Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-295232-T9J6
Eich cyf/Your ref: P/2024/1360

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 03 February 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: DEMOLITION OF EXISTING BUILDING AND ERECTION OF 3 DWELLINGS

LLEOLIAD/LOCATION: CHRIST THE KING CHURCH, HOLT ROAD, ROSSETT, WREXHAM, LL12 0DS

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information regarding the above, which we received on 12 December 2025.

We continue to 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.

We also advise that based on the information submitted to date, the documents identified below should be included in the approved plans and documents condition on the decision notice. Without the inclusion of these documents we would object to this planning application.

Protected Sites - 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.

This application for the erection of 3 dwelling proposes connection of foul water to the mains sewer via a package treatment plant. The proposed development could potentially lead to an increase of phosphorus load from the receiving wastewater treatment works into the River Dee Bala Lake SAC. The majority of the River Dee catchment 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.

We note the following documents submitted in support of this application:

- Surface Water Drainage Phosphorus Removal (Weetwood December 2025)
- Nutrient Neutrality Solution (Leslie Homes)

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. We advise your Authority that further consideration is required and to follow our Advice specifically the sections titled '*What does this mean for development proposals involving connection to public wastewater treatment works?*' and '*Can chemical pre-treatment be used to enable connection to a public sewer where phosphorus constraints apply?'.*

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 conclude that an Appropriate Assessment is required, the Applicant will need to provide whatever evidence they consider appropriate (seeking advice from consultants as necessary) to demonstrate no adverse effect on site integrity.

Please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). However, until the development can demonstrate it will not lead to an increase of phosphorus load from the receiving wastewater treatment works into the river we would be unable to agree with a conclusion that the proposed development would not result in an adverse effect on the integrity of the site.

Protected Species

We have reviewed the following information submitted in support of the application:

- Bat Emergence and Re-Entry Surveys (BERS). The Green, Holt Road, Rossett, Wrexham, by Arbtech, dated 9 September 2024.
- Bat Mitigation and Compensation Plan. The Green, Holt Road, Rossett, Wrexham, by Arbtech, dated 11 December 2024.

We note that the bat emergence and re-entry surveys report has identified that the application site supports roost sites for whiskered and common pipistrelle bats.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to

“demonstration of no detriment to the maintenance of the favourable conservation status of European protected species”.

We consider that the above reports provide an adequate basis upon which to consider the potential impacts of the scheme on these species and inform the decision-making process.

We consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range provided the measures set out in the submitted report are implemented.

Therefore, we advise that the following documents are included in the approved list of plans / documents condition within the decision notice:

- Bat Emergence and Re-Entry Surveys. The Green, Holt Road, Rossett, Wrexham, by Arbtech, dated 9 September 2024.
- Bat Mitigation and Compensation Plan. The Green, Holt Road, Rossett, Wrexham, by Arbtech, dated 11 December 2024.

We also 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.

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,

Rhys Jones
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.