Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-291105-R7P2
Eich cyf/Your ref: P/2025/0790

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 11 November 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: OUTLINE APPLICATION FOR ERECTION OF 8 DWELLINGS (LANDSCAPING, LAYOUT AND SCALE RESERVED)

LLEOLIAD/LOCATION: HIGHFIELD HALL, WORTHENBURY, WREXHAM, LL13 0AL

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

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 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 site is located outside of the mains sewer catchment. No information has been provided regarding proposed foul arrangements; it is assumed a private sewage treatment system would be proposed to provide foul sewage for the one replacement dwelling and 7 new dwellings. The development has the potential to increase the amount of nutrients being discharged from the site. As such, we refer you to our Advice and advise you to seek further information from the applicant as identified in the section titled 'What does this mean for development proposals involving private sewage treatment systems' of that Advice. i.e.

- confirmation of how foul drainage will be managed
- clear scale plans showing the location of the proposed private sewage treatment system and discharge location
- where discharges to ground developers should provide the results of infiltration testing with calculations to demonstrate that the drainage field size and design is appropriate for the volume of discharge proposed and follows the relevant British Standard

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 a pond is located immediately adjacent to the site with records of Great Crested Newts (GCN). A further 2 ponds with GCN records are within 200m of the application site. No ecological assessment has been submitted to determine whether great crested newts (GCN), a European Protected Species, are material to the application site.

We advise that an Ecological Assessment for identifying protected species onsite (to include GCN) would be required for the purposes of informing the planning decision making process. The information submitted should include:

- Ecological Survey
- Reasonable Avoidance Measures
- Mitigation/Compensation Measures
- Site Management Scheme
- Post Construction Monitoring Plan

Based on existing information we advise that the works are carried out under licence. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

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.