Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-287419-C3N9
Eich cyf/Your ref: P/2025/0673

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 10 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Demolition of Existing Dwelling and Erection of Replacement Dwelling

LLEOLIAD/LOCATION: Tanyffordd, Ruthin Road, Bwlchgwyn, Wrexham LL11 5UU

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 01 September 2025.

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 Special Area of Conservation (SAC). In line with our *Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation* (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note from the information submitted that the proposal involves designation of an additional ground floor bedroom meaning the dwelling has the potential to increase the amount of nutrients being discharged as noted in an email from your Authority dated 04/09/25. Moreover, we note the proposal is outside of mains sewerage catchment. It is currently unclear if wastewater will be discharged into an existing private sewage system or a new private drainage system. As such, we refer you to our Advice and advise you to seek further information from the applicant. We advise you to seek further information as identified in the section titled 'Can additional wastewater be discharged to existing private

sewage treatment systems?' or 'What does this mean for development proposals involving private sewage treatment systems'.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. We therefore advise you 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 may be necessary) to demonstrate no adverse effect on site integrity.

Protected Species

We note that the information submitted in support of the above application 'Ecological Impact Assessment by Susan Worsfold BSc (Hons) ACIEEM 5th June 2025 Ref: TAN 0824' has identified that bats are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures/avoidance measures with your internal ecological advisor.

Other Matters

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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,

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

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.