

Sharon Holman
Planning Control Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Date: 2nd August 2017

Dear Ms Holman,

**CONVERSION OF BARN TO HOLIDAY LET INCLUDING REBUILDING OF EXISTING OUT-
RIGGER AND NEW ROOF
CAE HAIDD, OLD ROAD, BWLCHGWYN, WREXHAM, LL11 5UF**

Thank you for consulting us on the above application, which we received on the 18th July 2017.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirement. We would object if the scheme does not meet this requirement:

Requirement - two bat emergence surveys to be carried out before the end of September.

Protected Species

We note that the bat report submitted in support of the above application (Cae Haidd, Old Road Bwlchgwyn, Wrexham, LL15 5UF: Inspection and Assessment in Relation to Bats. The Tyrer Partnership. Unpublished) has identified the moderate potential for bats to be present at the application site.

Bats and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2010 (as amended). Any development that would contravene the protection afforded to bats under the Regulations would require a derogation licence from Natural Resources Wales. A licence may only be authorised if:

- i. There is no satisfactory alternative and
- ii. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. In addition,
- iii. the development works to be authorised must be for the purposes of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.

Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning (TAN5) states that your Authority should not grant planning permission without having satisfied itself that the proposed development either would not impact adversely on any bats on the site or that, in its opinion, all three conditions for the eventual grant of a licence are likely to be satisfied.

Requirement - two emergence surveys to be carried out before the end of September.

Although a bat report has been submitted, we consider that there is not enough information to assess potential effects of the proposal on the bats present at this site. We consider that the following additional information is required to assess the extent of adverse effects on the bats:

The report recommends two emergence surveys. These recommended surveys have not been carried out. We agree with the recommendations of the bat report that identify the need for two emergence surveys to be carried out before the end of September.

Therefore, we object to the development as currently proposed, and recommend planning permission is refused until it can be demonstrated that the proposed development will either not harm or disturb the bats or their breeding sites and resting places at this site, or all 3 conditions for the eventual grant of a licence under the Conservation of Habitats and Species Regulations 2010 (as amended) are likely to be satisfied.

Foul Drainage

Due to the seasonal nature of the development, and the need for the treatment plant to receive a constant flow of nutrients to operate satisfactorily, the applicants may wish to investigate installing a septic tank/soakaway system as an alternative to a treatment plant.

The location of the treatment plant has not been specified. The treatment plant and any soakaway system should be located at least 10 metres from any watercourse, and over 50 metres away from any spring or well. If it is intended for the treatment plant to discharge to a watercourse, this must have a constant, sufficient flow through the year, for adequate dilution of the effluent.

The private foul drainage system associated with this development will require an Environmental Permit under the Environmental Permitting Regulations 2010, from Natural Resources Wales, unless an exemption applies. The applicant is advised to contact Natural Resources Wales on 0300 065 3000 for further advice and to discuss the issues likely to be raised. The applicant should be aware that a permit may not be granted. Additional guidance on 'Environmental Permitting' can be accessed:

<http://naturalresources.wales/permits-and-permissions/water-discharges/discharges-to-surface-water-and-groundwater/?lang=en>

Our comments only relate specifically to matters that are included on our checklist "Natural Resources Wales and Planning Consultations" (March 2015) which is published on our website: (<https://naturalresources.wales/media/5271/150302-natural-resources-wales-and-planning-consultations-final-eng.pdf>). 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. Any site owner/developer 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.

We advise that in addition to planning permission, it is the applicant's responsibility to ensure that they secure all other permits/consents relevant to their development.

If you have any queries concerning the above, please contact me on the details below.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

Cynghorydd Cynllunio Datblygiad / Development Planning Adviser

Ebost/Email: NorthPlanning@cyfoethnaturiolcymru.gov.uk

Deialu uniongyrchol/Direct dial: (0300) 065 3786 **Siaradwr Cymraeg / Welsh Speaker** 

cc: Blueprint dafydd@blueprintarchitectural.com