

Ein cyf/Our Ref: CAS-220764-Y6L3
Eich cyf/Your Ref: P/2023/0361

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 06 July 2023

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD/PROPOSAL: TROSI YSGUBOR YN LLEOLIAD PRIODAS / CONVERSION OF BARN INTO WEDDING VENUE

LLEOLIAD/LOCATION: WILLINGTON LODGE, HORSEMANS GREEN, WHITCHURCH

Thank you for consulting Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) about the above, which we received on 21/06/2023.

We 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, a condition regarding protected species and biosecurity should be attached to any planning permission granted. Without the inclusion of these conditions, we would object to this planning application.

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](#) (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 there are no details of foul drainage arrangements for the conversion of the barn to a wedding venue, but the submitted plans show proposed seating for 76 people along with two bathrooms and four toilets. As such, we refer you to our Planning Advice and advise you to seek further information from the

applicant as identified in the section 'What does this mean for development proposals involving private sewage treatment' 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

Great Crested Newts (GCN)

We note that the ecological report submitted in support of the above application (Outbuilding at Willington Lodge, Wrexham, SY13 3BZ. Preliminary Ecological Appraisal and Bat Scoping Report. Leigh Ecology. 24/04/2023) has identified that impacts on ponds near to the development will be negligible.

However, we note that Great Crested Newts (*Triturus cristatus*) have previously been recorded in ponds located in the vicinity of the application site, but the potential presence of GCN within the application site does not appear to have been considered. This species is protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended).

We therefore advise that the following condition is attached to any planning permission granted for this proposal, to protect any GCN's occurring within the application site.

Condition 1: No development shall take place until a Great Crested Newt Reasonable Avoidance Measures scheme (RAMs) has been submitted to and approved in writing by the Local Planning Authority. The RAMs shall include, but not necessarily be limited to:

- further details and associated plans concerning Great Crested Newt avoidance and mitigation measures including, but not limited to, one-way amphibian fence design and locations (prior to and throughout the duration of any work).

The Reasonable Avoidance Measures scheme shall be carried out in accordance with the approved details.

Justification: To ensure that an approved Great Crested Newt Reasonable Avoidance Measures scheme is implemented, which protects Great Crested Newts affected by the development.

Should you be minded to grant permission for the above planning application without attaching the condition as described above to the permission, we ask that you notify us under the provisions contained in Section 28I of the Wildlife and Countryside Act.

The applicant should be aware that in the event of a Great Crested Newt being found on site during the work, all works should stop and NRW contacted for further advice. Operations

may only recommence after an appropriate licence has been issued by NRW and any conditions complied with.

Bats

We note that the bat report submitted in support of the above application (Outbuilding at Willington Lodge, Wrexham, SY13 3BZ. Bat Activity Survey Report. Leigh Ecology Limited. 03/07/2023) found that one Common Pipistrelle bat and one Soprano Pipistrelle bat were foraging within the barn, but were not considered to be roosting within it. We therefore have no comments to make on the application as submitted, and advise that you liaise with your own Authority's ecologist.

Biosecurity

We consider biosecurity to be a material consideration owing to the nature and location of the proposal. In this case, biosecurity issues concern invasive non native species (INNS) and diseases.

We therefore advise that any consent includes the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

We consider that this assessment must include:

- (i) appropriate measures to control any INNS on site; and
- (ii) measures or actions that aim to prevent INNS being introduced to the site for the duration of construction and operational phases of the scheme.

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

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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.