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26/01/2023

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: ADEILADU 4 ANNEDD (2 DY A 2 FFLAT) / ERECTION OF 4 DWELLINGS (2 HOUSES AND 2 FLATS)

LLEOLIAD / LOCATION: LAND ADJACENT TO BRITISH LEGION, Ffordd Kayton, Cefn Mawr, Wrexham, LL14 3PE

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 10.01.2023.

We 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 – 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 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.

We note that this application for the erection of four dwellings proposes connection of foul water to the mains sewer. We advise that you also seek scale plans showing the location of the nearest public sewer and proposed connection point, as set out in the section of our Planning Advice 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.

Protected Species

We note that the bat report submitted in support of the above application (Preliminary Ecological Appraisal for Land at British Legion Ffordd Kayton, Cefn Mawr by Arbtech, dated 20.06.2022) has identified that bats are unlikely to be using the application site. We therefore have no comments to make on the application as submitted and advise that you liaise with your own Authority's ecologist.

Flood Risk

The planning application proposes highly vulnerable development involving the construction of four residential units. The application site falls partly within Zone C2 of the Development Advice Map (DAM) contained in TAN15 (2004). However, at this location the Flood Map for Planning (FMfP) is the best available information on flood risk. The FMfP identifies the application site to be in Flood Zone 1, meaning there is less than a 0.1% chance of flooding in a given year.

On this basis, we have no objection to the application as submitted on flood risk grounds.

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