Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-295334-N4P6
Eich cyf/Your ref: P/2025/0845

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 08 January 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: OUTLINE APPLICATION FOR ERECTION OF A RURAL WORKERS DWELLING (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE RESERVED)

LLEOLIAD/LOCATION: Manley Hall, Erbistock, Wrexham, LL13 0DH

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 11 December 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 (22 October 2025), 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 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. We note that the application site is outside of the public mains sewer catchment, however no information has been submitted in respect of foul drainage proposals.

We advise you to seek further information as identified in the section titled *'What does this mean for development proposals involving private sewage treatment systems'* or *'Can additional wastewater be discharged to existing private sewage treatment systems?* of that Advice.

The following further information should be submitted in support of the application:

- clear scale plans showing the location of the proposed private sewage treatment system and discharge location, including in relation to any surface water features
- where a private sewage treatment system is proposed within a sewered area, evidence to justify why a connection to public sewer is not feasible in line with Circular 008/2018 and Planning Policy Wales. For all other private sewage treatment systems, evidence that Circular 008/2018 has been followed
- where discharges to ground are proposed, 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 (BS 6297:2007+A1:2008).
- Confirmation of the maximum daily discharge rate (m^3).

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 (Jones, B. (2025). Preliminary Ecological Appraisal: Land at Manley Hall, Erbistock, Wrexham, LL13 0DH, reference PEA BJ25-234.1 dated 17/09/2025, Ben Jones Ecology) has identified that there is potential for bats to be using the application site for roosting.

Section 6.3.1 states that "potential roost features were observed in trees on the western boundary of site". We note that section 6.3.2 provides details regarding external lighting.

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 about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Rachael Burke
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.