Ein cyf/Our ref: CAS-308967-Q5C2

Eich cyf/Your ref: P/2025/0241

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 15 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: ADDASU'R YSGUBOR YN ANNEDD / CONVERSION OF BARN TO DWELLING

Lleoliad/Location: WALLINGTON LANE FARM, WALLINGTON LANE, WORTHENBURY, WREXHAM, LL13 0AL

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) with additional information about the above, which we received on 18 May 2026.

We continue to 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, 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 new information submitted that the development has the potential to increase the amount of nutrients being discharged from the site.

We have reviewed the amended “Site Plan Proposed” drawing (reference A7, project number AD24-0128 dated 07/11/2025) and note that the private treatment plant is again shown to discharge to a nearby watercourse west of Wallington Lane. We also note that Section 14 of the amended Planning Statement (Charterhouse, dated November 2025) states that treated effluent from the sewage treatment plant will be conveyed via an underground pipe, across the adjacent field and discharged into a nearby watercourse.

Our previous response dated 11 November 2025 (ref: CAS-292800-D0M7) advised that in accordance with section 11 of our Advice, small discharges to ground (<2m^3/day) via a suitable drainage field built in accordance with criteria set out in our advice should be explored over direct discharges to watercourses as they are considered unlikely to have a pathway for nutrients to enter the river environment and are unlikely to have a significant effect on an SAC.

However, we note the confirmation from the local planning authority (LPA) which confirms that ground conditions are unsuitable for discharging treated effluent via drainage field. Therefore, we advise that based on the current information, this application does not meet the screening criteria as unlikely to have a significant effect on site integrity.

We advise that should the applicant wish to proceed with a direct discharge to watercourse an environmental permit to discharge would be required. Further details can be found on our website Apply for a permit to discharge domestic sewage.

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 on our website Natural Resources Wales - Pre application advice for environmental permits.

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.

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.

Protected Species

Our advice in relation to protected species remains unchanged since our previous letter dated 28 November 2025 (ref: CAS-292800-D0M7). For ease of reference, please see our comments below.

We have reviewed the following reports submitted and amended plans in support of the application:

- Davies, K., 19/07/2024, Preliminary Roost Assessment: Wallington Farm, Worthenbury, Wrexham, LL13 0AL, Issue 1.1, Arbtech Consulting Ltd
- Davies, K., 04/11/2024, Bat Emergence and Re-Entry Surveys: Wallington Farm, Worthenbury, Wrexham, LL13 0AL, Issue 1.0, Arbtech Consulting Ltd

We note that the Bat Emergence and Re-Entry Surveys report has identified that three species of bat are present at the application site: brown long-eared, Brandt's and common pipistrelle.

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 reports provide an adequate basis upon which to consider the potential impacts of the scheme on these species and inform the decision-making process.

Notwithstanding this, we also advise that further information is required to manage the potential impacts of the scheme in respect of timing, post development monitoring and lighting. We note that the Conclusions, Impacts and Recommendations table of the Bat Emergence and Re-Entry Surveys report includes outline details and states that further details would be provided with a European Protected Species (EPS) Licence application However, we advise that this further information should be submitted in relation to the proposed mitigation measures as part of this planning application. This information could be provided via a suitably worded condition, included on the decision notice.

We therefore advise the following condition in respect of bats is included on any permission granted:

Condition: No development shall commence until a Bat Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Bat Conservation Plan shall build upon the principles outlined in the submitted ecological reports (Preliminary Roost Assessment and Bat Emergence and Re-Entry Surveys) and include, but not necessarily be limited to:

- Submission of further details including plans of bat roost retention and creation measures for each of the species of bat recorded roosting at the application site.
- Details of timing, phasing and duration of construction activities and conservation measures.
- Timetable for implementation and demonstrating that works are aligned with the proposed phasing of the development.
- Measures to prevent incidental capture or killing of bats post development
- Actions to be taken in the event that previously unidentified species of bat are found
- Persons responsible for implementing the works.
- Post construction monitoring and record dissemination for a period of no less than 5 years.
- The submission of an external lighting scheme including plans. This scheme shall consider existing and proposed lighting together with any spillage originating from internal locations. This component requirement shall include:
    - Details of lighting to be used during and post construction
    - Plans illustrating the location and type of lighting
    - Plans illustrating projected or retained bat emergence points; together with retained or proposed features planned to be functionally used by bats for foraging/dispersal purposes.
    - The scheme shall accord with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals

The Bat Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that an approved species Conservation Plan is implemented, which protects species affected by the development

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.

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 about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Shaun Thomas

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: neplanning@cyfoethnaturiolcymru.gov.uk

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.