



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-129521-L8Z2
Eich cyf/Your ref: P/2020/0622

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd

LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

12/11/2020

Dear Sir/Madam,

BWRIAD / PROPOSAL: CONVERSION OF BARN TO FORM RESIDENTIAL DWELLING

LLEOLIAD / LOCATION: CAE BRYNER FARM, BOWLING BANK, WREXHAM LL139RL

Thank you for consulting Natural Resources Wales about the above, which we received on 12/10/2020.

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if the following requirement is met. Otherwise, we would object to this planning application.

Summary of Requirements:

Requirement (Protected Species – Bats): We advise that further information is required to assess the extent of adverse effects on the bats and any avoidance or mitigation measures required. This must demonstrate that the proposed development would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Protected Species

Bats

We note the bat report submitted in support of the above application (Cassidy, P. (2020). Bat Scoping Survey: Cae Bryner Farm). Although the report concludes that bats are not using the building to be converted, we note that bat potential (roosting features and droppings) were found during the survey. We advise that the bat report has insufficient information to assess the need for avoidance / mitigation measures. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

Requirement: Protected Species: We advise that further information is required to assess the extent of adverse effects on the bats and any avoidance or mitigation measures required.

This must demonstrate that the proposed development would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

No bat activity/emergence survey has been included with the application however potential roosting features as well as bat droppings were identified during the survey. We therefore recommend that an emergence survey is required and that an updated bat survey is submitted as a requirement for the purposes of informing the planning decision making process..

In the meantime, we are unable to give you any assurance that the proposal would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

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

The Applicant should 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 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

Rhys Jones

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