

Maes Y Ffynnon,
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Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

26/04/2022

Dear Sir/Madam,

PROPOSAL: CONVERSION OF BUILDING TO DWELLING

LOCATION: BLAENAU UCHAF, FRONCYSYLLTE, WREXHAM, LL20 7RY

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 11th April 2022.

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

Protected Sites and 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. As part of this package, we issued a [Planning Position Statement](#), in which we advised that any proposed development that might increase the amount of phosphate (or phosphorus) within a river SAC catchment could lead to damaging effects to the SAC. Therefore, such proposals should be screened through a Habitats Regulations Assessment (HRA), to determine whether they are likely to have a significant effect on the SAC. We have also issued [Planning Advice](#) (May 2021) which gives specific advice in respect of foul drainage arrangements for new developments.

We note from the information submitted that a new package treatment plant is to be installed to provide foul drainage for the conversion of the barn to a four-bedroom dwelling 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 location of package treatment plant and location of the drainage field. 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. We consider this should include:

- A percolation test to demonstrate the suitability of the ground conditions and required size of the soakaway.
- Where a new drainage field is proposed in close proximity to other known existing and proposed drainage fields, there is risk of the effectiveness of the drainage field(s) being compromised. Poor operation of drainage fields can lead to increased phosphorus discharges to SAC river systems. We therefore advise Planning Authorities to consider site conditions (such as proximity to adjacent drainage fields, soil type, depth to groundwater, distance to surface water features and SAC boundary etc) to determine with certainty that existing and proposed drainage fields will operate effectively in the future and prevent any increase in phosphorus from entering a river SAC.

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 bat report submitted in support of the above application (Star ecology (30/3/22) Bat and Nesting bird Assessment) has identified that no bats are present at the application site. We therefore have no comments to make with respect to protected species.

Protected Landscape

The development site lies within the Anglesey Area of Outstanding Natural Beauty (AONB) where the primary purpose is the conservation and enhancement of natural beauty.

Due to the scale and the location of the proposals, we consider that they are unlikely to significantly affect the purpose of the AONB. However, we would not rule out local landscape effects and recommend you seek the views of your internal landscape advisor.

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