



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-190890-V6N8
Eich cyf/Your ref: P/2021/0888

Maes Y Ffynnon,
Penrhosgarnedd,
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LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

21/06/2022

Dear Sir/Madam,

BWRIAD / PROPOSAL: CODI BLOC O STABLAU NEWYDD, DARPARU MYNEDIAD, GWAITH CLODDIO A THIRLUNIO CYSYLLTIEDIG I DDARPARU BUSNES FFISIOTHERAPI I ANIFEILIAID / ERECTION OF NEW STABLE BLOCK, PROVISION OF ACCESS, ASSOCIATED EARTHWORKS AND LANDSCAPING TO PROVIDE "ANIMAL PHYSIOTHERAPY BUSINESS"

LLEOLIAD / LOCATION: BRYER, TREVOR HALL ROAD, GARTH, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales on the additional information about the above, which we received on 8th June 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 designated landscape. If this information is not provided, we would object to this planning application. Further details are provided below.

Designated Landscape

Area of Outstanding Natural Beauty (AONB)

The proposed site lies within the Vale of Llangollen in an open rural hillside below the settlement of Garth and 56m outside of the Clwydian Range and Dee Valley AONB. We note that the following further information has been submitted to address concerns set out in our previous letter dated 13/10/21 regarding development effects on the setting of the Clwydian Range and Dee Valley AONB:

- Proposed site plan with landscape layout: Drawing. No. PD218/02, June 2021
- Proposed cross-sections: Drawing. No. PD218/05, March 2022
- Landscape Scheme - V2 Real Planning, May 2022

The additional information demonstrates appropriate attention to the key landscape elements necessary to integrate the proposed new stable block and parking area with details for new landforms, hedgerow boundaries and tree planting.

However, Photo 2 (within the Landscape Scheme report) illustrates that previous landscape works at the site remain incomplete and unmanaged, with subsequent negative effects upon landscape character. Therefore, we advise that further information should be submitted to explain the restoration of the new landforms and areas of construction disturbance.

We advise that a revised Landscape Scheme report is submitted which includes information on:

- Preparation of the compacted areas of soil prior to grass-seeding of the earthworks;
- The proposed grass/wildflower seed mix, or tree species if proposed;
- Establishment method;
- Proposals for the long-term management of the restored areas including mowing/grazing regime and a works specification for the maintenance of the proposed Landscape Scheme.

We note that roofing materials are described as being dark grey / black in colour within section 7.8 of the Supporting Planning Statement (Bryer Stables, Trevor Hall Road, Garth, Wrexham. Real Planning: Version 2, September 2021) to comply with the Local Planning Authority Local Planning Guidance Note 7. We advise that the proposed RAL or BS:4800 colours should be submitted to and approved in writing by the Local Planning Authority.

Protected Species

We note that the ecological report submitted in support of the above application (Hodnett, T., May 2022, Planning Assessment Survey, Ecological Design Consultant) identified that protected species were not present within the application site.

We concur with the recommendations for lighting mitigation measures described in the ecological report and would welcome the inclusion of the report in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

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.

Any manure produced must be managed (storage and application to land) in line with [The Code of Good Agricultural Practice \(CoGAP\) for the Protection of Water, Soil and Air for Wales](#). If manure is managed correctly then 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 and Bala Lake 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.

Yn gywir / Yours faithfully,

Rachael Burke

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