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LL572DW

Wrexham County Borough Council,  
The Guildhall,  
Wrexham,  
LL11 1AY

ebost/email:  
northplanning@cyfoethnaturiolcymru.gov.uk

04/10/2022

Annwyl Syr/Madam / Dear Sir/Madam,

**BWRIAD / PROPOSAL: DYMCHWEL ADEILAD PRESENNOL A CHODI 5 ANNEDD /  
DEMOLITION OF EXISTING BUILDING AND ERECTION OF 5 DWELLINGS**

**LLEOLIAD / LOCATION: TERFYNFA, SMELT ROAD, COEDPOETH, WREXHAM, LL11  
3SH**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 14/09/2022.

**We 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 – Foul Drainage**

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21<sup>st</sup> January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (July 2022), under the Habitats Regulations, Planning Authorities must consider the phosphorus 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 the development has the potential to increase the amount of phosphorus being discharged from the site. As such, we refer you to our Planning Advice and advise you to seek further information from the applicant. We note that information has already been submitted confirming that Five Fords Wastewater Treatment Works (WwTW) has a phosphate permit. However, we advise you to seek further information as identified in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works' of that advice.

Provided this advice is followed and you are able to conclude that the development is not likely to have a significant effect on the SAC, we would have no objection to the proposal. However, should you conclude that the proposed development is likely to have a significant effect on the SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

## **Ecology**

We note that the bat report submitted in support of the above application (Arbtech, June 2022; Preliminary Ecological Appraisal and Preliminary Roost Assessment) has identified that bats were not using the application site. We therefore have no comments to make on the application as submitted.

We advise liaison with the LPA ecologist to discuss and agree the scope of any further surveys, if 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.

Yn gywir / Yours faithfully,

**Garmon Lewis**

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning  
Cyfoeth Naturiol Cymru / Natural Resources Wales