Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our Ref: CAS-288453-P2C2
Eich cyf/Your Ref: CAS-288453-P2C2

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 02 October 2025

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD/PROPOSAL: CHANGE OF USE OF BARN TO DWELLING

LLEOLIAD/LOCATION: WILLINGTON LODGE, HORSEMANS GREEN, WHITCHURCH

Thank you for consulting Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) about the above, which we received on 15/09/2025.

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 foul drainage. If this information is not provided, we would object to this planning application. Further details are provided below.

We also advise that based on the information submitted to date, a condition regarding protected species should be attached to any planning permission granted. Without the inclusion of this condition, we would object to this planning application.

Protected Sites – 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 submitted that the foul drainage for the conversion of the barn to a four-bedroom dwelling is to be connected to the existing private foul drainage system. As such, we refer you to our Advice and advise you to seek further information from the applicant. We note that information has already been submitted in respect of showing the existing drainage field to be in close proximity to a watercourse. However, we

advise you to seek further information as identified in the section titled *'Can additional wastewater be discharged to existing private sewage treatment systems?'* of that Advice.

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.

Great Crested Newt

We have reviewed the following information which has been submitted in support of the application: Outbuilding at Willington Lodge, Wrexham, SY13 3BZ. Preliminary Ecological Appraisal and Bat Scoping Report. Leigh Ecology. 24/04/2023.

The information has identified that great crested newts (GCN) are material to 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.

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.

The report has identified that impacts on ponds near to the development will be negligible. However, we note that Great Crested Newts (*Triturus cristatus*) have previously been

recorded in ponds located in the vicinity of the application site, but the potential presence of GCN within the application site does not appear to have been considered.

We advise that further information is required to manage the potential impacts of the scheme. However, 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 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:

- further details and associated plans concerning Great Crested Newt avoidance and mitigation measures including, but not limited to, one-way amphibian fence design and locations (prior to and throughout the duration of any work).

- submission and implementation of a Biosecurity Risk Assessment to include appropriate measures to control any INNS on site, and measures or actions that aim to prevent INNS being introduced to the site for the duration of construction and operational phases of the scheme.

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.

Bats

We note that the bat report submitted in support of the above application (Outbuilding at Willington Lodge, Wrexham, SY13 3BZ. Bat Activity Survey Report. Leigh Ecology Limited. 03/07/2023) found that there was no evidence of bat emergence or roosting within the building. We therefore have no comments to make on the application as submitted, and advise that you liaise with your own Authority's ecologist.

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.

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Yn gywir / Yours faithfully,

Rhys Jones
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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.