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SHADOW HABITATS REGULATIONS ASSESSMENT

For

Stansty Chain Road
Gwersyllt
Wrexham
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NGR: SJ 32405 51885

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1 INTRODUCTION

United Environmental Services (UES) Ltd have been commissioned by Castle Green Homes Limited to undertake a Shadow Habitats Regulations Assessment (sHRA) for the proposed development at Stansty Chain Road, Wrexham. Outline planning permission (ref. P/2019/0923) has been granted for up to 455 dwellings across three phases, subject to a prior to commencement condition requiring the submission of a detailed drainage strategy. Reserved matters applications are currently under consideration for Phase 1 (180 dwellings) and Phase 2 (188 dwellings), together with associated landscaping, public open space and on-site infrastructure. This report has been prepared in support of those reserved matters applications and the discharge of the drainage condition, and assesses the full quantum of up to 455 dwellings permitted by the outline consent.

The site extends to approximately 20.8ha of land either side of Stansty Chain Road on the north-western edge of Wrexham, bounded by Mold Road (A541) to the west and the A483 to the east, of which Phases 1 and 2 extend to approximately 14.8ha. The site predominantly comprises improved grassland fields separated by hedgerows, which are generally species-rich to the north of Stansty Chain Road and species-poor to the south, with a number of mature and veteran oak trees, pockets of plantation woodland along the site boundaries and a wet ditch crossing the southern part of the site. No ponds are present within the site (TEP, 2023b).

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (known as the 'Habitats Regulations') it is Wrexham County Borough Council's (WCBC) duty, as the competent authority, to consider the protection afforded to European sites when determining planning applications, and to ensure that developments do not have an adverse impact upon these designated sites. This report has been prepared to assist WCBC, as the local planning authority, in undertaking an appropriate assessment of the proposed development, ensuring its duty under the Habitats Regulations Assessment (HRA) is met.

There are four European designated sites located within 10km of the proposed development site. This sHRA assesses whether the proposed development will impact these designated sites and the likelihood of this occurring and causing a significant detrimental effect, both with and without mitigation.

Ecological information about the site has been drawn from the Ecology Desk Study (TEP, 2023a) and Updated Ecological Assessment (TEP, 2023b) prepared on behalf of Russell Homes (UK) Ltd in support of the outline application. This sHRA should be read in conjunction with Appendix 1, the Nutrient Assessment prepared by Brookbanks Ltd (Brookbanks, 2026), the drainage strategy prepared by Coopers (Coopers, 2026), as well as the corresponding drawings and documents that have been submitted in support of the planning applications and any consultation responses from Natural Resources Wales and other statutory bodies.

2 LEGISLATION, PLANNING POLICY AND STRATEGY

2.1 Habitats Regulations

The Conservation of Habitats and Species Regulations 2017 (known as the 'Habitats Regulations') transpose the requirements of the European Council Directives on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC) and the Conservation of Wild Birds (2009/147/EC) into UK law. The Habitats Regulations afford a high level of protection to sites designated as SPAs[1] and SACs[2]. In addition, sites listed under the 1971 Ramsar Convention (on the protection of wetlands) are also afforded the same level of protection as SPAs and SACs. SACs and SPAs are designated as areas that hold significant populations of bird species (SPAs), or areas that support habitats or rare species (other than birds) considered to be scarce or vulnerable at a European community level (SACs).

A Habitats Regulations Assessment refers to several distinct stages of assessment which must be undertaken in accordance with the Habitats Regulations to determine if a plan or project may affect the protected features of a site before deciding whether to undertake, permit or authorise it.

2.2 HRA process

All plans and projects (including planning applications) which are not directly connected with, or necessary for the conservation management of a habitat site, require consideration of whether the plan or project would lead to likely significant effects on that site.

For this assessment, European designated sites are scoped to a distance of 10km from the proposed development site. This is a commonly applied screening threshold that has been agreed through consultation stages of HRA and typically accepted and used by Natural Resources Wales for all but truly exceptional impact 'pathways' (e.g. routes for highly mobile species or impacts and functionally linked off-site supporting habitats).

