Ein cyf/Our ref: CAS-279397-D4T0
Eich cyf/Your ref: P/2025/0346

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 07 May 2025

Dear Sir/Madam,

PROPOSAL: CHANGE OF USE FROM D1 SCHOOL TO MULTI-USE SITE INCLUDING A1, A3, B1, D1 AND D2 USES

LOCATION: PONTFADOG COUNTY PRIMARY SCHOOL, PONTFADOG, LLANGOLLEN, LL20 7AH

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 23 April 2025.

We have concerns with the application as submitted. To overcome these concerns, further consideration is required regarding foul drainage. Further details are provided below.

Protected Sites

River Dee and Bala Lake Special Area of Conservation (SAC)

- Nutrient Sensitive SAC Catchment – Foul Drainage

Your Authority confirmed by email on 29 April 2025 that the proposed development could potentially lead to an increase of phosphorus load from the receiving wastewater treatment works into the River Dee and Bala Lake SAC. The majority of the River Dee catchment in Wales is currently failing to meet water quality targets for phosphorus. The nutrient impacts of new connections need to be considered on a case-by-case basis within the Habitats Regulations Assessment process. Whilst NRW permitting service has completed a Review of Water Company Discharge Permits we are currently undertaking further data analysis for the River Dee following a number of enquiries and questions from stakeholders and several ongoing Appeals. We will be able to provide further advice to your Authority once we have concluded the review.

- Pollution Prevention

The application is located within 65m of the River Dee and Bala Lake SAC.

From the information provided, we consider that the proposal may affect the SAC and have identified pollution as a potential impact pathway to features of the site.

However, we consider the above pathway would not result in an adverse effect if the developer adheres to standard pollution prevention guidelines.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for your Authority to carry out the test of Likely Significant Effects for the proposed development. Should you conclude that the proposal is likely to have a significant effect on a SAC, either alone or in combination with other plans or projects, an appropriate assessment must be made of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify.

River Dee Site of Special Scientific Interest (SSSI)

NRW consider the proposals have the potential to impact upon the River Dee SSSI. Providing the impact pathways referenced above for the SAC are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded.

Flood Risk

The planning application proposes less vulnerable mixed use development. The Flood Map for Planning identifies the application site to be at risk of flooding and lies partially within Flood Zone 2 (Rivers) and slightly (south-east corner) within Flood Zone 3 (Rivers).

The application proposes a change of use / conversion to a less vulnerable development as defined in Technical Advice Note 15: Development, flooding and coastal erosion (TAN15), dated 2025. As such, we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and consequences. We would also expect the developer to take the opportunity to incorporate flood resilient design where feasible.

Guidance on resilient design can be found in Chapter 13 of TAN15 which references advice from Construction Industry Research and Information Association, including a Code of Practice and Guidance for Property Flood Resilience.

We provide advice on our website Natural Resources Wales / Preparing for a flood which may be useful for the developer or occupant of the proposal.

Protected Species

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

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is

published on our website. We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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 on the above, please do not hesitate to contact us.

Yours faithfully,

Tristan Williams
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.