

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

06/09/2021

Dear Sir/Madam,

PROPOSAL: ERECTION OF DETACHED DWELLING

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

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales with additional information about the above, which we received on 24/08/2021.

We continue to 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 and protected sites. If this information is not provided, we would object to this planning application. Further details are provided below.

Foul Drainage and Protected Sites

As stated in our previous response letter dated 20/08/2021 (our ref: CAS-163782-C9Y7), 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.

This application for a detached three-bedroom dwelling proposes connection of foul water to the mains sewer. As such, we refer you to our [Planning Advice](#), in particular the bullet

point list given in 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, we note from the information in your Authority's email dated 18/08/2021 that Glyn Ceiriog Wastewater Treatment Works does not have capacity to treat additional phosphorus.

On 24/08/2021 you enquired if a private treatment plant is an option for this case. At the moment, we would not accept a proposal for a private plant discharging directly to the environment. The development is within a sewered area and as such, should be connected to mains.

We would expect the applicant to liaise with Dŵr Cymru Welsh Water regarding phosphorus removal options for the Glyn Ceiriog Wastewater Treatment Works and discuss what provision could be made to remove additional phosphorus from the connection. We are aware there are companies offering solutions to private suppliers but few have the evidence to show adequate removals and therefore working with the water company to look at removing phosphorus is the preferred option.

Whilst various suggested mitigation options might be appropriate in principle, the applicant will need to 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 adverse effect of site integrity (AEOSI)).

Your Authority will need to 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 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).

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