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LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

17/08/2022

Dear Sir/Madam,

PROPOSAL: OUTLINE APPLICATION FOR ERECTION OF DWELLING (ALL MATTERS RESERVED)

LOCATION: GARREG LLWYD, FRONCYSYLLTE, LLANGOLLEN, LL20 7RY

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the additional information regarding the above, which we received on 02/08/2022.

We continue to 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.

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. 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 a new package treatment plant (PTP) would be installed to provide foul drainage for the rural enterprise dwelling. 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 point:

- For all other private sewage treatment systems, evidence that Circular 008/2018 has been followed.

Section 26 of the circular states: The assessment of private drainage proposals should include full and detailed consideration of the following factors:

g) Absence of suitable outlets: Any evidence to show there is no suitable facility such as satisfactory water courses (for a package treatment plant) or adequate land for soakage in the locality to accommodate the disposal of effluent from the proposed treatment plant(s) or septic tank(s) serving the new development.

h) Unsuitable soakage characteristics: Any results derived from percolation tests which have been carried out in accordance with BS 6297 or a subsequent superseding standard, (preferably carried out in winter conditions when the soils are saturated), which show the local soil conditions would preclude effective disposal of any sewage effluent from the proposed sewage treatment plant(s) or septic tank(s) serving the new development

We note the PTP is over 80m from a watercourse, however, no evidence has been submitted to justify why the PTP cannot discharge to ground via a drainage field, the next preferable option.

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 Landscape

The development site lies within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) where the primary objective is the conservation and enhancement of natural beauty.

NRW consider the proposal will not affect the purpose of the AONB (a small dwelling could be accommodated here without significant effect on the character of the AONB), however, there could be local issues to consider. We therefore advise that discussions are held with the Local Authority's landscape specialist.

We outline the following points to address within any reserved matters application to ensure the conservation and enhancement of the AONB:

- the block plan should show the canopy spread of existing trees (confirm the development does not intrude upon their root protection zones);

- the block plan should include a native species hedgerow along the northern boundary of the plot to help integrate the building within landscape views; and
- any external lighting is to be minimal to support the conservation of Dark Skies (lighting details need to be submitted).

Protected Species

We have reviewed the following submission:

- Stirling, P. (2021). Preliminary Ecological Appraisal: Garreg Llwyd. Arbor Vitae Environment Ltd. Unpublished

The report concluded the following in respect of bats and Great Crested Newt:

The habitats on site do not provide any potential roosting sites for bat species. The adjacent hedgerows provide limited opportunities and there are no records of bats within 1km of the site...

...There are no records of GCN within 1km of the site and the grassland on site does not offer suitable terrestrial habitat to GCN.

We therefore have no comments in relation to this aspect of the application.

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,

Rhys Jones

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