

Ein cyf/Our ref: CAS-289771-G4J1
Eich cyf/Your ref: P/2023/0473

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 27 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: TRAWSNEWID ADEILAD FFERM I ANNEDD (RHANNOL OL-WEITHREDOL) / CONVERSION OF FARM BUILDING TO DWELLING (PARTLY IN RETROSPECT)

LLEOLIAD/LOCATION: CEFN FARM, CEFN ROAD, BWLCHGWYN, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 06 October 2025.

We have concerns with the application as submitted. To overcome these concerns further consideration is required regarding foul drainage. Further details are provided below.

We also continue to have concerns with the application as submitted regarding protected species. However, we are satisfied that these concerns can be overcome if the document identified below is included in the approved plans and documents condition on the decision notice:

- Reid, M. (2025). Proposed bat mitigation and compensation for Cefn Farm. Arbtech

Please note, without the inclusion of this document we would object to this planning application. Further details are provided below.

Foul Drainage and Protected Sites

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (August 2023), under the Habitats Regulations, Planning Authorities must consider the phosphorus 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 a new private treatment plant (ptp) is to be installed to provide foul drainage for the conversion of farm building to dwelling, with the ptp discharging to surface water. Therefore, the development has the potential to increase the amount of nutrients being discharged from the site. As such, we refer you to our [Advice](#) and advise you to give further consideration to the section 'What does this mean for development proposals involving 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.

We note there is an existing septic tank in place for the existing dwelling adjacent to the proposed development. The proposed PTP is in close proximity to the existing discharge and this will need to be considered by permitting.

Details on applying for a permit can be found [here](#). Further information may be needed as part of the permit 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 because of environmental risk. 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.

Protected Species

The arbtech (14/07/2023) bat emergence survey identified that from surveys carried out in 2017 the application site previously supported a day roost for common pipistrelle bats. Works carried out without a European Protection Species Licence prior to the 2023 report had destroyed the day roost.

Following our response (dated 14/08/2023), we have reviewed the additional information submitted:

- Reid, M. (2025). Proposed bat mitigation and compensation for Cefn Farm. Arbtech.

The submitted information addresses our concerns regarding:

- a.) Roofing membranes
- b.) Functionality and use of the site by bats; and
- c.) Additional mitigation measures for bats

Although the submission is limited in detail, given the limited number of bats previously onsite, we consider the information to be satisfactory and therefore addresses our previous concerns.

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

- Reid, M. (2025). Proposed bat mitigation and compensation for Cefn Farm. Arbtech.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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.