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05/07/2022

Dear Sharon Holman,

BWRIAD / PROPOSAL: Cais amlinellol (cedwir pob mater yn ol) am 1 annedd / outline application (all matters reserved) for 1 dwelling

LLEOLIAD / LOCATION: 10 Ffordd Caerfyrddin, Wrexham, LL11 2LD

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 16th June 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.

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 note from the information submitted that the development has the potential to increase the amount of phosphorus being discharged from the site. The proposed method of foul drainage has not been provided within the application. As such, we refer you to our [Planning Advice](#) and advise you to seek further information from the applicant. We note that Dwr Cymru / Welsh Water within their response dated 23/06/2022 have confirmed that “capacity exists within the public sewerage network in order to receive the domestic foul only flows

from the proposed development site” and that “that Five Fords WwTW has a phosphate permit”. 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’ or ‘What does this mean for development proposals involving private sewage treatment systems’, whichever applies 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).

We refer the applicants to Welsh Government Circular 008/2018 on the use of private sewerage in new development, specifically paragraphs 2.3-2.5 which stress the first presumption must be to provide a system of foul drainage discharging into a public sewer.

Protected Species

We note that there is no information about protected species with the application, and therefore are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

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