Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-281630-H8R6
Eich cyf/Your ref: P/2025/0417

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 17 June 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: OUTLINE APPLICATION FOR ERECTION OF UP TO 39 DWELLINGS (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE RESERVED)

LLEOLIAD/LOCATION: LAND ADJACENT TO SYCAMORE HOUSE, WREXHAM ROAD A534, HOLT, WREXHAM, LL13 9YU

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 28 May 2025.

We have concerns with the application as submitted. We advise that further consideration is required regarding foul drainage. Further details are provided below.

We also advise that based on the information submitted to date, a condition regarding contaminated land should be attached to any planning permission granted.

Condition: Contaminated Land

Please note, without the inclusion of this condition we would object to this planning application.

Protected Sites

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

We note the submission of a Nutrient Neutrality Assessment and Mitigation Strategy (reference GSL12/Pridding, dated 03/09/2024, Greenshank Environmental).

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.

Contaminated Land

We have reviewed the following documents submitted in support of this application:

- Phase I Geoenvironmental Site Assessment, Reference 14-608-R1 dated February 2021, E3P
- Phase II Geoenvironmental Site Assessment, Reference 14-608-R2-1 dated April 2021, E3P

A small area of shallow (0.1m) soil (at TP116) was found to contain evidence of diesel oil, poly-aromatic hydrocarbons (PAH), and faecal coli (from manure). However, the past use of the site and submitted information indicates a very low risk to controlled waters. Although we would not recommend attaching the full suite of contaminated land conditions for this development, we agree with the consultant's recommendations for dealing with the contaminated soil found at TP116 and the watching brief for other potential contamination during subsequent ground works. Therefore, we advise that the following condition regarding unsuspected contamination should be attached to any planning permission for this development.

Condition: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

Protected Species

We note that the information submitted in support of the above application (Ecology Scoping Assessment Doc Ref: E24/1106/01 dated 27/06/24, Kingdom Ecology Ltd) has identified that protected species are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of protected species.

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

Yn gywir / Yours faithfully,

Rachael Burke
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
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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.