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LL572DW

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

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Ffôn/Phone: 03000 65 3786

24/11/2022

Dear Amy Brittain,

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

LLEOLIAD / LOCATION: 9 Sherbourne Avenue, Bradley, Wrexham, LL11 4AZ

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 7th November 2022.

We have no objection to the proposed development as submitted and provide the following advice.

Protected Species

Great Crested Newts

We note that the Great Crested Newt report submitted in support of the above application (Reasonable Avoidance Method Statement for Great Crested Newts, Enfys Ecology, 21/10/2022) has identified that the proposed development represents a lower risk for Great Crested Newts (GCN). Great Crested Newts 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 GCN, 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 Great Crested Newts or their breeding sites and resting places at this site, provided the avoidance measures described in the Reasonable Avoidance Method Statement for Great Crested Newts, Enfys Ecology, 21/10/2022 report are implemented.

The report must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Bats

We note that the bat report submitted in support of the above application (Bat and Nesting Bird Surveys, Enfys Ecology, 17/10/2022) has identified that bats were not using the application site. We therefore have no further comments to make on bats with regard to the application as submitted.

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.

However, recognising the specific nature of the application submitted, i.e. a replacement dwelling to an existing dwelling, we are satisfied that it is unlikely to increase the amount of phosphorus entering the catchment. Therefore, we are satisfied that the proposal is not likely to have a significant effect on the River Dee and Bala Lake SAC.

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.

Yours faithfully

Gareth Thomas

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