Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-285595-K5W5
Eich cyf/Your ref: P/2025/0409

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 16 September 2025

Dear Sir/Madam,

PROPOSAL: DEMOLITION OF EXISTING HOUSE AND REDUNDANT FARM BUILDINGS AND CONVERSION OF RETAINED BARN WITH EXTENSION TO FORM REPLACEMENT DWELLING

LOCATION: CAE COCH, GOLLY, ROSSETT, WREXHAM, LL12 0AL

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 20 August 2025.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Condition 1: Protected Sites

We also advise that based on the information submitted to date, the document identified below should be included in the approved plans and documents condition on the decision notice.

- **Approved Document: Section A1.1.2.3. New Roost Creation, Protected Species Survey (Bats), Cae Coch, Golly, dated July 2025, by PJ Ecological Solutions**

Without the inclusion of this condition and document we would object to this planning application.

We also advise that further consideration is required regarding foul drainage. Further details are provided below.

Protected Species

We have reviewed the following information submitted in support of the application:

- Preliminary Ecological Appraisal, Cae Coch, Golly, Rossett, dated May 2025 by PJ Ecological Solutions.

- Ecological Appraisal, Cae Coch, Golly, Rossett, dated July 2025, by PJ Ecological Solutions.
- Protected Species Survey (Bats), Cae Coch, Golly, dated July 2025, by PJ Ecological Solutions.
- Protected Species Survey (Great Crested Newts), Cae Coch, Golly, dated July 2025, by PJ Ecological Solutions.
- Planning – Proposed Site Plan Based On Topo, Revision B, Drawing Number 4246/1, dated 16/04/2025.

Bats

We note that the Protected Species Survey (Bats) has identified that the application site supports a roost for whiskered/Brandt's and common pipistrelle bats. The roost is located within the existing main dwelling that is proposed for demolition.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

We consider that the above report provides an adequate basis upon which to consider the potential impacts of the scheme on this species and inform the decision-making process.

We welcome the inclusion of a bespoke bat loft above the garage building, and that built in bat boxes incorporated into the walls of the proposed garage are to be installed as compensation for the loss of the bat roosts on site.

We consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range provided the measures set out in the submitted report are implemented.

Therefore, we advise that the following document is included in the approved list of plans / documents condition within the decision notice:

- Section A1.1.2.3. New Roost Creation, Protected Species Survey (Bats), Cae Coch, Golly, dated July 2025, by PJ Ecological Solutions

We note that the proposed bat loft has not been included within the submitted plans for the development and therefore advise that you consult your internal ecological advisor in this regard.

Great Crested Newt (GCN)

We note that the Protected Species Survey (Great Crested Newts) has identified that GCN are present in a pond located within 40m of the application site.

GCN and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981. Where GCN are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

i. The development works to be authorised are for the purpose 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;
ii. There is no satisfactory alternative; and,
iii. 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.

To avoid developments with planning permission subsequently not being granted a licence, the Local Planning Authority should take Planning Policy Wales and Technical Advice Note 5 into account when considering development proposals where a European Protected Species is present.

Please note, for the purposes of providing advice at the planning application stage, our comments are limited to compliance with the 3rd test "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species". We advise that before any consent is given, as informed by the provisions of Regulation 9 of the Conservation of Habitats and Species Regulations 2017 (as amended) the LPA satisfy itself as to whether the scheme satisfies the other two tests, namely a relevant Habitats Regulations purpose and whether there is no satisfactory alternative to the proposal.

We consider that the above report provides an adequate basis upon which to consider the potential impacts of the scheme on this species and inform the decision-making process.

Due to the proximity of the confirmed GCN record in the pond, we advise that there is a reasonable likelihood that GCN will be present on site. We therefore welcome the measures as described within Section 5 'Required Actions' of the submitted GCN survey report.

However, we advise that further information is required to manage the potential impacts of the scheme. We would be content for this further information to be provided via a suitably worded condition.

We therefore advise the following condition in respect of GCN is included on any permission granted.

Condition: No development, including site clearance, shall commence until a Great Crested Newt (GCN) plan of reasonable avoidance measures has been submitted to and approved in writing by the Local Planning Authority. The plan of reasonable avoidance measures should include, but not necessarily be limited to:

- submission of detailed GCN / amphibian reasonable avoidance measures, and associated plans including, fencing location, design and specifications; consideration of human access issues across fence lines; details concerning the removal or

displacement of individuals from working areas; fence monitoring and maintenance requirements; and supervised removal of barrier fences.
- details of timing, phasing and duration of construction activities and conservation measures

The plan of reasonable avoidance measures shall be carried out in accordance with the approved details.

Justification: To ensure that GCN are protected by the development.

We also advise that the works are carried out under licence. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Protected Sites and Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (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. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note from the information regarding percolation tests carried out has been submitted and the proposal is to discharge to watercourse as the ground is unsuitable for a drainage field.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. We therefore advise you to take the above into account in your determination of whether the development is likely to have a significant effect on the SAC. Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity.

Advice to Developer

Applicants wishing to operate a private sewerage system will need ***either*** to apply to us for an environmental permit ***or*** register with us for an exemption from the permit requirement. Septic tanks and small sewage treatment works that meet certain criteria may be registered as exempt.

A step by step guide to registering an exemption can be found on our website.

If the septic tank or private sewage treatment system is not eligible for an exemption, the Applicant will need to apply for an environmental permit, further details can be found here. Should a permit be required further information may be needed as part of that application process. The Applicant is therefore advised to contact us for pre-application advice at the

earliest opportunity to try to ensure that there is no conflict between any planning permission granted and the permit requirements. Further details on how to access our pre-application advice service can be found here.

It is important to note that a grant of planning permission does not guarantee that a permit will be granted. A proposal may be deemed unacceptable either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible. Applicants are encouraged to ensure they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site.

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.

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.

Yours faithfully,

Rachael Burke
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.