A habitats assessment may have up to 3 stages:

1. Screening – to determine whether the project would give rise to likely significant effects on the internationally important interest features of the European Site, either alone or in combination with other plans and projects. If no likely significant effects are identified further stages of HRA would not be required. It should be noted, the European Court of Justice (ECJ) judgement in April 2018 in the case of "People Over Wind, Peter Sweetman v Coillte Teoranta (C-323/17)" highlighted that mitigation measures cannot be taken into account for the purposes of screening under the UK Habitats Regulations.
2. Appropriate assessment - to assess the likely significant effects of the proposal in more detail and identify ways to avoid or minimise any effects. There are no specific requirements, however the HRA report should include sufficient information for the competent authority to reasonably conclude whether the plan or project will adversely affect the integrity of the site. It should be:
    - More detailed and thorough than the screening check
    - Appropriate for the nature and complexity of the proposal and allow you to carry out the integrity test.

    The appropriate assessment should:

[1]SPA - Special Protection Area
[2]SAC - Special Area of Conservation

- Assess the likely significant effects of a proposal on the integrity of the site and its conservation objectives
- Consider ways to avoid or reduce (mitigate) any potential for an 'adverse effect on the integrity of the site'.

3. Derogation - to consider if proposals that would have an adverse effect on a European site qualify for an exemption.

2.3 Local plan

2.3.1 Wrexham Unitary Development Plan 1996–2011 (adopted 2005)

Prior to the emergence of the Wrexham Local Development Plan 2013–2028 (LDP), the statutory development plan for the area was the Wrexham Unitary Development Plan (UDP) 1996–2011, adopted in February 2005. Although the UDP was subsequently superseded by the LDP, the LDP's withdrawal in March 2026 means the Council must now rely on the UDP as part of the development plan, with more recent national policy, such as Planning Policy Wales, taking precedence over UDP policies where the two conflict. Policy EC6 of UDP is referenced below on this basis.

Policy EC6

Development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported.

2.3.2 Wrexham Local Development Plan 2013–2028 (withdrawn March 2026)

Policy NE1 and NE6 of the Wrexham Local Development Plan 2013–2028 (LDP) referenced the requirement for all relevant development proposals to ensure that there is no adverse effect on European sites. The LDP was withdrawn in March 2026 following a direction from Welsh Government issued under section 66(1) of the Planning and Compulsory Purchase Act 2004, and its policies are now formally excluded from consideration in the determination of planning applications. Policies NE1 and NE6 are set out below for context only and do not form part of the adopted development plan.

Policy NE1

Development likely to significantly affect any protected site of international importance, either alone or in combination with other plans or projects, will be subject to a Habitat Regulations Assessment (HRA). Development will only be permitted where it is possible to ascertain no adverse effect on the integrity of the habitat or site or where there are Imperative Reasons of Overriding Public Interest and compensatory measures are secured.

Permission for development likely to impact the special features of a Nationally Designated Site will only be granted in exceptional circumstances where appropriate compensation can be provided.

Development likely to affect any protected species will only be permitted when there is no satisfactory alternative and if there is no detrimental impact to the maintenance of the population concerned at a favourable conservation status in its natural range. The proposals

must adequately demonstrate that they are for the purposes of preserving public health or safety or reasons of overriding public interest

Policy NE6

All new development will only be permitted where there is no adverse effect on the integrity of the River Dee and Bala Lake SAC in particular through the treatment of wastewater.

To ensure no adverse effect on the integrity of the River Dee and Bala Lake SAC, development creating wastewater discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC.

This can be achieved through implementation of mitigation measures and associated supplementary planning guidance. Mitigation will involve, either:

i. Delivery of measures specified in the Dee Catchment Phosphorus Reduction Strategy (DCPRS), which will require:

a) Developer contributions/community infrastructure levy funds to deliver measures identified within the DCPRS to reduce phosphorus levels within the catchment;

b) Phasing of development to meet the delivery milestones within the DCPRS, and delaying development if milestones have not been met;

OR

ii. Using alternative mitigation approaches to those mentioned in 1. above. Where further evidence demonstrates that adverse effects on the integrity of the River Dee and Bala Lake SAC can be avoided using alternative mitigation, these must be agreed with the Council, in consultation with Natural Resources Wales.

3 EUROPEAN DESIGNATED SITES

There are four European designated sites within 10km of the development proposals (see Appendix 1 – European designated sites):

- Midland Meres and Mosses Phase 2 Ramsar site is located 4.5km to the north-east of the site (at its closest point)
- Berwyn and South Clwyd Mountains / Berwyn a Mynyddoedd De Clwyd SAC is located 5.3km west of the site (at its closest point)
- Johnstown Newt Sites SAC is located 5.4km to the south of the site (at its closest point)
- River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid SAC is located 8.7km to the east of site (at its closest point).

