



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-205640-K6P4
Eich cyf/Your ref: P/2022/0910

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

10/01/2024

Annwyl Syr/Madam / Dear Sir/Madam,

**BWRIAD / PROPOSAL: TRAWSNEWID AC YMESTYN ADEILAD I FFURFIO LLETY
GWYLIAU / CONVERSION AND EXTENSION OF BUILDING TO FORM HOLIDAY LET**

LLEOLIAD / LOCATION: OLD MILL WELSH SHOP, LLANARMON

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 21/12/2022.

We 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 and protected species (bats). 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). 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](#) (August 2023), 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 and extension of an existing building to form a holiday let. 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 also advise that confirmation is sought from

DC/WW with regards to the bullet points set out in the section 'What this means for development proposals involving connection to public wastewater treatment works?' of our Advice

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).

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

Protected Species

We note the additional information submitted in support of the above application (email by Susan Worsfold dated 29/01/2023) confirming that the bat droppings discovered were not Lesser Horseshoe Bats droppings, and that bat boxes on each side of the building would be beneficial. We would welcome these roosting provisions for crevice dwelling bats on different aspects of the building and advise you liaise with your Authority's Ecologist to confirm the suitability of any measures proposed.

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,

Rhys Jones

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