Ein cyf/Our ref: CAS-312908-L6L9
Eich cyf/Your ref: P/2025/0639

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 23 July 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Discharge of conditions 10 (arboricultural method statement), 11 (conservation management plan), 14 (drainage), 15 (noise), 16 (construction method statement), 18 (archaeological watching brief), 21 (final travel plan), 23 (ecological watching brief), 25 (boundary treatment) and 27 (scheme) of planning permission P/2019/0923

Lleoliad/Location: Land either side of Stansty Chain Road off A483 Trunk Road and A541 Mold Road Stansty Wrexham

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) with additional information about the above, which we received on 03 July 2026.

We have **concerns** with the application as submitted. We do not recommend your Authority discharges **Condition 11 (Conservation Management Plan)** of planning permission P/2019/0923, for the reasons provided herein. We also advise that further consideration is required regarding **foul drainage (Condition 14).** Further details are provided below.

We have no comments to make on the discharge of Conditions 10 (Arboricultural Method Statement), 15 (Noise), 16 (Construction Method Statement), 18 (Archaeological Watching Brief), 21 (Final Travel Plan), 23 (Ecological Watching Brief), 25 (Boundary Treatment) and 27 (Low and Zero Carbon Technology Scheme) as we did not request these conditions.

Condition 11

We have reviewed the updated submitted ecological report (Construction Environment Management Plan: Ecology – Stansty Chain Road, Wrexham, LL11 4YH, by Urban Green, dated June 2026).

We consider that the submitted document focuses on the construction phase of the development and is therefore not suitable, in its current form, for the discharge of Condition 11 (Conservation Management Plan).

Whilst the document contains ecological mitigation measures for protected and notable species, it does not provide sufficient detail or certainty regarding their implementation. In particular, the following information remains outstanding:

- Details of exclusion fencing required under the Reasonable Avoidance Measures Scheme for great crested newts and common lizard.
- A detailed lighting strategy demonstrating how bat commuting and foraging routes will be protected.
- A long-term biodiversity management and maintenance plan.
- A Biosecurity Risk Assessment covering the removal, control, and long-term management of invasive non-native species (INNS).
- A timetable for the implementation and long-term delivery of the Conservation Management Plan.

Any revised submission should clearly state the measures that will be implemented rather than those that could or may be undertaken. References to the Environment Agency should also be updated to Natural Resources Wales, and references to Section 41 of the Natural Environment and Rural Communities Act 2006 should be amended to Section 6 of the Environment (Wales) Act 2016.

Accordingly, we do not consider that the requirements of Condition 11 have been satisfied and do not advise its discharge at this time.

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 the construction of 455 dwellings proposes 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 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.

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.

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,

Sara Thomas

Uwch Gynghorydd - Cynllunio Datblygu/Senior Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: neplanning@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.