European designated sites beyond 10km of the site have not been screened into this assessment. The Dee Estuary / Aber Dyfrdwy SAC, Dee Estuary SPA and Dee Estuary Ramsar site lie downstream of the discharge point on the hydrological pathway described at Section 5.1, downstream of the tidal limit at Chester weir. Natural Resources Wales does not identify these sites as requiring nutrient neutrality in respect of phosphorus. Having regard to the distance involved, the tidal dilution occurring within the estuary, and the scale of the phosphorus contribution assessed at Section 5 below, no likely significant effect upon these sites is anticipated and they are not considered further.

3.1 Midland Meres and Mosses Phase 2 Ramsar site

Vicarage Moss SSSI (Site of Special Scientific Interest) is a component of the Midland Meres and Mosses Phase 2 Ramsar site. The Meres and Mosses form a geographically diverse series of lowland open water and peatland sites in the north-west Midlands of England and north-east Wales. These have developed in natural depressions in the glacial drift left by receding ice sheets which formerly covered the Cheshire/Shropshire Plain. The 18 component sites include open water bodies (meres), the majority of which are nutrient-rich with associated fringing habitats, reed swamp, fen, carr and damp pasture. Peat accumulation has resulted in the nutrient-poor peat bogs (mosses) forming in some sites on the fringes of the meres or completely infilling basins. In a few cases the result is a floating quaking bog or schwingmoor. The wide range of resulting habitats support nationally important flora and fauna.

3.1.1 Ramsar criteria

The designation features of the site have been designated under Ramsar criterion 1 and 2 and include:

Ramsar criterion 1
The site comprises a diverse range of habitats from open water to raised bog.

Ramsar criterion 2
Supports a number of rare species of plants associated with wetlands, including the nationally scarce cowbane *Cicuta virosa* and elongated sedge *Carex elongata*. Also present are the nationally scarce bryophytes *Dicranum affine* and *Sphagnum pulchrum*.

Also supports an assemblage of invertebrates including several rare species. There are 16 species of British Red Data Book insect listed for this site including the following endangered species: the moth *Glyphipteryx lathamella*, the caddisfly *Hagenella clathrata* and the sawfly *Trichiosoma vitellinae*.

3.1.2 Threats, pressures and activities with impacts on the site

The Ramsar information sheet for the site identifies factors (past, present and potential) known to adversely impact the ecological character of the site. Major impact pathways identified include:

- Eutrophication
- Introduction/invasion of non-native plant species
- Pollution – pesticides/agricultural run-off.

3.2 Berwyn and South Clwyd Mountains SAC

Berwyn and South Clwyd Mountains are a mosaic of blanket bog and dry heath, grasslands and escarpments. The deep peat accumulated over thousands of years along the ridge tops and plateaux support active blanket bog represented by high, stable water tables and actively growing layers of sphagnum moss. Dominated by cotton grasses *Eriophorum spp*., cross-leaved heath *Erica tetralix* and heather *Calluna vulgaris* the blanket bog remains largely unmanaged except for some light grazing during the summer months. In some areas pools of shallow water with Sphagnum carpets indicate transition mire habitats. Populations of notable rare plants including bog rosemary *Andromeda polifolia* and tall bog sedge *Carex magellanica* also thrive here.

The areas of dry heathland comprise a mosaic of different aged dry heath, with a broad age structure. This includes areas of long heather providing nesting habitat for ground nesting birds such as red grouse *Lagopus lagopus ssp. scotica*, merlins *Falco columbarius* and hen harriers *Circus cyaneus*; and areas of lower young heather, and wet flushes where birds can feed on heather shoots and invertebrates.

Many of the cracks and ledges of the limestone rocks and cliffs provide an ungrazed haven for lime tolerant plants. Some of these, particularly the cracks and fissures provide shelter for species like the ferns maidenhair spleenwort *Asplenium trichomanes* and green spleenwort *Asplenium viride*.

At the moorland edge, native broadleaved woodland with a diverse species and age structure provides sufficient suitable habitat to maintain thriving populations of the Welsh clearwing moth *Synanthedon scoliaeformis* and other characteristic and rare species.

