



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-159352-K0G3
Eich cyf/Your ref: P/2021/0059

Maes Y Ffynnon,
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ebost/email:
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~~18/08/2021~~17/08/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CONVERSION OF REDUNDANT BARN INTO 1 DWELLING

LLEOLIAD / LOCATION: TYDDYN DEDWYDD, RHOSTYLLEN

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 15/07/2021.

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 protected sites and foul drainage. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Sites and Foul Drainage

We note the application site is within the catchment of the River Dee and Llyn Tegid 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 the proposed use of a Klargestar system and note that both the Graf advanced One2Clean and Klaro systems can be set up for phosphate removal, with an average

effluent value of 0.4 mg/l TP (=total phosphorus) and treatment efficiency 95% for both systems tested with +P dosing unit

We advise that for this to be acceptable, the Local Planning Authority (LPA), as Competent Authority under the Habitats Regulations 2017, will need to be satisfied that the amount / concentration of phosphate to be discharged from the development would not have an adverse effect on the integrity of River Dee and Llyn Tegid Special Area of Conservation (SAC). This will require site specific assessment and as such, we cannot provide a generic threshold of acceptability for phosphate discharges.

We therefore advise the submission of appropriate supporting information to the LPA to demonstrate that there would be no adverse effect on site integrity. NRW would then consider this evidence when consulted by the LPA as part of the Appropriate Assessment process and advise the LPA accordingly.

Prior to this, should you require more detailed advice from NRW, we advise that you submit a permit application (again, with supporting information to demonstrate no adverse effect on site integrity) and our Permitting Team can consider it further. More information, including a step by step guide to registering and the relevant application forms are available on our [website](#).

We also note from the applicant's letter that a consultant ecologist will be advising the applicant on mitigation measures (e.g. wetland construction) to mitigate any increased phosphorus discharges. We can provide further advice once in receipt of the additional information, however we would advise that the advice above is fully considered as part of the submission of any additional information.

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

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

Rhys Jones

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales