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Wrexham County Borough Council,
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25/07/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CONVERSION OF BUILDING TO 3 DWELLINGS

LLEOLIAD / LOCATION: BARTON HOUSE, DARLAND LANE, ROSSETT, WREXHAM, LL12 0EL

Thank you for re-consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 05/07/2022.

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, 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 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. As part of this package, we issued a [Planning Position Statement](#), in which we advised that any proposed development that might increase the amount of phosphate (or phosphorus) within a river SAC catchment could lead to damaging effects to the SAC. Therefore, such proposals should be screened through a Habitats Regulations Assessment (HRA), to determine whether they are likely to have a significant effect on the SAC. We have also issued [Planning Advice](#) (May 2021) which gives specific advice in respect of foul drainage arrangements for new developments.

We've received calculations from the agent in relation to foul drainage loads from the proposed development, in comparison with existing / historic loads. The calculations conclude that this development will result in a decrease in foul water discharge from this site, and therefore a reduction in the amount phosphorus discharged from the site.

However, we've reviewed the calculations, and dispute the conclusions. Flows and Loads 4 advises the following;

- House with 3 bedrooms – minimum of 5P
- House with 2 bedrooms – minimum of 4P

Therefore, 2 x 3bed house, and 1 x 2bed house should equate to 14P. However, as stated in the Flows and Loads 4 guidance, since the total is between 13-25, and adjusted P value can be used, therefore $14 \times 0.9 = 12.6$ (rounded up to 13 P). Based on this calculation, the proposed flows would be (13 x 150 litres per day) 1950 litres, therefore an increase to the existing rate of 1300 litres a day.

Therefore, we are still of the opinion 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 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).

Protected Species

We note that the bat report submitted in support of the above application (Leigh Ecology Limited, August 2021. Ref ILEX/21/01) has identified that bats were not using the application site. We therefore have no comments to make on the application as submitted.

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

Garmon Lewis

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