This range of habitats supports a characteristic and varied breeding bird community which includes merlin, hen harrier, peregrine falcon *Falco peregrinus*, curlew *Numenius arquata*, red grouse, black grouse *Lyrurus tetrix* and short-eared owl *Asio flammeus*. These species rely on the heathland, acid grassland, and rushy pasture of the upland fringe supporting an adequate supply of prey species to maintain successful breeding.

3.2.1 Qualifying habitats

The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (important orchid sites)
- Transition mires and quaking bogs
- Calcareous and calcshist screes of the montane to alpine levels (*Thlaspietea rotundifolii*)
- Calcareous rocky slopes with chasmophytic vegetation.

3.2.2 Qualifying species

Not applicable.

3.2.3 Threats, pressures and activities with impacts on the site

The Natura 2000 standard data form for the site identifies the following impacts and activities with the potential to negatively impact the site:

Threat / pressure	Magnitude of impact	Source of impacts originating from inside or outside the SAC, or both
Air pollution, air-borne pollutants	High	Both
Fire and fire suppression	High	Both
Grazing	High	Inside
Human induced changes in hydraulic conditions	High	Inside
Mowing / cutting of grassland	High	Inside
Outdoor sports and leisure activities, recreational activities	Medium	Inside
Biocenotic evolution, succession	Medium	Both
Invasive non-native species	Medium	Inside
Problematic native species	Medium	Inside
Hunting and collection of wild animals (terrestrial), including damage caused by game (excessive density), and taking/removal of terrestrial animals (including collection of insects, reptiles, amphibians, birds of prey, etc., trapping, poisoning, poaching, predator control, accidental capture (e.g. due to fishing gear), etc.)	Medium	Both
Forest and plantation management & use	Medium	Inside
Soil pollution and solid waste (excluding discharges)	Medium	Inside

3.3 Johnstown Newt Sites SAC

The Johnstown Newt Sites SAC covers an area of approximately 69ha. This site lies near to Wrexham in north-east Wales and is composed of two post-industrial sites where coal and clay have been extracted. The population of great crested newts *Triturus cristatus* is one of the largest known in Great Britain and has been the focus of much conservation management over the last few years. Breeding sites are provided in part by a mining subsidence pool, and natural water-filled hollows on clay, whilst other ponds have been created as part of nature conservation management. Terrestrial habitat varies from marshy grassland, grazed farmland and swamp through to scrub and broad-leaved woodland. Good populations of the widespread amphibian species are also present.

3.3.1 Qualifying habitats

Not applicable.

3.3.2 Qualifying species

The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II: great crested newt.

3.3.3 Threats, pressures and activities with impacts on the site

The Natura 2000 standard data form for the site identifies the following impacts and activities with the potential to negatively impact the site:

Threat / pressure	Magnitude of impact	Source of impacts originating from inside or outside the SAC, or both
Other ecosystem modifications	Medium	Both
Invasive non-native species	High	Both
Mowing / cutting of grassland	Medium	Inside
Urbanised areas, human habitation	High	Both
Human induced changes in hydraulic conditions	Medium	Both
Grazing	Medium	Inside
Forest and Plantation management & use	Medium	Inside
Problematic native species	High	Both
Outdoor sports and leisure activities, recreational activities	High	Inside
Biocenotic evolution, succession	High	Both

3.4 River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid SAC

The River Dee SSSI is a component of the River Dee and Bala Lake SAC. The site lies within the River Dee SSSI impact risk zone; however, residential development is not identified as a proposal likely to cause impacts (TEP, 2023a). Natural Resources Wales' guidance, 'Principles of nutrient neutrality in relation to development or water discharge permit proposals', identifies water body GB111067057080 at the downstream end of the River Dee as an exception within the wider River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid SAC catchment. That water body, referred to throughout this assessment as the Lower Dee, is the water body into which treated effluent from the Five Fords Wastewater Treatment Works is discharged, and is therefore the focus of the assessment at Section 5 below.

The River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid SAC covers an area of approximately 1150ha. The River Dee has its source in Snowdonia at the outflow of Llyn Tegid and it includes the Ceiriog, Meloch, Tryweryn and Mynach tributaries. Its catchment contains a wide spectrum of landscapes from high mountains around Bala, rugged peaks near Llangollen and the plains of Cheshire, Flintshire, North Shropshire and Wrexham. There is a tidal influence as far upstream as Farndon and high tides regularly exceed the Cheshire weir crest level.

