

FAO Kevin Hughes

18/02/2019

Dear Kevin,

TOWN AND COUNTRY PLANNING ACT 1990
DEDDF CYNLLUNIO GWLAD A THREF 1990

**BWRIAD / PROPOSAL: CHANGE OF USE OF EXISTING STORE BUILDING AND
EXTENSIONS TO FORM RESIDENTIAL ACCOMMODATION**
LLEOLIAD / LOCATION: Ddol Hir Caravan Park, Glyn Ceiriog, Llangollen.

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 31/01/2019. NRW has no objection to the proposal, however we would provide the following advice.

Protected Sites

From the information provided, NRW consider that the proposals may affect the River Dee and Bala Lake SAC/ River Dee SSSI. The application is located within 5m of the SAC/SSSI.

NRW have identified potential impact pathways to features of this site:

1. Pollution into the water course

The above pathways may not result in a likely significant effect if the following measures are adhered to/ implemented:

1. Developer adheres to pollution prevention guidelines:

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and GPP6: 'Works in, near or over watercourses' and '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/>

During the construction phase the developer 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.

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

No assessment of likely significant effect under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 has been undertaken by your authority or it has not be forwarded to NRW for consideration. Should you conclude that the proposed development is likely to have a significant effect on the European site, we look forward to being consulted on your appropriate assessment. In the absence of this assessment, NRW cannot offer assurances that the proposals would not result in an adverse effect upon the SAC.

The Wildlife and Countryside Act 1981 (as amended) places a duty on public authorities in exercising their functions, so far as this is likely to affect the flora, fauna, geological or physiographical features of a SSSI, to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of those features.

By satisfying the requirements regarding the SAC, as indicated above, it is likely the requirements for the SSSIs will also be met.

Protected Species

We note that there are records of otter in close proximity of the site. We note that there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

Foul Drainage

We note the intention to connect to the existing septic tank. We have no record of a septic tank on site, either for the main existing buildings or the caravan park itself. 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. The Applicant must obtain any necessary permit or exemption prior to commencement of work on site. Septic tanks and small sewage treatment works may be registered as exempt from the requirement to obtain an environmental permit if certain criteria is 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.

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

[Pollution Prevention Guideline 4](#) which provides further information.

Flood Risk

This application site sits within Development Advice Map (DAM) Zone A, outside of Zone C2, and within 10 metres of the River Ceiriog.

The proximity of the River Ceiriog and historical flood map outline across the Ddol Hir caravan park suggests that it's an area, which has historically flooded and it would be advisable for the conversion scheme for the holiday let scheme to incorporate flood resilience measures into, and occupiers of the building and site are aware of flood risk, through a flood evacuation plan, appropriate site signage and information.

Further information on flood resilience measures is available from
<http://bluepages.org.uk/tag/property-level-protection/>
<http://nationalfloodforum.org.uk>

This advice is provided on the basis of the proposed conversion forming a holiday let, as part of a wider caravan site and not a separate residential dwelling.

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>

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.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales