Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-280502-H6S3
Eich cyf/Your ref: P/2025/0380

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 21 May 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: DISCHARGE OF CONDITIONS 3 (LIGHTING), 4 (SAMPLES), 5 (DRAINAGE), 6 (CONTAMINATION), 7 (VALIDATION REPORT), 8 (BIODIVERSITY), 9 (BOUNDARY TREATMENT), 10 (CONSTRUCTION TRAFFIC MANAGEMENT) AND 11 (SERVICE DELIVERY MANAGEMENT PLAN) OF PLANNING PERMISSION P/2022/0181

LLEOLIAD/LOCATION: 124 RHOSNESNI LANE, WREXHAM, LL12 7NB

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 09 May 2025.

We have concerns with the application as submitted. We do not recommend your Authority discharges Conditions 6 and 7 for the below reasons. In addition, we advise that further consideration is required regarding condition 5.

We have no comment on Conditions 3, 4, 8, 9, 10 and 11.

Conditions 6 (Contamination) and 7 (Validation Report)

We have reviewed the documents related to contaminated land, groundwater, and coal mining published on the local authority's website. We concur with the recommendations in Section 8 of the *Phase 1 Contaminated Land Assessment*, dated August 2024 (Smith Grant LLP, Ref. £3341-R01-V1).

However, only part of Conditions 6 and 7 has so far been addressed (preliminary risk assessment). Based on the submitted information, the remaining details required by these conditions are yet to be provided, including the results of the site investigations recommended in the Phase 1 Site Investigation Report. Therefore, we do not recommend that your Authority fully discharges Conditions 6 and 7 until the remaining information is submitted.

Condition 5 (Drainage)

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 Special Area of Conservation. 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.

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.

Yn gywir / Yours faithfully

Garmon Lewis
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.