The SAC has been designated for its biological interest, including an abundance of water-crowfoots such as Wirtgen's water-crowfoot *Ranunculus x bachii* and pond water-crowfoot *R. peltatus*, and floating water-plantain *Luronium natans*. Water-crowfoot form extensive beds along the whole length of the Dee where flow conditions are suitable. Other aquatic plants which occur within the site include intermediate water-starwort *Callitriche hamulata*, alternate water-milfoil *Myriophyllum alterniflorum* and bryophytes including *Rhyncostegium riparoides* and *Fontinalis antipyretica*. Marginal vegetation consists mainly of reed canary-grass *Phalaris arundinacea* with occasional branched bur-reed *Sparganium erectum*.

The River Dee is also recognised as one of North Wales' premier rivers for Atlantic salmon *Salmo salar*. The Mynach, Meloch and Ceiriog tributaries are the most important salmon spawning tributaries in the Dee catchment. Other migratory fish utilising the river system include river lamprey *Lampetra fluviatilis* and sea lamprey *Petromyzon marinus*. The Dee also supports important populations of non-migratory fish including bullhead Cottus gobio and brook lamprey *Lampetra planeri*. Otter *Lutra lutra* are well established throughout the river system, especially where appropriate bank-side cover exists.

3.4.1 Qualifying habitats

The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I: watercourses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation.

3.4.2 Qualifying species

The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Atlantic salmon
- Floating water-plantain
- Sea lamprey
- Brook lamprey
- River lamprey
- Bullhead
- Otter.

3.4.3 Threats, pressures and activities with impacts on the site

The Natura 2000 datasheet for the site does not identify any activities with the potential to negatively impact the site. The Natura 2000 datasheet only identifies ecosystem modifications within the river system that may impact the SAC positively. However environmental pressures which could negatively impact the SAC include:

- Deterioration in water quality and changes in flow rates due to ex-industrial run-off
- Discharge of treated sewage effluent (which contains elevated pollutants)
- Diffuse pollution including agricultural run-off
- General pollution
- Recreational fishing
- Overfishing of Atlantic salmon
- Introduction of invasive species.

3.5 EUROPEAN DESIGNATED SITE CONSERVATION OBJECTIVES

It is a requirement of Regulation 63 that, when carrying out a Habitats Regulations Assessment, an appropriate assessment must be carried out 'in view of that site's conservation objectives'.

Conservation objectives for individual SACs are required by the 1992 'Habitats' Directive (92/43/EEC) as implemented through the Conservation of Habitat and Species Regulations 2017 (as amended). The aim of the Habitats Directive is the maintenance, or where appropriate the restoration, of the 'favourable conservation status' (FCS) of habitats and species listed in the Annexes to the Directive. Therefore, FCS provides the overarching framework for defining the conservation objectives for individual designated sites. Favourable conservation as defined in Articles 1(e) and 1(i) of the Habitats Directive:

The conservation status of a natural habitat is the sum of the influences acting on it and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species. The conservation status of a natural habitat will be taken as favourable when:

- *Its natural range and areas it covers within that range are stable or increasing, and*
- *The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and*
- *The conservation status of its typical species is favourable.*

The conservation status of a species is the sum of the influences acting on the species that may affect the long-term distribution and abundance of its populations. The conservation status will be taken as 'favourable' when:

- *Population dynamics data on the species indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and*
- *The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and*
- *There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.*

Ramsar sites are designated under a different legal process to SACs and do not have conservation objectives.

4 STAGE 1 – SCREENING & ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS

4.1 Introduction

Stage 1 of the HRA process is the assessment of likely significant effects, also known as the screening stage. The purpose of the screening exercise is to address the question, '*is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant adverse effect on the conservation objectives, designation features and integrity of the European site?*'

To address this question, the screening process must identify and consider the potential impact pathways / mechanisms by which the development proposal may lead to an adverse effect on the European designated site, either alone or in combination with other projects or plans and consider whether these impacts are likely to be significant. Mitigation cannot be taken into consideration at this stage, as per the C-323/17 People Over Wind ruling by the Court of Justice of the European Union.

4.2 Potential pathways of impact

The tables below identify and consider the potential impact pathways through which the unmitigated proposed development could adversely impact on the qualifying features of the identified European sites.

