Ein cyf/Our ref: CAS-316044-N2X9

Eich cyf/Your ref: P/2025/0951

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 27 August 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) with additional information about the above, which we received on 08 August 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 understand that the application has been amended to include the use of a Cinderella incinerator toilet and reed bed 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. Limited information has been provided regarding the management and disposal

of waste generated by the incinerator toilet. Further details would be required to enable a full assessment of the potential environmental impacts of the proposal.

We note that the applicant also proposes a reed bed system for the treatment of grey water, with discharge to a shallow infiltration trench. Whilst some information has been provided regarding the size of the reed bed and the proposed discharge arrangement, the location of both the reed bed and infiltration trench has not been provided. This information is necessary to allow a full assessment of the suitability of the proposed drainage arrangements and any potential impacts on the SAC and wider environment.

In addition, the submitted information does not clarify whether any pre-treatment of grey water is proposed prior to discharge to the reed bed. We would therefore require further details of the treatment process, including any associated infrastructure, to demonstrate that the system can operate effectively and without unacceptable environmental risk.

We also advise that the Environmental Method Statement is updated to reflect the amended foul drainage proposals. The submitted maintenance information should be expanded to include details of the ongoing maintenance requirements for all components of the drainage system, together with arrangements for the management and disposal of waste arising from the incinerator toilet.

Given the environmentally sensitive location of the site, the applicant should also be aware that an environmental permit may be required. Information on environmental permitting requirements can be found on the Natural Resources Wales website: Apply for a permit to discharge domestic sewage.

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.