

Ein cyf/Our ref: CAS-276498-S4H8  
Eich cyf/Your ref: P/2022/1021

Wrexham County Borough Council  
The Guildhall  
Wrexham  
LL11 1AY

Date: 20 March 2025

Dear Sir/Madam,

**PROPOSAL: Subdivision of dwelling into 2 dwellings**

**LOCATION: The Barn, Higher Berse, Higher Berse Road, Southsea, LL11 6PW**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) with additional information about the above, which we received on 12 March 2025.

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

**Foul Drainage and Protected Sites**

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 \(28 June 2024\)](#), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

We have reviewed the submitted 'Appropriate Assessment for Nutrients' ['Shadow AA'], dated 10 March 2025, by H Fraser Consulting. This states that "*The existing package treatment plant discharges to...watercourse*". The proposals also involve discharging sewage effluent to surface water, not to ground. However, Section 3.1 of the Shadow AA on "Site Occupancy" refers to a: "*reduction on the nine current occupants prior to the development, and would therefore represent a reduction in nutrient output*". Section 3.2 also refers to "*Improved Specification of the PTP*".

Providing your Authority is in agreement with the position outlined in respect of site occupancy, you may deem the following points from the section titled '*What development proposals are unlikely to increase nutrient levels within a river SAC?*' from our [Advice](#) to be applicable:

*The following developments can be screened out as not likely to have a significant effect on a river SAC in relation to nutrient inputs, as there is unlikely to be a source of additional nutrients or pathway for impacts:*

- *any development that does not increase the volume and concentration of nutrients in wastewater*
- *any development that improves existing water quality discharges by reducing the nutrient concentration of wastewater without increasing volume or by decreasing the volume of wastewater produced without increasing the concentration of nutrients*

Should you be in agreement with the above, we would not require any further consultation.

We advise the Applicant make use of our [pre-application advice service prior to applying for an Environmental Permit](#), to try to ensure that there is no conflict between any planning permission granted and the permit requirements. It is important to note that a grant of planning permission does not guarantee that a permit will be granted, should a proposal be deemed to be unacceptable (either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible). The Applicant should ensure that they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site.

More information, including a step by step guide to registering and the relevant application forms are available on our [website](#). 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.

### **Protected Species**

We note that there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

### **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.