

Ein cyf/Our Ref: CAS-237869-X0N2  
Eich cyf/Your Ref: P/2023/0591

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

Dyddiad/Date: 12 October 2023

Annwyl Syr/Madam / Dear Sir/Madam,

**BWRIAD/PROPOSAL: AMRYWIO AMODAU 1,3,9 A 10 CANIATAD CYNLLUNIO P/2020/0391 I YMESTYN TERFYN DIWYGIO DEUNYDDIAU, CYNLLUN RHEOLI TIRLUN, DIWYGIO DRAENIO / VARIATION OF CONDITIONS 1,3,9 AND 10 OF PLANNING PERMISSION P/2020/0391 TO EXTEND TIME, AMEND MATERIALS, LANDSCAPE MANAGEMENT PLAN, AMEND DRAINAGE**

**LLEOLIAD/LOCATION: LAND AT TURKEY PAPER MILL BERSHAM ROAD BERSHAM WREXHAM**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) about the above, which we received on 25/09/2023.

**We have concerns with the application as submitted. We do not recommend your Authority varies condition 1 or discharges condition 10 because inadequate information has been provided in support of the proposal. To overcome these concerns, further consideration is required regarding foul drainage. Further details are provided below.**

**We have no comments concerning the discharge of conditions 3 and 9.**

### **Protected Sites and 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](#) (August 2023), 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 understand this application for variation of conditions 1, 3, 9 and 10 of planning permission P/2020/0391 proposes connection of foul water to the mains sewer. However, no information has been provided to confirm whether Dŵr Cymru/Welsh Water (DCWW) can accept the foul flows from the proposed development. We refer you to our Planning Advice and the

information set out in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works'.

Your Authority will need to take the above into account in your determination of whether the development is likely to have a significant effect on the SAC. Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity. You should then consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine.

### **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

**Pauline Gallagher Brown**

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Ffôn/Tel: 0300 065 4086

E-bost/E-mail: [northplanning@cyfoethnaturiolcymru.gov.uk](mailto:northplanning@cyfoethnaturiolcymru.gov.uk)

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.