Ein cyf/Our ref: CAS-312050-F2Q9

Eich cyf/Your ref: P/2025/0951

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 10 July 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Conversion of barn/outbuilding to self-contained holiday let

Lleoliad/Location: Greenways, Tarts Hill, Hanmer, Whitchurch, SY13 3DR

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 24 June 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.

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 information submitted that a new package treatment plant (PTP) is to be installed to provide foul drainage for the conversion of the building to a single holiday let. 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 seek further information from the applicant. We note that information has already been submitted in respect of how foul

drainage will be managed including the results of infiltration testing for the site and the size of the proposed drainage field.

However, given the findings of the percolation testing, we advise you to seek further information as identified in the section titled 'What does this mean for development proposals involving private sewage treatment" of that Advice.

The results indicate a high percolation value (Vp), with an average of 96 seconds per millimetre. Whilst a Vp value between 15 and 100 is generally considered acceptable for a drainage field, the recorded value is at the upper end of this range. Furthermore, the testing appears to have been undertaken during dry weather conditions, which may not provide a reliable indication of the site's performance throughout the year.

Therefore, to ensure that the proposed drainage field is suitable and capable of operating effectively in all weather conditions, we advise that the applicant submits further evidence through the submission of an environmental method statement to demonstrate the suitability of the ground conditions.

This should be accompanied by a scaled plan showing the proposed location of the package treatment plant (PTP) and associated drainage field. Such information is necessary to demonstrate that the proposed foul drainage system can operate satisfactorily without posing a risk to groundwater or the wider environment.

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

We note that the information submitted in support of the above application (Bats and Nesting Birds Assessment for Greenways Farm, Whitchurch by PJ Ecological Solutions dated June 2026) 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 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.

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

Yn gywir / Yours faithfully,

Sara Thomas

Uwch Gynghorydd - Cynllunio Datblygu/Senior 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.