

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

26/05/2022

Dear Sir/Madam,

BWRIAD / PROPOSAL: NEWID DEFNYDD O DIR AMAETHYDDOL I DWRISTIAETH AR GYFER GOSOD DAU GABAN A GWAITH CYSYLLTIEDIG / CHANGE OF USE OF AGRICULTURAL LAND TO TOURISM FOR THE SITING OF TWO LODGES AND ASSOCIATED WORKS

LLEOLIAD / LOCATION: TYN TWLL, TYN TWLL ROAD, LLANARMON DC, WREXHAM, LL20 7LH

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 9th May 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 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, the document identified below should be included in the approved plans and documents condition on the decision notice. Without the inclusion of this document, we would object to this planning application.

Approved Document: Stirling, P (September 2021) Preliminary Ecological Assessment – Land at Tyn Twll, Abor Vitae

Foul Drainage and 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. 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 (PTP) would be installed to provide foul drainage for the two holiday lodges. As such, we refer you to our [Planning Advice](#) and advise you to seek further information from the applicant. We note that information has been submitted in respect of the PTP discharging into a reedbed system. 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 draw your attention specifically to the following bullet points:

- confirmation of how foul wastewater will be managed;
- clear scale plans showing the location of the proposed private sewage treatment system and discharge location;
- evidence that Circular 008/2018 has been followed;
- Where discharges to ground are proposed, developers should provide the results of infiltration testing with calculations to demonstrate that the drainage field size and design is appropriate for the volume of discharge proposed and follows the relevant British Standard.

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 ecology report (Stirling, P (September 2021) Preliminary Ecological Assessment – Land at Tyn Twll, Abor Vitae) submitted in support of this application confirmed no protected species were found to be using the site.

The report must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Protected Sites

Special Protection Area (SPA)

From the information provided, we consider that the proposal is not likely to have a significant effect on the Berwyn SPA.

Our advice may change should modifications be made to the proposed development prior to the determination of the application. If there are any changes to the proposed development which may affect the consideration of potential environmental impacts, please consult us again before you determine the application.

Site of Special Scientific Interest (SSSI)

We have considered the information submitted in support of the above application. Based on the information submitted, we consider that the proposed development is not likely to damage the features for which Berwyn SSSI is of special interest.

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,

Rachael Burke

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