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Wrexham County Borough Council,
The Guildhall,
Wrexham,
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ebost/email:
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04/02/2022

Dear Sir/Madam,

PROPOSAL: EXTENSION OF EXISTING CARAVAN SITE CONSISTING OF CARAVAN PITCHES WITH TARMAC ROAD, GLAMPING UNITS, SAFARI TENTS, CAR PARK, LINEN STORAGE SHED AND PATHS LINKING TO UNITS

LOCATION: CARAVAN SITE, LADY MARGARETS PARK, CHIRK, WREXHAM, LL14 5AA

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 26/01/2022.

We 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.

We also advise that based on the information submitted to date, a condition regarding biosecurity should be attached to any planning permission granted and the document identified below should be included in the approved plans and documents condition on the decision notice. Without the inclusion of this condition and document we would object to this planning application.

Approved document: Thomas, C. and Kibble, K. (2021). Lady Margaret's Park Extension, Chirk, Wrexham Preliminary Ecological Appraisal, CSA Environmental. Unpublished Report No CSA/1992/04b)

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 the development has the potential to increase the amount of phosphorus being discharged from the site. As such, we refer you to our [Planning Advice](#) and advise you to seek further information from the applicant. We note that information has already been submitted in respect of mains sewer connection. However, we advise you to seek further information as identified in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works' of that advice.

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 have reviewed the following submission:

- Thomas, C. and Kibble, K. (2021). Lady Margaret's Park Extension, Chirk, Wrexham Preliminary Ecological Appraisal, CSA Environmental. Unpublished Report No CSA/1992/04b)

We consider the survey and assessment to be satisfactory and concur with the conclusions (although there appears to be no consideration of biosecurity).

Bats and Great Crested Newts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

We consider that the 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. Furthermore, we advise that the proposed development is not likely to harm or disturb the bats or Great Crested Newts, or their breeding sites and resting places at this site, provided the avoidance measures described in the Preliminary Ecological Appraisal (section 5.11 - 5.12 for Great Crested Newt and Appendix E Bat Survey Report) are implemented.

The Preliminary Ecological Appraisal must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Please consult us again if the plans are changed in ways that may harm or disturb the bats and Great Crested Newts or their breeding sites and resting places at this site.

NRW would refer the Local Authority to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Biosecurity

We consider biosecurity to be a material consideration owing to the nature and location of the proposal. In this case, biosecurity issues concern invasive non-native species and diseases.

Condition: No development with the potential to impact on invasive species, shall commence until a Biosecurity Risk Assessment has been submitted to and approved in writing by the Local Planning Authority. The risk assessment shall include measures to control, remove or for the long-term management of invasive species both during construction and operation. The Biosecurity Risk Assessment shall be carried out in accordance with the approved details.

Justification: To ensure that an approved Biosecurity Risk Assessment is implemented to secure measures to control the spread and effective management of any invasive non-native species at the site.

Protected Sites

The application site is within 240m of Chirk Castle and Parkland 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 Chirk Castle and Parkland SSSI is of special interest.

Modifications to the scheme as currently proposed may affect our view and may merit a further consultation with us.

The application site is surrounded by restored Ancient Woodland and Plantation on Ancient Woodland Sites.

Please refer to our [Advice to planning authorities considering proposals affecting ancient woodland](#) (published 26 Nov 2021) for further information.

Landscape

The development site lies within 240m of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) where the primary objective is the conservation and enhancement of natural beauty. We consider the proposal will not affect the purpose of the

AONB, however there could be local issues due to the colour and scale of the development. We therefore advise that discussions are held with the local authority's landscape specialist.

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,

Tristan Williams

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