



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-202089-X8X4
Eich cyf/Your ref: P/2022/0766

Maes Y Ffynnon,
Penrhosgarnedd,
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Wrexham County Borough Council,
The Guildhall,
Wrexham,
LL11 1AY

ebost/email:
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03/11/2022

Dear Sarah Hill,

BWRIAD / PROPOSAL: Dymchwel annedd bresennol a chodi annedd newydd /
Demolition of existing dwelling and erection of replacement
dwelling

LLEOLIAD / LOCATION: Chapel Farm, Newbridge Road, Newbridge, Wrexham, LL14
3JA

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above with additional information which we received on 25.10.2022.

We continue to have concerns with the application as submitted 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.

Protected Sites

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 21st 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.

Additional details have been submitted for this application for the erection of a replacement dwelling showing a proposed connection of foul water to the mains sewer. In addition, Dwr Cymru /Welsh Water have confirmed that capacity exists within the public sewerage network to receive the domestic foul only flows. They have also advised that Cefn WwTW has a phosphate permit. The information set out in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works' has been submitted with the application.

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.

We also note that information has been provided to support the use of a private treatment plant as this would provide improved facilities compared to the existing septic tank. However, as noted in more detail in our previous response dated 05.10.2022 the installation of private sewage treatment facilities within publicly sewered areas is not normally considered environmentally acceptable because of the greater risk of failures leading to pollution of the water environment compared to public sewerage systems.

Protected Species

We note that the bat report submitted in support of the above application (Kingdom Ecology, 5th August 2022) has identified that bats are not roosting at the application site but are using the site for commuting and foraging. From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document '*Natural Resources Wales Approach to Bats and Planning* (2015)'. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

As this is a lower risk case for bats, we consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Furthermore, we advise that the proposed development is not likely to harm or disturb the bats or their breeding sites and resting places at this site. However, we recommend the measures described in section 4.1.1 the bat report are implemented.

Protected Landscape

The development site lies just outside of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) where the primary objective is the conservation and enhancement of natural beauty.

We consider the proposal will not affect the purpose of the AONB, however there could be local issues. We therefore advise that discussions are held with the local authority's landscape specialist.

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

Sara Thomas

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