

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

22/03/2022

Dear Sir/Madam,

PROPOSAL: ERECTION OF TWO STOREY DETACHED DWELLING

LOCATION: LAND ADJACENT TO BRONYDD HIGH STREET, GLYN CEIRIOG, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 09/03/2022.

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 document identified below should be included in the approved plans and documents condition on the decision notice. Without the inclusion of this document, we would object to this planning application.

Approved document: Bronydd Glyn Ceiriog Preliminary Ecological Appraisal report; Stephen Cutmore; 2 June 2021

Foul Drainage and Protected Sites

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 note from the information submitted that the development has the potential to increase the amount of phosphorus being discharged from the site. We also note the following from the Planning Supporting Statement, dated 04/03/2022:

"The intention is to connect to adopted Welsh Water foul water sewer system in High Street. A GRAF One2clean+P foul water treatment tank will be installed within the site. After treatment the final discharge will still be to the Welsh Water public sewer in High Street and thereby to the Glyn Ceiriog Wastewater Treatment [WwTW] Works."

As such, we refer you to our [Planning Advice](#), in particular the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works', which specifies the information that should be provided to support applications which propose connections to public wastewater treatment works.

With regards to the third bullet point of the above advice, we note from the information available on your Authority's website that Welsh Water in their consultation response dated 14/03/2022 (their ref: PLA0064164) have confirmed that "Glynceiriog WwTW does not have a phosphate permit".

In this instance, we advise your Authority to seek confirmation from Welsh Water on whether they are satisfied with the proposal outlined in the Planning Supporting Statement dated 04/03/2022 (quoted above). Their advice should also be sought on what impact the chemical dosing would have on their final effluent discharge / permit compliance.

Only after confirmation that Welsh Water are satisfied with the proposal should your Authority consider the mitigation measures proposed.

The applicant should provide your Authority with details of the mitigation option that is intended for delivery, evidence that the option can be delivered and finally the analysis showing that it will achieve neutrality with regards phosphorus loading in the SAC (or evidence that any residual phosphorus discharge will not result in an adverse effect on site integrity).

Your Authority should 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).

Protected Species

We have reviewed the following submission:

- Bronydd Glyn Ceiriog Preliminary Ecological Appraisal report; Stephen Cutmore; 2 June 2021

Bats and Great Crested Newts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

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 bats or Great Crested Newts, or their breeding sites and resting places at this site, provided the avoidance measures described in the Preliminary Ecological Appraisal report are implemented.

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

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,

Tristan Williams

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