



**Cyfoeth  
Naturiol  
Cymru  
Natural  
Resources  
Wales**

Ein cyf/Our ref: CAS-167896-R0K7  
Eich cyf/Your ref: P/2021/0917

Maes Y Ffynnon,  
Penrhosgarnedd,  
Bangor,  
Gwynedd  
LL572DW

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

ebost/email:  
northplanning@cyfoethnaturiolcymru.gov.uk

04/10/2021

Dear Sir/Madam,

**BWRIAD / PROPOSAL: RHYDDHAU AMOD 4 (DRAENIO) O AMLINELLLOL CANIATAD  
CYNLLUNIO P/2020/0627 / DISCHARGE OF CONDITION 4 (DRAINAGE) OF  
P/2020/0627**

**LLEOLIAD / LOCATION: WRENBURY COURT, WRENBURY WAY, CEFN MAWR,  
WREXHAM, LL14 3NE**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 27<sup>th</sup> September 2021.

**We have concerns with the application as submitted. We do not recommend your Authority discharges condition 4 for the following reasons.**

### **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 21<sup>st</sup> 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. As such, we refer you to our [Planning Advice](#) and advise you to seek further information from the applicant. We note that information has already been submitted in respect of Dŵr Cymru / Welsh Water confirming

that foul mains connections are acceptable but that the proposals have not yet been subject to a detailed verification in respect of the above. We therefore advise you to seek further information as identified in the bullet point list given 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).

### **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