Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-283761-Y5G9
Eich cyf/Your ref: P/2025/0496

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 30 July 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: INSTALLATION OF SOLAR PV PANELS (TOTAL NUMBER 30)

LLEOLIAD/LOCATION: HAFOD FARM, NEW BRIGHTON, MINERA, WREXHAM, LL11 3DR

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 30 June 2025.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected sites. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Sites

Ruabon / Llantysilio Mountains and Minera Site of Special Scientific Interest (SSSI)

The application site lies within 20m of the Ruabon / Llantysilio Mountains and Minera SSSI.

We have considered the information submitted in support of the above application. We have concerns that the proposed development, as submitted, will damage the features for which the Ruabon / Llantysilio Mountains and Minera is of special interest. We therefore recommend that planning permission should only be granted if the scheme is modified as specified below to avoid damage to the SSSI features.

We would object to the planning application if these changes are not made to the scheme.

Paragraph 6.4.26 of *Planning Policy Wales* states development should be refused where there are adverse impacts on the features for which a site has been designated.

- *Impact on mobile species features of the SSSI*

The area to the northwest of the farm is a known curlew and black grouse territory and any fragmentation in the nearby habitat could have a negative impact on these populations.

We therefore advise that the proposed solar panels should be fitted on available roof spaces as opposed to being mounted on the ground.

Your Authority may also wish to consider whether the number of proposed solar panels at this location is suitably justified for domestic use.

- *Pollution Prevention*

We have identified pollution during the construction phase as a potential impact pathway to the protected site. However, we consider the above pathway would not result in an adverse effect it the developer adheres to standard pollution prevention guidelines.

During the construction phase precaution should be taken 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. For further guidance please refer to Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the NetRegs website.

Should you be minded to grant permission for the above planning application without requiring the specified modifications, we ask that you notify us under the provisions contained in Section 28I of the Wildlife and Countryside Act 1981 (as amended).

Berwyn and South Clwyd Mountains Special Area of Conservation (SAC)

NRW consider the proposals have the potential to impact upon the Berwyn and South Clwyd Mountains SAC, located approximately 60m from the application site. Providing the impact pathways referenced above for the SSSI are adequately addressed, NRW consider the features of the SAC will also be adequately safeguarded.

River Dee and Bala Lake SAC

We note the application site is within the catchment of the River Dee and Bala Lake SAC. In line with our *Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation* (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

However, recognising the specific nature of the application submitted i.e. no foul sewerage required, we are satisfied that there is unlikely to be a source of additional nutrients and/or a pathway for impacts. As such, in our opinion, it would be reasonable for your Authority to screen out this proposal as not likely to have a significant effect on the River Dee and Bala Lake SAC in relation to nutrient inputs.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), your authority must, before deciding to give consent for a project which

is likely to have a significant effect on a SAC, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC.

Designated Landscape

The development is situated within the Clwydian Range and Dee Valley National Landscape (AONB). We note that there is no information regarding landscape assessments with the application and therefore, we are assuming that your Authority has screened the application and concluded that any impacts on landscape are unlikely and the proposal is in line with Planning Policy Wales. If you require further advice, then please reconsult us.

Protected Species

No ecological information has been submitted in support of this application. We recommend you seek the advice of your Authority's ecologist about the requirement for further information to be submitted in support of the application, and to scope the need for bespoke surveys, where required

Other Matters

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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.

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

Yn gywir / Yours faithfully,

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

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.