

Ein cyf/Our ref: CAS-240852-S8H1
Eich cyf/Your ref: P/2023/0341

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 02 November 2023

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CODI ANNEDD GWEITHWYR AMAETHYDDOL A GWAITH
CYSYLLTIEDIG /
ERECTION OF AGRICULTURAL WORKERS DWELLING AND ASSOCIATED
WORKS**

**LLEOLIAD/LOCATION: LAND AT HIGHER LANES ISCOYD WHITCHURCH, Wrexham,
SY13 3AZ**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 20 October 2023.

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.

We also advise that based on the information submitted to date, the document identified below should be included in the approved plans and documents condition on the decision notice. Without the inclusion of this document, we would object to this planning application.

- **Approved Document:** Isherwood, M., September 2023, Preliminary Ecological Appraisal, Land at High Lanes, Arbor Vitae Environment Ltd

Foul Drainage and Protected Sites

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.

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 confirming a proposed private sewage system. 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.

Provided this 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 Species

We note that the ecology report submitted in support of the above application (Isherwood, M., September 2023, Preliminary Ecological Appraisal, Land at High Lanes, Arbor Vitae Environment Ltd.) identified that Great Crested Newts are unlikely to be present at the application site.

Section 4.4 of the report states that the Habitat Suitability Index scores of the ponds are poor but '*...due to the high rates of GCN occurrence within the Whitchurch area, a Reasonable Avoidance Measures Method Statement has been outlined in Section 6.2*'.

We concur with the avoidance and mitigation measures described in the report and advise that the report must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Furthermore, due to the density of ponds in the surrounding area we would welcome the inclusion of one-way amphibian fencing within the RAMs.

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

Rachael Burke

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
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.