4.2.1 Midland Meres and Mosses Phase 2 Ramsar site

Environmental pressure / threat	Potential impact
Direct habitat and species loss associated with European sites.	**No likely significant effect** – the proposed development is located 4.5km to the south-west of the site (at its closest point). Given the distance, the proposed development will not result in any direct impacts on habitats or species within the European site. Therefore, this pathway is screened out.
Habitat degradation as a result of increased air pollution.	**No likely significant effect** – changes in air quality from increased traffic and development can have impacts on designated habitats of European sites. However, air pollution is not cited as a current pressure or threat to the interest features of the designated site. Therefore, this pathway is screened out of further assessment.
Changes in water levels/quality where sites are hydrologically linked to European sites.	**No likely significant effect** – potential changes to nutrient levels resulting in eutrophication brought about by the proposed residential development are unlikely given the distance of the proposed development site from the Ramsar and absence of hydrological connectivity. Therefore, this pathway is screened out.
Disturbance to habitats and species as a result of construction activities.	**No likely significant effect** – the proposed development is located approximately 4.5km (at its closest point) to the south-west of the Ramsar site. Given the distance between the proposed development site and the Ramsar site, the construction works will not result in any disturbance impacts on habitats or species within the European site. Therefore, this pathway is screened out.
Disturbance to habitats and species	**No likely significant effect** – there are no public rights of way within the designated site. Therefore, this pathway is screened out.

Environmental pressure / threat	Potential impact
through increased recreational activity, during operational stage.	
Invasive non-native species.	**No likely significant effect** – given the distance of the proposed development site from the Ramsar, combined with the absence of direct pathway and absence of dispersal route, there is considered to be no risk of adverse effects to the Ramsar through the introduction of invasive non-native species associated with the proposed development. Therefore, this pathway is screened out.

4.2.2 Berwyn and South Clwyd Mountains SAC

Environmental pressure / threat	Potential impact
Direct habitat and species loss associated with European sites.	**No likely significant effect** – the proposed development is located 5.3km from the site (at its closest point). Given the distance, the proposed development will not result in any direct impacts on habitats or species within the European site. Therefore, this pathway is screened out.
Habitat degradation as a result of increased air pollution.	**No likely significant effect** – traffic-related atmospheric nitrogen deposition can affect sensitive habitats within Air Quality Sensitive Receptors (AQSRs) close to affected roads. Guidance from the Institute of Air Quality Management (IAQM), a professional body that publishes best-practice standards for assessing air quality impacts in planning and transport, sets a screening threshold of a change in Annual Average Daily Traffic (AADT) flow of less than 1,000 vehicles on affected roads as unlikely to result in a significant effect on European sites, reducing to 200 vehicles within 200m of a European site itself. The Berwyn and South Clwyd Mountains SAC lies over 5km from the site, and the proposed access arrangements, taken from Stansty Chain Road and connecting to the A541 and A483, do not route development traffic along any new road links directly adjacent to the SAC boundary. Traffic generated by the proposed development will disperse across the strategic road network serving Wrexham, and given the separation distance involved it is not expected to generate a change in AADT on roads within 200m of the SAC that would approach the IAQM's screening thresholds. This is consistent with the Design Manual for Roads and Bridges (DMRB) LA 105 guidance, which confirms that the air quality impacts of road traffic diminish rapidly with distance from the source, such that effects at distances in excess of 200m from the affected road are generally indistinguishable from background conditions. Therefore, this pathway is screened out of further assessment.
Changes in water levels/quality where sites are	**No likely significant effect** – potential changes to hydraulic conditions brought about by the proposed residential development are unlikely given the distance of the proposed development site from

Environmental pressure / threat	Potential impact
hydrologically linked to European sites.	the SAC and absence of hydrological connectivity. Therefore, this pathway is screened out of further assessment.
Disturbance to habitats and species as a result of construction activities.	**No likely significant effect** – the proposed development is located approximately 5.3km (at its closest point) from the SAC. As a result, the construction works will not result in any disturbance impacts on habitats or species within the European site. Therefore, this pathway is screened out of further assessment.
Disturbance to habitats and species through increased recreational activity, during operational stage.	**No likely significant effect** – recreational impacts have been highlighted on the Natura 2000 data form as a threat/pressure of medium magnitude in relation to the SAC. Recreation can lead to issues such as: • Footpath erosion; • Damage to heath and blanket bog; • Off-road vehicle damage; and • Disturbance to species. There remains some, albeit limited potential that a proportion of future residents will visit the SAC for recreational purposes; at present there is no specific guidance with regards to the necessity for exclusion zones relating to new residential development associated with the SAC, in addition, conservation objectives suggest that the focus of management in this regard is on illegal 4x4 and motorbike damage rather than walkers. The proposed development will provide approximately 5.6ha of greenspace across the site (Brookbanks, 2026), including a Local Equipped Area for Play (LEAP), which will provide for the day-to-day recreational needs of residents within the site itself. Given the above, together with the separation distance of over 5km, it is considered unlikely that recreational activity arising from the proposed development will significantly affect the conservation objectives of the SAC and the favourable conservation status of its habitat interest features. Therefore, this pathway is screened out of further assessment.
Invasive non-native species.	**No likely significant effect** – given the distance of the proposed development site from the SAC, combined with the absence of a direct pathway and absence of dispersal route, there is considered to be no risk of adverse effects to the SAC through the introduction of invasive non-native species associated with the proposed development. Therefore, this pathway is screened out.

