

Ein cyf/Our ref: CAS-260818-P0K8
Eich cyf/Your ref: P/2023/0881

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 02 August 2024

Dear Sir/Madam,

PROPOSAL: CONVERSION OF BUILDING TO 2 DWELLINGS

LOCATION: BRYN YR EOS CHAPEL WHITEHURST CHIRK WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 18 July 2024.

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

Protected Sites

Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (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 recommend that the applicant contacts our [permitting service](#) at the earliest opportunity to apply for an exemption for the method of foul drainage proposed onsite.

We note from the information submitted that the development has the potential to increase the amount of nutrients being discharged from the site. 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 the location of the soakaway and percolation test results. However, we advise you to seek further information as identified in the section titled

'Can additional wastewater be discharged to existing private sewage treatment systems?' of that Advice.

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. 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.

Protected Species

We note that the Arbtech (30th May 2024) Preliminary Ecological Appraisal submitted in support of the above application has identified that bats are negligible in likelihood in using the application site. We therefore have no further comments to make on protected species and advise that you liaise with your own Authority's ecologist on the PEA.

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

Ruth Prichard

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.