



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-147761-S3G7
Eich cyf/Your ref: P/2021/0365

Maes Y Ffynnon,
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18/05/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: AIL-ADEILADU LLINELL DROS DRO 11KV / RE-BUILD OF 11KV OVERHEAD LINE

LLEOLIAD / LOCATION: CHIRK TO IFTON II KV LINE, CHIRK, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 04/05/2021

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if the following requirement is met. Otherwise, we would object to this planning application.

Requirement 1: Protected Sites: Further information is submitted to carry out a Habitats Regulations Assessment (HRA) under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) prior to the determination of the planning application.

Protected Sites

Special Area of Conservation (SAC)

We have concerns that a significant effect from the proposed development on the River Dee and Llyn Tegid SAC cannot be ruled out. The proposed route of the rebuilt electricity line crosses the Dee within the SAC and also crosses minor watercourses (which feed into the Dee). Otter are a feature of the site and may be present in suitable habitat adjacent to the river.

The following requirements need to be met before allowing the proposed development to proceed. We would object to the planning application if the requirements are not met.

Requirement 1: Protected Sites: Further information is submitted to carry out a Habitats Regulations Assessment (HRA) under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) prior to the determination of the planning application.

The HRA should demonstrate that there will be no adverse effect on site integrity.

An assessment of potential impacts of the development on otters, their breeding sites and resting places is required along with a method statement demonstrating how any potential impacts on otters, can be avoided/mitigated.

Should you conclude that the proposed development is likely to have a significant effect on the SAC, we look forward to being consulted on your appropriate assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Site of Special Scientific Interest (SSSI)

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

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.

Advice for the Developer

Works near Watercourse / Construction or Demolition sites

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works in, near or over watercourses' and 'Working at construction and demolition sites' which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Flood Risk Activity Permit

The rebuild proposal crosses two designated main rivers (Ceiriog and Morlas). However, we note that the line of the crossing points would remain unchanged and as such the proposal would not be subject to a Flood Risk Activity Permit from Natural Resources Wales.

Further advice and guidance is available on our website at:

<http://www.naturalresources.wales/permits-and-permissions/flood-risk-activities/flood-risk-activity-permits-information/?lang=en>

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Rhys Jones

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