

FAO Sharon Holman

10/06/2019

Dear Sharon,

TOWN AND COUNTRY PLANNING ACT 1990
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**BWRIAD / PROPOSAL: CONVERSION AND ADAPTATION INCLUDING EXTENSION
OF EXISTING BUILDINGS, CONSTRUCTION OF STABLES AND CAR PORT
LLEOLIAD / LOCATION: Knolton Hall, Oswestry Road, Overton, Wrexham**

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 29/05/2019.

We recommend that you should only grant planning permission if you attach the following conditions. These conditions would address significant concerns that we have identified and we would not object provided you attach them to the planning permission.

Summary of Conditions

Condition 1: Submission and implementation of detailed bat reasonable avoidance measures (RAMs), to the satisfaction of the LPA.

Condition 2: The submission and implementation of an external lighting scheme that it compliant with the provisions of Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/18: Bats and Artificial Lighting in the UK.

Condition 3: Submission and implementation of a Biosecurity Risk Assessment.

Protected Species

It is noted that the a Preliminary Ecological Appraisal (Prestwood, W. (2019), Knolton Hall, Arbor Vitae Environment Ltd) has been carried out.

Great Crested Newts (GCN)

We note the GCN reasonable avoidance measures (RAMs) outlined in appendix 2, in addition to the measures outlined we advise that the RAMs also include erection of one way fencing.

Bats

We note the evidence of bats in the loft of building 3. It is considered necessary to submit and implement Bat reasonable avoidance measures scheme to include timing, noise curtailment and exclusion of working within area(s) considered to be occupied by bats.

Condition 1: Submission and implementation of detailed bat reasonable avoidance measures (RAMs), to the satisfaction of the LPA.

Lighting is an important consideration for bats, as it has the potential to cause direct disturbance and or illuminate habitats that are in use by the species. We therefore advise that a lighting scheme is submitted to the Local Planning Authority in order to reduce the potential disturbance of lighting on the European Protected Species.

Condition 2: The submission and implementation of an external lighting scheme that it compliant with the provisions of Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/18: Bats and Artificial Lighting in the UK.

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 (INNS) and diseases.

Condition 3: Submission and implementation of a Biosecurity Risk Assessment.

We consider that this assessment must include:

- (i) appropriate measures to control any INNS on site; and
- (ii) measures or actions that aim to prevent INNS being introduced to the site for the duration of construction and operational phases of the scheme.

Please do not hesitate to contact us if you require further information or clarification on any of the above.

Our comments above only relate specifically to matters that are listed in our 'Consultation Topics' document (September 2018) which is published on our website: (<https://cdn.naturalresources.wales/media/686847/dpas-consultation-topics-august-2018-eng.pdf?mode=pad&rnd=131819256840000000>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance

Advice to Applicant

Pollution Prevention

All works at the site must be carried out in accordance with PPG6: 'Working at construction and demolition sites' which are available on the following website:

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

Waste produced during construction

Waste produced during the construction phase of your development must be dealt with appropriately and be in line with all relevant waste legislation including Duty of Care Regulations and Hazardous Waste Regulations. As part of your waste duty of care you must classify the waste produced:

- before it is collected, disposed of or recovered
- to identify the controls that apply to the movement of the waste
- to complete waste documents and records
- to identify suitably authorised waste management options
- to prevent harm to people and the environment.

Any waste removed from site will be subject to waste management controls. The links below provide information on how to classify waste and register as a waste carrier or hazardous waste producer:

<https://naturalresources.wales/permits-and-permissions/waste/?lang=en>

<https://naturalresources.wales/permits-and-permissions/waste/waste-permits/?lang=en>

Further guidance can be found on the GOV website here:

<https://www.gov.uk/managing-your-waste-an-overview/duty-of-care>

Foul Drainage

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 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 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.

The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales