Woodsyde Developments Limited

Development Consultants

Woodsyde Developments Ltd

Directors: Mr A W Gough
Mrs L M Gough

Development Management Planning Officer
Wrexham County Borough Council
Lambpit Street
Wrexham
LL11 1AR.

27th October 2025

Dear Sir/Madam,

Proposed Extension and Remodelling Works to Existing Farm Cottage at Old Farm, Bowling Bank, Wrexham, LL13 9RT.

We are in receipt of the preapplication response and comments offered by Sarah Duckworth – Planning Officer, in respect of the above site.

Reference is made to the location of the site situated within the catchment for the River Dee and Bala Lake Special Area of Conservation (SAC). In accordance with LDP policy NE6 and UDP policy EC14, development will only be permitted where there would be no adverse impact on the integrity of the SAC from wastewater and in particular, increases in phosphorus entering the SAC. This resume should hopefully provide the justification of the use of the existing private foul water treatment system, its impact on the SAC and confirmation that the proposals are in-line with the requirements of the Welsh Government Circular 008/2018 and NRW's advice to planning authorities for planning applications affecting phosphorus sensitive Special Areas of Conservation.

The existing dwelling currently has 3 bedrooms and we have been advised by the client that it is served by an existing sewage treatment plant and drainage field, which was installed approximately 5 years ago. The proposals are for an extension to the existing dwelling, but there will be no increase in the number of bedrooms. In accordance with Flows and Loads 4, the size of a foul water treatment system for a 3 bedroom house should be designed for an occupancy level of 5 persons. It is believed that the existing sewage treatment plant is based on a minimum of 5 persons in accordance with Building Regulations and Flows and Loads 4. This outfalls to an existing suitably sized drainage field as the ground is free draining.

The management and maintenance arrangement is already clearly set out by the applicant who already undertakes regular inspections and annual maintenance and emptying.

The land in which the existing foul water drainage field sits is an existing paddock to the west of the existing dwelling, which is laid to permanent pasture and is not therefore treated with any farm manure or other manmade fertiliser. This is an existing drainage field which will not be extended and we understand from discussion with the applicant that there have been no problems over the number of years this system has been operational and the cleaned effluent soaks away satisfactorily.

We consider that the use of the existing sewage treatment plant will not cause any additional effect upon the integrity of the River Dee and Bala Lake Special Area of Conservation (SAC) as the status quo remains. The existing private foul water treatment system is in accordance

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with BS6297:2007+A1:2008, with a suitably sized drainage field. The maximum daily discharge through the system will be less than 2 cubic metres and will serve the existing 3 bedroomed property post development. As the existing septic tank is sized for the proposals, the drainage field size is also considered to be suitable and designed for the volume of discharge proposed.

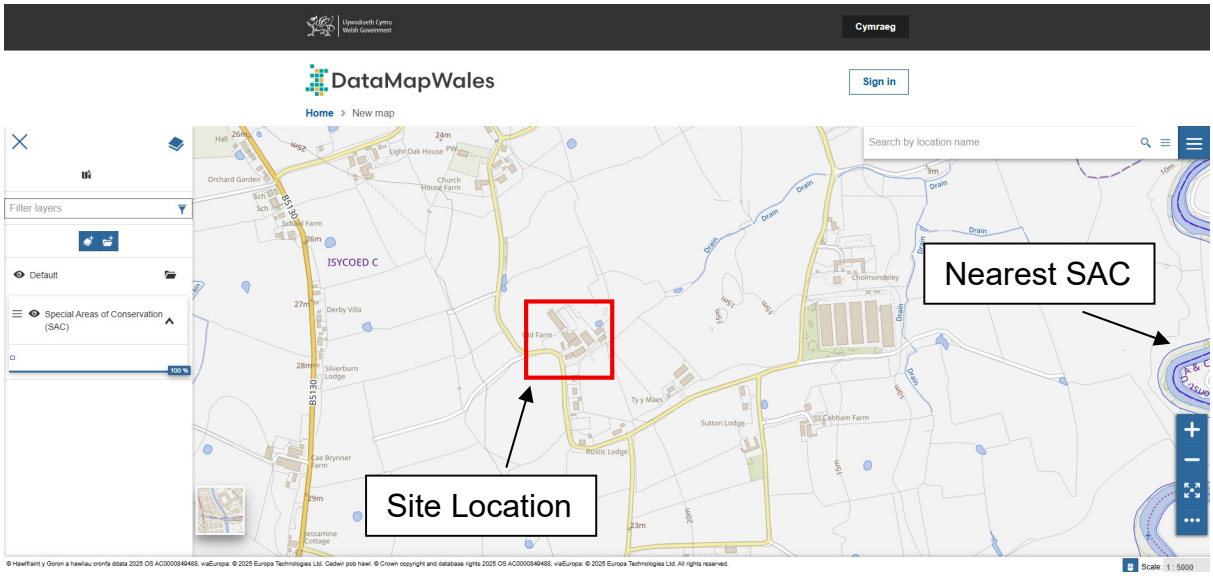


Figure 1 – Extract from DataMapWales showing site location and nearest SAC being the River Dee, approximately 1.35km to the east.

As there is sufficient porosity in the ground, we have been advised by the client that the existing dwelling's surface water discharges independently to a suitably sized soakaway within the paddock to the west of the site. Following the extension and remodelling of the property, additional testing will be carried out and the existing soakaway either extended or a new soakaway provided to account for the additional impermeable area.

We believe that the above extension will not undermine the ability for the SAC to meet its conservation objectives as there is no pathway for them to enter the SAC river environment. Within the guidance provided from NRW: 'Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive river Special Areas of Conservation', it explains that some development can be screened out to not have a significant effect on a river SAC as there is unlikely to be a source of additional nutrients or pathway for impacts such as:

- Any development that does not increase the volume and concentration of nutrients in wastewater;
- Private sewage treatment systems discharging domestic wastewater to ground, built to the relevant British Standard (BS 6297:2007+A1:2008), having a maximum daily discharge of less than 2 cubic metres (m3).

In addition, within the NRW guidance for domestic extensions, it states: *'Domestic extensions can provide increased living space within existing properties. This may not result in a change in the number of occupants and in our opinion, it would appear reasonable for domestic extensions to be screened out at the test of likely significant effect. Our view is that unless the proposal would result in the creation of independent living accommodation, a separate planning unit and/or a change in use, where it can no longer be said to be ancillary to the main residence, such developments are unlikely to lead to significant effects on a SAC through changes in discharge of wastewater'.* This proposal is for increased living space

within the existing property only and therefore is unlikely to lead to significant effects on a SAC.

As mentioned above, there will be no increase in the volume or concentration of nutrients in the wastewater as there will be no additional bedrooms added to the property.

We trust the above sets out the additional information requested for permitting such a drainage arrangement that will not cause any significant effect upon the integrity of the River Dee and Bala Lake Special Area of Conservation and you will now on balance be in a position to support the application.

Kind regards.

Yours sincerely,

K Griffiths

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