4.2.3 Johnstown Newt Sites SAC

Environmental pressure / threat	Potential impact
Direct habitat and species loss	**No likely significant effect** – the proposed development is located approximately 5.4km (at its closest point) from the SAC. As a result, the proposed development will not result in any direct impacts on

Environmental pressure / threat	Potential impact
associated with European sites.	habitats or species within the European site. Therefore, this pathway is screened out of further assessment.
Habitat degradation as a result of increased air pollution.	**No likely significant effect** – changes in air quality from increased traffic and development can have impacts on designated habitats of European sites. However, air pollution is not cited as a current pressure or threat to the interest features of the designated site. Therefore, this pathway is screened out of further assessment.
Changes in water levels/quality where sites are hydrologically linked to European sites.	**No likely significant effect** – potential changes to hydraulic conditions brought about by the proposed residential development are unlikely given the distance of the proposed development site from the SAC and absence of hydrological connectivity. Therefore, this pathway is screened out of further assessment.
Disturbance to habitats and species as a result of construction activities.	**No likely significant effect** – the proposed development is located approximately 5.4km (at its closest point) from the SAC. As a result, the construction works will not result in any disturbance impacts on habitats or species within the European site. Therefore, this pathway is screened out of further assessment.
Disturbance to habitats and species through increased recreational activity, during operational stage.	**No likely significant effect** – given the distance from site, and the reason for designation, it is considered unlikely that a potential increase in recreational activity in the area will result in disturbance to the SAC. Therefore, this pathway is screened out of further assessment.
Invasive non-native species.	**No likely significant effect** – given the distance of the proposed development site from the SAC, combined with the absence of a direct pathway and absence of dispersal route, there is considered to be no risk of adverse effects to the SAC through the introduction of invasive non-native species associated with the proposed development. Therefore, this pathway is screened out of further assessment.

4.2.4 River Dee and Bala Lake SAC

Environmental pressure / threat	Potential impact
Direct habitat and species loss associated with European sites.	**No likely significant effect** – the proposed development is located approximately 8.7km (at its closest point) from the SAC. As a result, the proposed development will not result in any direct impacts on habitats or species within the European site. Therefore, this pathway is screened out of further assessment.
Habitat degradation as a result of increased air pollution.	**No likely significant effect** – changes in air quality from increased traffic and development can have impacts on designated habitats of European sites. However, air pollution is not cited as a current pressure or threat to the interest features of the designated site. Therefore, this pathway is screened out of further assessment.
Changes in water levels/quality where	**Likely significant effect – changes in water quality as a result of new development could have impacts on European sites;**

