

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

20/01/2022

Dear Sir/Madam,

BWRIAD / PROPOSAL: DYMCHWEL ANNEDD BRESENNOL A CHODI ANNEDD NEWYDD (NEWIDIAD I GANITAD CYNLLUNIO P/2020/0451) / DEMOLITION OF EXISTING DWELLING AND ERECTION OF REPLACEMENT DWELLING (AMENDMENT TO PLANNING PERMISSION P/2020/0451)

LLEOLIAD / LOCATION: ALTHREY WOODHOUSE, BANGOR ON DEE, WREXHAM, LL13 0DA

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

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the documents identified below are included in the approved plans and documents condition on the decision notice:

- Preliminary Ecological Appraisal, Arbor Vitae (Undated)
- Prestwood, W. (Feb 2020), GCN RAMs Method Statement, Arbor Vitae
- Biosecurity Risk Assessment, Moss & Co, (January 2022), Ref. 1239

Please note, without the inclusion of these documents we would object to this planning application. Further details are provided below.

Protected Species

We note that the bat report submitted in support of the above application (Preliminary Ecological Appraisal, Arbor Vitae (Undated)) has identified that bats are not present at the application site.

Furthermore, we advise that the proposed development is not likely to harm or disturb bats or Great Crested Newts (*Triturus cristatus*) or their breeding sites and resting places at this

site, provided the avoidance measures described in the Preliminary Ecological Appraisal, Arbor Vitae (Undated) and the GCN RAMs Method Statement (Prestwood, W. Feb 2020, Arbor Vitae) 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.

Biosecurity

We note the contents of the 'Biosecurity Risk Assessment, Moss & Co (January 2022), Ref 1239' report and concur with the findings and proposed control measures.

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

Protected Sites

Special Area of Conservation (SAC)

From the information provided, NRW consider that the proposals may affect the River Dee and Bala Lake SAC. The application is located within 398m of the River Dee and Bala Lake SAC.

NRW have identified the following potential impact pathway to features of this site:

1. Water pollution

The above pathways may not result in an adverse effect if the following measures are adhered to/implemented:

1. Developer adheres to pollution prevention guidelines

No assessment of likely significant effect under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) has been undertaken by your authority or it has not been forwarded to NRW for consideration. Should you conclude that the proposed development is likely to have a significant effect on the European site, we look forward to being re-consulted. In the absence of this assessment, NRW cannot offer assurances that the proposals would not result in an adverse effect upon the SAC.

Site of Special Scientific Interest (SSSI)

NRW consider the proposals have the potential to impact upon the River Dee SSSI. Providing the impact pathways referenced above for the SAC are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded.

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.

However, recognising that the proposal is for alterations and an extension 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.

Yn gywir / Yours faithfully,

Rachael Burke

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