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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: 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 additional information for the above, which we received on 13th 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 foul drainage. If this information is not provided, we would object to this planning application. Further details are provided below.

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) and reed bed system would be installed to treat foul drainage from the two holiday lodges. As such, we refer you to our [Planning Advice](#) and advise you to seek further information from the applicant 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 the exact location of the PTP;
- Confirmation of the maximum daily discharge from the proposal (*i.e.* whether it is less than 2m³);
- Details of percolation tests undertaken for the drainage field and details of the size of the drainage field required, and;
- Details of the exact location of the proposed drainage field and confirmation (shown on a plan) that any part of the drainage field will be a minimum of 40m from the nearest watercourse.

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 has confirmed that no protected species were found to be using the site. We therefore have no further comments to make regarding protected species.

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