Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-308746-Z3C9

Eich cyf/Your ref: P/2025/0824

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 11 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: CHANGE OF USE OF ANCILLARY BUILDING FROM A BOOT/HOT TUB ROOM TO AN INDEPENDENT RESIDENTIAL DWELLING

Lleoliad/Location: CROFT COTTAGE, PENYGELLI ROAD, COEDPOETH, WREXHAM, LL11 3RW

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) with amended information about the above, which we received on 15 May 2026.

We continue to have **concerns** with the application as submitted. To overcome these concerns, further consideration is required regarding foul drainage.

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, under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

This application for change of use of ancillary building from a boot/hot tub room into an independent residential dwelling proposes maintaining connection of foul water to the mains sewer. 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 SAC.

The majority of the River Dee and Bala Lake SAC River 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:

- Phosphates Supporting Statement – (Including Hot Tub Water/Leisure Use Comparison)

We note the phosphate supporting statement has utilised the All Wales Nutrient Budget Calculator to estimate the nutrient output from the proposal. Section 2.3 identifies the existing phosphorous load at 24g per annum, while section 3 estimates a post-development phosphorous load of 50g per annum, representing a net increase.

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 section titled 'What does this mean for development proposals involving connection to public wastewater treatment works?

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 any 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 advise you that the proposed development would not result in an adverse effect on the integrity of the site.

Protected Species

We note that the information submitted in support of the above application (Ecological Appraisal and Impact Assessment by Susan Worsfold, ref: CRO140621) and (Retrospective Ecological Appraisal and Impact Assessment by Susan Worsfold, ref: CRO1025) 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.

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,

Shaun Thomas

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

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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.