

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

07/01/2021

Dear Sir/Madam,

PROPOSAL: Change of use of stable to mixed A1 and A3 (Cafe, Shop, Bar)

LOCATION: Bowling Bank Farm, Mulsford Lane, Worthenbury, Wrexham

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 03/12/2020.

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if the following requirement is met and you include the following document within the condition identifying approved plans and documents on the decision notice. Otherwise, we would object to this planning application.

Requirement: Foul Drainage: Submission of additional information on foul drainage which demonstrates that proposed development will not affect the water environment.

Approved Plans/ Documents:

- Pearce Environment Ltd. Preliminary Bat Roost Assessment (PRA) Report - Bowling Bank Farm. June 2018.

Foul Drainage

The application is supported by the report 'Axis. Bowling Bank Farm – Application for Planning Permission for Conversion of Existing Stables to a Cafe, Shop and Bar (Comprising Change of Use to Mixed A1 and A3) and Provision of Car Parking, Landscaping and Other Ancillary Development at Bowling Bank Farm, Worthenbury Planning. Design and Access Statement. November 2020'.

Requirement: Foul Drainage: Submission of additional information on foul drainage which demonstrates that proposed development will not affect the water environment.

Arising from the report, further confirmation and clarification is necessary for NRW to be able to assess the foul drainage plan for the proposed development, as follows:

- Confirmation of the planned number of treatment plants to be installed as point 2.1.6 mentions “treatment plants” and “each treatment plant”.
- The report states under the same point that the “treatment plants have been sized to accommodate the maximum number of users of the ...facilities” and we would wish to see the number of users and how the size of treatment plant has been calculated.

Further information on foul drainage guidance is given in the ‘Advice for the Developer’ section.

Protected Species

We note that the bat report submitted in support of the above application (Pearce Environment Ltd. Preliminary Bat Roost Assessment (PRA) Report - Bowling Bank Farm. June 2018) has identified that while the application site offers negligible roosting potential for bats, the surrounding area offers good foraging and commuting habitat. From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document ‘*Natural Resources Wales Approach to Bats and Planning* (2015)’. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

As this is a lower risk case for bats, 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 their breeding sites and resting places at this site, provided the avoidance measures described in the bat report are implemented.

The report 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 any further information shows that this is no longer a lower risk case.

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](http://www.naturalresourceswales.gov.uk). 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:

The Applicant should note, it is a legal requirement 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.

If the Applicant already holds an exemption / permit, they should check whether the proposed increase in flows would require a further application to be made for a new / varied permit. 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 prior to commencement of works on the site.

More information, including a step by step guide to registering and the relevant application forms are available on our [website](#). Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 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.

If you have any queries on the above, please do not hesitate to contact us.

Yours faithfully,

Joy Evans

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