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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

25/02/2022

Dear Sir/Madam,

PROPOSAL: INSTALLATION OF NEW SINGLE STOREY SWIMMING POOL WITHIN GROUNDS WITH LINK TO EXISTING BARN

LOCATION: PLAS GRONO FARM, ERDDIG, WREXHAM, LL13 0YR

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 3rd February 2022.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Conservation Plan

Please note, without the inclusion of this condition we would object to this planning application. Further details are provided below.

European Protected Species

We note that the bat report submitted in support of the above application (Wake, K. (2022) Plas Grono, Erddig: Reasonable Avoidance Method Statement for Great Crested Newts. Enfys Ecology. (Unpublished Report Ref EE.756.22.2/kw), Wake, K. (2020) Plas Grono, Erddig: Bat Mitigation and Compensation Plan. Enfys Ecology. (Unpublished Report Ref EE.756.22.1/kw)) has identified that bats are present at the application site, and the habitats within the proposed works area were considered suitable for GCN. Bats, GCN and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

We advise that the proposed development is not likely to harm or disturb the bats, GCN or their breeding sites and resting places at this site, provided the conditions below will be attached to any planning permission for this scheme:

Condition: Conservation Plan: No development or phase of development, including site clearance, shall commence until a site wide species Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan should include:

- Build upon the principles outlined in (Wake, K. (2022) Plas Grono, Erddig: Reasonable Avoidance Method Statement for Great Crested Newts. Enfys Ecology. (Unpublished Report Ref EE.756.22.2/kw), Wake, K. (2020) Plas Grono, Erddig: Bat Mitigation and Compensation Plan. Enfys Ecology. (Unpublished Report Ref EE.756.22.1/kw)).
- Ecological Compliance Audit, including key performance indicators.
- Biosecurity Risk Assessment and Method Statement that considers invasive non-native species and specific diseases (e.g., Chytrid).

The species Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that an approved species Conservation Plan is implemented, which protects species affected by the development.

Provided these avoidance 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 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 received confirmation from the applicant (e-mail dated 22/2/2022) *“when the pool water is changed (which is infrequent) it will be pumped out to a lorry & disposed of at suitable premises/location, not into any watercourse and nor down any local drain.”*

However, as illustrated above the application as submitted is unlikely to increase the amount of phosphorus entering the catchment. Therefore, we are satisfied that the proposal is not likely to have a significant effect on the River Dee SAC.

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