

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

09/12/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: ERECTION OF DWELLING

LLEOLIAD / LOCATION: 3 - 4, WILLOW COTTAGES, GLANLLYN ROAD, BRADLEY, LL11 4AY

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 23/11/2022.

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.

We also advise that based on the information submitted to date, the documents identified below should be included in the approved plans and documents condition on the decision notice. Without the inclusion of these documents we would object to this planning application:

- Report titled '*Proposed development land to rear of Willow Cottages Glan-Llyn Road Bradley Wrexham LL11 4AY (Great Crested Newt Reasonable Avoidance Methods)*' by Stephen Cutmore Arboricultural & Ecological Services
- Report titled '*Proposed Development Land to Rear of Willow Cottages Glan-Llyn Road Bradley Wrexham LL11 4AY (Bat Reasonable Avoidance Methods)*' by Stephen Cutmore Arboricultural & Ecological Services

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 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 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 in respect of the means of disposal of foul sewage. 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.

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).

Protected Species

We note that the ecological reports submitted in support of the above application (Preliminary Ecological Appraisal Report by Stephen Cutmore, dated 28 July 2022, and Bat Emergence Survey by Stephen Cutmore, dated 29 July 2022) have identified that bats have the potential to use the site for foraging/commuting. The PEA report also concludes that the site offers low potential for foraging/commuting great crested newts.

We note that the following reasonable avoidance measures for bats and great crested newts have been submitted in support of the application:

- Report titled '*Proposed development land to rear of Willow Cottages Glan-Llyn Road Bradley Wrexham LL11 4AY (Great Crested Newt Reasonable Avoidance Methods)*' by Stephen Cutmore Arboricultural & Ecological Services
- Report titled '*Proposed Development Land to Rear of Willow Cottages Glan-Llyn Road Bradley Wrexham LL11 4AY (Bat Reasonable Avoidance Methods)*' by Stephen Cutmore Arboricultural & Ecological Services

We advise that the proposed development is not likely to harm or disturb bats or great crested newts, provided the reasonable avoidance measures described in the reports above are implemented.

The reports must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted. Without the inclusion of these documents we would object to this planning application.

Please consult us again if any further information shows that this is no longer a lower risk case.

Lead Local Flood Authority

Wrexham County Borough Council drainage department in their capacity as lead local flood authority may be able to advise on any local problems in relation to surface water disposal and any associated flood risk.

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
Cyfoeth Naturiol Cymru / Natural Resources Wales