

Ein cyf/Our ref: CAS-317915-S9P8
Eich cyf/Your ref: P/2023/0598

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 18 September 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Newid defnydd adeilad o ddefnydd amaethyddol i ddefnydd masnachol ar holl waith cysylltiedig / Change of use of building from agriculture to commercial use and all associated works

Lleoliad/Location: Isycoed Farm, Holt Road, Ridleywood, Wrexham, LL13 9US

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 01 September 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 and Foul Drainage

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 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 package treatment plant with a discharge to drainage field is to be installed to provide foul drainage for the proposed development. Within the additional information submitted, the email to your Authority dated 25 August 2026 states that

“the proposed development can be screened out as not likely to have a significant effect on the River Dee & Bala Lake SAC in relation to nutrient inputs...”

However, we advise that there is insufficient information to demonstrate that the application can be screened out in relation to impacts from nutrients and advise you to seek further information as identified in the section titled What does this mean for development proposals involving private sewage treatment systems of our published [Advice](#).

The email dated 25 August 2026 states, in relation to ‘known discharges’:

“The attached screenshot shows a distance of 50m (red circle) from the proposed location of the new drainage field – as you will note, there are no other known discharges to ground within this 50m distance”

We have reviewed our records for this area and advise that there is no permit or exemption recorded for the existing residential dwelling or any welfare provisions (if present) at the existing farm. No information has been submitted to identify the location of an existing PTP or septic tank or discharge serving the residential property therefore it cannot be screened out in relation to ‘known discharges’. Further information to confirm the location of existing foul drainage provisions relating to the residential dwelling (and if present any welfare facilities on the farmyard) should be submitted.

We understand from the submitted Justification Statement (Roger Parry & Partners LLP, August 2023) that the applicant is intending to ‘come out of dairy farming’ and Section 2.4 of the Statement cites a betterment due to the applicant ‘proposing to take 130 dairy cows and 70 youngstock/ beef out of production’. The HRA submitted in support of the application states there to be a ‘reduction in wastewater due to dairy farming stopping in the sheds that are proposed for change of use’.

It is not clear if the reduction in the size of the scheme since our earlier consultation response dated 12/09/24 (reference CAS-263687-K4X5) will affect the number of livestock (quoted above) to be taken out of production. We advise that your authority should seek clarification on the existing stock levels and the resultant stock levels associated with the proposed development to inform your decision.

In addition to the above, we also advise that the following information should be provided in support of the application:

- Results of infiltration testing with calculations to demonstrate that the drainage field size and design is appropriate for the volume of discharge proposed and follows the relevant British Standard.
- Details regarding how waste generated from the proposed uses (mechanics, vehicle sprayers, carpenters, workshop engineers etc) will be managed and any safeguards to ensure that only domestic wastewater (toilets, handwashing and welfare facilities) is discharging to the proposed PTP
- Details regarding measures to prevent vehicles movement or parking over the drainage field

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

The bat report submitted in support of the application (Stirling, P., August 2023, Preliminary Ecological Appraisal, Arbor Vitae Environment Ltd) has identified under Section 5.2 that building 2b has low suitability and at least 1 bat activity survey should be carried out.

However, we note that the amended plans as per the Proposed Block Plan (reference 77362 / RJC / 003, Revision D and dated 14/06/2024) show that buildings F & G are omitted from the application. Building F on the Proposed Block Plan corresponds with building 2b as referenced within the ecology report. Our understanding is that no works are to be carried out to building 2b therefore, we do not consider that a bat activity survey is needed in relation to building 2b.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017

We consider that the above report provides an adequate basis upon which to assess the potential impacts of the scheme on this species and inform the decision-making process.

We advise that you consult your internal ecological advisor on these proposals to ensure that suitable information is provided that assesses the extent of adverse effects on the bats and any avoidance or mitigation measures required. This must demonstrate that the proposed development would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

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,

Rachael Burke

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.