Ein cyf/Our ref: CAS-315700-D1J1
Eich cyf/Your ref: P/2026/0329

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 28 August 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Conversion of building to holiday accommodation

Lleoliad/Location: Drefechan Farm, Drefechan, Pen-y-Cae, Wrexham, LL14 1UE.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 05 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 note from the information submitted that foul drainage for the proposed holiday let is to be managed via a private treatment plant (PTP) and 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 seek further information from the applicant. Whilst percolation test results have been submitted, we advise that your Authority requests additional information as identified in the section titled "What does this

mean for development proposals involving private sewage treatment systems?" of our advice.

In particular, we advise that the following information is obtained:

- Confirmation as to whether the PTP is a new installation and whether it will serve more than one dwelling.
- A scaled site plan showing the location of the proposed PTP, discharge point and any drainage field.
- The dates of the percolation testing and confirmation that the results are representative of site conditions across a range of weather and ground conditions, noting that current exceptionally dry conditions may affect the reliability of the recorded infiltration rates.
- Calculations demonstrating that the drainage field size and design are appropriate for the proposed discharge volume and comply with the relevant British Standard.

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. Septic tanks and small sewage treatment works that meet certain criteria may be registered as exempt.

A step by step guide to registering an exemption can be found on our website.

If the septic tank or private sewage treatment system is not eligible for an exemption, the Applicant will need to apply for an environmental permit, further details can be found here. 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 here.

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.

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 the Applicant to Guidance for Pollution Prevention 4 on the NetRegs website, which provides further information.

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

No ecological information has been submitted in support of this application. We recommend you seek the advice of your Authority's internal ecological adviser about the requirement for further information to be submitted in support of the application, the need for bespoke surveys and the scope of further information, where required.

Designated Landscape

The development is situated within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) / National Landscape. We note that there is no information regarding landscape assessments with the application and therefore, we are assuming that your Authority has screened the application and concluded that any impacts on landscape are unlikely and the proposal is in line with Planning Policy Wales. If you require further advice, then please reconsult us.

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.