Cyfoeth Naturiol Cymru
Natural Resources Wales

Our Ref: CAS-309316-S0K5

Your Ref: P/2026/0118

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 16 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: CONVERSION OF OUTBUILDING TO DWELLING

Lleoliad/Location: SMELT FARM, MINERA ROAD, FFRITH, WREXHAM, LL11 5LS

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 21 April 2026.

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 **protected sites.** If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Sites

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 information submitted that the application proposes the conversion of an outbuilding to a three-bedroom dwelling, with foul sewage to be disposed of to a package treatment plant (PTP). The application form indicates that whether this is a new or existing PTP is unknown.

As such, we refer you to our Advice and advise you to seek further information from the applicant. We advise you to seek clarification as to whether connection to a new or existing sewage treatment is proposed, and further information as identified in the section

titled “What does this mean for development proposals involving private sewage treatment systems” or “Can additional wastewater be discharged to existing private sewage treatment systems?” of that Advice as necessary.

For a new PTP connection, we advise you seek information from the applicant which confirms:

- how the foul effluent will be discharged, for example via soakaway to ground or to watercourse
- the location of the discharge, for example a plan showing the location of the proposed private sewerage system and the soakaway or discharge point to watercourse
- disposal of foul effluent would be effective at this location, for example if discharge is proposed to ground you should submit porosity/percolation testing results and calculations for the specific size of any proposed soakaway(s) and ensure there is sufficient space to install the drainage field as set out in British Standard 6297:2007+A1:2008)

Should connection to an existing PTP be proposed, we advise that confirmation provided by the applicant to confirm that the existing system has capacity for additional flows from the proposed dwelling.

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.

European protected species: bats

We note that the information submitted in support of the above application (Ecological Impact Assessment at Smelt Farm by Susan Worsfold dated 2 January 2026, reference SA1125) has identified that bats are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.

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.

Advice for the 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. Small sewerage systems that meet certain criteria may be registered as exempt.

If a private sewerage system is not eligible for an exemption, you will need to apply to us for an environmental permit. Further details can be found here. Further information may be needed as part of the permit application process. You are therefore advised to contact us for pre-application advice at the earliest opportunity to try to ensure 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 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. You are encouraged to ensure you 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 you to Guidance for Pollution Prevention 4 on the NetRegs website, which provides further information.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Heather McDowell

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.