Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-288896-M2K2
Eich cyf/Your ref: P/2025/0607

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 01 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: SUBDIVISION OF DWELLING INTO 2 APARTMENTS

LLEOLIAD/LOCATION: 96 ERDDIG ROAD, WREXHAM, LL13 7DR

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 22 September 2025.

We have concerns with the application as submitted. To overcome these concerns, further consideration is required regarding foul drainage. Further details are provided below.

Protected Sites and Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake 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 note the submission of a Nutrient Neutrality (Phosphorus) Assessment (Shaun Myddelton 17 September 2025) which sets the baseline for the existing 5 bed dwelling as being 7 persons.

In section 4 of the Assessment, a target efficiency of <105 L/person/day is referred to, consistent with Building regs part G. However, Part G suggests water efficiency of <125 litres/day/person.

We therefore advise that your Authority considers:

- How the figure of 105 litres per person per day has been determined
- If you agree with the existing baseline occupancy of 7 and proposed occupancy of 8.

We understand, according to the 'flows and loads – 4 code of practice', a 5 bedroom house would be considered as having an occupancy of 7 persons. The occupancy of a two-bed flat is 4 persons (therefore 8 total for two flats). The nutrient output would therefore be increased despite any proposed water efficiency measures.

Taking the information submitted into consideration, the proposed development could potentially lead to an increase of phosphorus load from the receiving wastewater treatment works into the River Dee and Bala Lake Special Area of Conservation. The majority of the River Dee catchment in Wales is currently failing to meet water quality targets for phosphorus. The nutrient impacts of new connections need to be considered on a case-by-case basis within the Habitats Regulations Assessment process. Whilst NRW permitting service has completed a Review of Water Company Discharge Permits we are currently undertaking further data analysis for the River Dee following a number of enquiries and questions from stakeholders and several ongoing Appeals. We will be able to provide further advice to your Authority once we have concluded the review.

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,

Pauline Gallagher Brown
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.