



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-173186-D9Y4
Eich cyf/Your ref: P/2021/0723

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

12/11/2021

Dear Sir/Madam,

BWRIAD / PROPOSAL: NEWID DEFNYDD O ADEILAD I DDOSBARTH B8 (STORFA) I DDOSBARTH D1 (GOFAL DYDD I GWN) / CHANGE OF USE OF BUILDING FROM CLASS B8 (STORAGE) TO CLASS D1 (DOG DAY CARE)

LLEOLIAD / LOCATION: STRYT YR HWCH FARM, SONTLEY, WREXHAM, LL13 0YA

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 2nd November 2021.

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.

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. 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 been submitted in respect of foul drainage connecting to a septic tank. However, there is insufficient information provided in relation to the drainage arrangements for the washing down from the covered exercise area within the barn. 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.

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 bat report submitted in support of the above application (Preliminary Ecological Appraisal, Stryt Yr Hwch, August 2019, Abor Vitae) has identified that Great Crested Newts were not using the application site. We therefore have no comments to make on the application as submitted.

Protected Sites

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 impact the features for which Sontley Marsh 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.

Advice for the Developer

Foul Drainage

Section 3 of Guidance for Pollution Prevention 24 (Stables, Kennels and Catteries) requires contaminated liquid runoff (wastewater) from dog kennels to go to public sewer where possible; this is not considered viable in this case as the site is not within a publicly sewered area.

As such, the wastewater should be treated via a private treatment plant, or septic tank, in accordance with Table 2 of [GPP24](#). Draining wastewater onto the surface to soak away would not accord with GPP24 as the used detergents would not be broken down by bacterial activity before draining into the soil.

The developer/applicant should ensure that the existing septic tank has sufficient capacity to accommodate any increase in flows from the proposed development. The Applicant should also be aware that to operate a private sewerage system, they will need to apply for an environmental permit or register an exemption with us. Septic tanks and small sewage treatment works may be registered as exempt from the requirement to obtain an environmental permit if certain criteria are met. Please note, should a permit be required, further information may be required as part of that application and the Applicant is therefore advised to hold pre-application discussions with our Permitting Team on 0300 065 3000, at the earliest opportunity, to try to ensure that there is no conflict between any planning permission granted and the permit requirements. It is important to note that a grant of planning permission does not guarantee that a permit will be granted, should a proposal be deemed to be unacceptable (either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible). The Applicant should ensure that they have all the required permissions, consents, permits and any other approvals in place.

More information, including a step by step guide to registering and the relevant application forms are available on our website [Natural Resources Wales / Water discharges and septic tanks](#).

We would also advise that the waste water resulting from this proposal would be classed as trade effluent and the Applicant is therefore advised that obtaining the correct bespoke permit for trade effluent is required. Further information on can be found at: [Natural Resources Wales / Apply for a new bespoke permit for water discharges](#)

Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standards 6297 and Approved Document H of the Building Regulations. We also refer the Applicant to Guidance for Pollution Prevention 4 on the NetRegs website, which provides further information.

Pollution Prevention

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages.

For further guidance please refer to GPP 5 and PPG 6 at the following link:

<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

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