



# **HABITAT REGULATION ASSESSMENT JUSTIFICATION**

**DEVELOPMENT:** Change of use of building from class b8 (storage) to class d1 (dog day care)

**LOCATION:** Stryt Yr Hwch  
Sontley  
Wrexham  
LL13 0YA

**CLIENT:** Mr R Williams

**Roger Parry & Partners LLP**  
**The Estates Office, 20 Salop Road, Oswestry, Shropshire, SY11 2NU**  
**Tel: 01691655334**  
**Email: richard@rogerparry.net**

*Also at: 11 Severn Street, Welshpool, Powys, SY21 7AG*  
*Tel: 01938 554499 Fax: 01938 554462*  
*email: welshpool@rogerparry.net*

*Also at: Hogstow Hall, Minsterley, Shrewsbury, SY5 0HZ*  
*Tel: 01743 791336 Fax: 01743 792770*  
*email: [mail@rogerparry.net](mailto:mail@rogerparry.net)*

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## **Screening Assessment**

This statement is prepared in consideration of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Natural Resource Wales Guidance as detailed below;

*Natural Resources Wales advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation (SACs)*

### **How do I know if a proposal might increase phosphorus levels within the SAC?**

Every development should be considered on a case by case basis. Developments should first be screened to determine whether they are likely to have a significant effect. The screening process should apply to developments within river SAC water body catchments and non-SAC tributaries flowing into them.

The following developments can be screened out as not likely to have a significant effect on a river SAC in relation to phosphorus inputs as there is unlikely to be a source of additional phosphorus or pathway for impacts:

- Any development that does not increase the volume of foul wastewater;

**Please see attached the DEFRA Animal licensing Legislation 2018 which is applicable in England. Our SOP's for cleaning are based on these guidelines, and through experience and industry standards in which the occupiers of the building are City and Guilds qualified as per the Pet Industry Federation. There will be minimal faecal matter or urine deposited into any water source, as any deposits directly onto the floor are collected and spot cleaned at the time of being deposited.**

**Please see guidance from the ALL 2018 under conditions 5.4 (suitable area for toileting) and Condition 9.5 re Disposal of faeces.**

**There will be several available "toileting zones" within the building to encourage dogs to toilet in specific areas. Please see attached photo (for example only) of the type of toileting areas to be used. All soiled absorbent debris, in the form of sawdust will be removed and placed into clinical waste daily.**

- Any development that improves existing water quality discharges by reducing the phosphorus load of wastewater, or by decreasing the volume of wastewater produced (e.g. by improvements to existing wastewater treatment infrastructure);

**The use of the shed as caravan storage would have resulted in the regular washing down of the caravans in the unit, possibly every weekend on their return to storage after use. The development proposed would result in an improvement of the existing water quality discharges by decreasing the volume of the wastewater produced. It must be considered that previous to this use, and the building could be put back into agricultural use. The**

**building housed 80 – 100 dairy cattle, and the volume of waste water and phosphorus load has been dramatically reduced.**

- Private sewage treatment systems discharging domestic wastewater to ground, built to the relevant **British Standard (BS 6297:2007+A1:2008)** as long as the maximum daily discharge rate is less than 2 cubic metres (m<sup>3</sup>), the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain and is located more than 50m from a SAC boundary.

**The NRW have already stated in their response dated 12/11/2021 that they are happy with our proposal of connecting to the existing foul water drainage system.**

- the drainage field is located more than 50m from a SAC boundary, and

**The drainage field is located more than 50m from the SAC Boundary.**

- the maximum daily discharge rate is less than 2 cubic metres (m<sup>3</sup>).

**The residential dwelling will produce 0.75 cubic meters of discharge based on the daily discharge calculator for domestic discharge**

- Also, to ensure that there is no significant in combination effect, the discharge to ground should be at least 200m from any other discharge to ground. The density of discharges to ground should also not be greater than 1 for every 4ha (or 25 per km<sup>2</sup>).

**There are no discharges to the ground within 200 metres of the proposed soakaway.**

### **Conclusion**

Based on the above the proposed change of use is not likely have an effect of the SAC as our development applies with the above criteria regarding private sewerage treatment plants and as such can be screened out as it is not likely to have a significant effect on a river SAC in relation to the phosphorus inputs as there is unlikely to be a source phosphorus or pathway for impacts.