhouse that is “*in need of replacement*”.

We note that the percolation value (Vp) of 12 is not within the values of 15-100 advised within Appendix A of GPP4 'Treatment and disposal of wastewater where there is no connection to the public foul sewer' (as quoted below):

g) Drainage field disposals should only be used when percolation tests indicate average values of Vp between 15 and 100 and the preliminary assessment of the trial hole tests has been favourable.

h) The minimum value of 15 ensures that untreated effluent cannot percolate too rapidly into ground water.

Therefore, in order to attenuate the flow of effluent into the ground at the application site, it is recommended that the drainage field area is calculated using a Vp value of 15 and that a 700mm deep layer of medium or coarse, washed sand is laid on a permeable geotextile membrane, below the standard granular fill distribution layer.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine.

We therefore advise your Authority to undertake a Habitats Regulations Assessment (HRA). 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. You should then 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