

Ein cyf/Our Ref: CAS-220917-H0T9
Eich cyf/Your Ref: P/2023/0076

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date : 13 July 2023

Dear Sir/Madam,

**PROPOSAL: DEMOLITION OF EXISTING EXTENSIONS AND ERECTION OF REAR
EXTENSION AND DETACHED GARAGE, RECONSTRUCTION OF FRONT PORCH**

LOCATION: THE OLD CROFT, GREEN STREET, HOLT, WREXHAM, LL13 9JF

Thank you for consulting Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) about the above, which we received on 23/06/2023.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome with the inclusion of a condition regarding Protected Species. Further details are provided below.

Protected Species

We note that the bat report submitted in support of the above application (Leigh Ecology Limited (12/06/2023) Bat activity Survey Report) has identified that bats are present at the application site. From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document '*Natural Resources Wales Approach to Bats and Planning (2015)*'.

We advise that the Bat Activity Survey is appropriate in principle however we recommend additional measures are implemented either upfront or via condition to the satisfaction of the Local Planning Authority. These could include bat roosting opportunities provided within the site by provision of several ibstock bat bricks within the external walls of the dwelling; and bat ridge boxes feature, lifted roof tiles which lead to a bat box within the roof space.

Provided these avoidance and mitigation measures are implemented, we consider that the proposed development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range:

Please consult us again if the plans are changed in ways that may harm or disturb the bats or their breeding sites and resting places at this site.

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 the application, as submitted, proposes a domestic extension e.g. extensions and garage i.e. an extension to a dwelling house comprising a single household. We refer you to our Planning Advice and the section titled 'What does this mean for domestic extensions?'

Ultimately it is a matter of judgment for you, as Competent Authority, to satisfy yourselves that the proposed development will not result in a significant effect on the SAC. Therefore, should your Authority conclude that the proposal is likely to have a significant effect on the River Dee and Bala Lake SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

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.

Yours faithfully

Ruth Prichard

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Tel: 0300 065 3787

E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

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.