Environmental pressure / threat	Potential impact
sites are hydrologically linked to European sites.	**indeed, discharge of treated sewage effluent is cited as a threat to the qualifying features of the SAC.** **The site is hydrologically connected to the SAC by two pathways. Foul flows from the proposed development will be treated at the Five Fords Wastewater Treatment Works (WwTW) and discharged as final effluent to the River Clywedog, which subsequently discharges to the River Dee. The site lies within the Clywedog Operational Catchment, and surface water from the site is ultimately hydrologically connected to the River Clywedog, a tributary of the Lower Dee (Brookbanks, 2026).** **In accordance with the C-323/17 People Over Wind ruling, mitigation, including the proposed sustainable drainage system, cannot be taken into account at this stage. There is therefore potential for an adverse effect on the SAC during operation via both pathways, and both are taken forward to Stage 2.**
Disturbance to habitats and species as a result of construction activities.	**No likely significant effect** – the proposed development is located approximately 8.7km (at its closest point) from the SAC. As a result, the construction works will not result in any disturbance impacts on habitats or species within the European site. Therefore, this pathway is screened out of further assessment.
Disturbance to habitats and species through increased recreational activity, during operational stage.	**No likely significant effect** – given the distance from site, and the reason for designation, it is considered unlikely that a potential increase in recreational activity in the area will result in disturbance to the SAC. Therefore, this pathway is screened out of further assessment.
Invasive non-native species.	**No likely significant effect** – Japanese knotweed *Fallopia japonica* and variegated yellow archangel *Lamiastrum galeobdolon subsp. argentatum,* both listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), have been recorded along the eastern boundary of the site (TEP, 2023b). However, the on-site ditch lacks connectivity to watercourses in the wider area, and there are no significant watercourses within 1km of the site with connectivity to it (TEP, 2023b). Given the distance of the proposed development site from the SAC, combined with the absence of a direct pathway and absence of dispersal route, there is considered to be no risk of adverse effects to the SAC through the introduction of invasive non-native species associated with the proposed development. Therefore, this pathway is screened out of further assessment.

5 STAGE 2 - APPROPRIATE ASSESSMENT

When it cannot be determined that the proposals will not have a likely significant adverse effect on a European site, the HRA progresses to Stage 2 of the process, also known as appropriate assessment.

The role of the appropriate assessment is to consider the implications of the plan or project on the conservation objectives of the European site(s) in question and determine whether the impacts of the project or plan, either alone or in combination with other projects or plans, will have a significant adverse impact upon the integrity of the Natura 2000 site(s), i.e. the site's function and conservation objectives.

In the C-323/17 People Over Wind case, the CJEU concluded that any measures intended to avoid or reduce the harmful effects of the project on a European Site should be taken into account at the appropriate assessment stage, rather than the preceding screening stage (i.e. Stage 1).

Following on from Stage 1, the only potential impact pathway scoped into Stage 2 is potential adverse effects on the water quality of the River Dee and Bala Lake SAC as a result of wastewater discharge and surface water from the proposed development.

5.1 Pathway of impact

Wastewater typically includes the foul water emanating from within a property that is subsequently processed by a Wastewater Treatment Works before being discharged to the environment. Foul water from the proposed development will be collected by an adoptable foul pumping station and pumped via a rising main to the nearest existing Dŵr Cymru Welsh Water public foul sewer along Stansty Road, to the south-east of the site (Brookbanks, 2026), subject to a Section 104 agreement with Dŵr Cymru Welsh Water (Coopers, 2026). From there it will be conveyed to and treated at the Five Fords Wastewater Treatment Works, approximately 5.0km south-east of the site (Brookbanks, 2026). Five Fords WwTW returns treated effluent to the River Clywedog and subsequently to the River Dee. The receiving works discharges into water body GB111067057080, the last reach of the River Dee and Bala Lake SAC that is considered in terms of nutrient neutrality and the Habitats Regulations. Further downstream, beyond this reach, are the tidal reaches of the Dee beyond the Chester weir. This area of the SAC is not assessed in terms of nutrient neutrality, and as nutrients are carried through dissolved and sediment migration in the direction of flow, this final reach cannot affect reaches further upstream of its discharge point.

The principal pathway of impact is therefore the increase in foul water flows generated by occupation of the proposed dwellings, treated at Five Fords WwTW and discharged as final effluent into this reach of the River Dee and Bala Lake SAC. This has the potential to increase phosphorus concentrations within the receiving watercourse relative to the existing land use. Elevated phosphorus concentrations can promote eutrophication, the excessive growth of algae and aquatic plants driven by nutrient enrichment, which in turn can reduce dissolved oxygen levels, alter aquatic plant communities and degrade water quality within the SAC, with the potential to affect the favourable conservation status of its qualifying features.

A secondary pathway arises from surface water. The site lies within the Clywedog Operational Catchment and is hydrologically connected to the River Clywedog, a tributary of the Lower Dee (Brookbanks, 2026). The drainage strategy for Phases 1 and 2 (Coopers, 2026) proposes to manage surface water by infiltration, through four infiltration basins supplemented by cellular and plot soakaways, swales, filter drains and permeable paving, rather than by direct discharge to a watercourse. The drainage of Phase 3 will be subject to separate approval by the SuDS Approving Body. The wet ditch within the site has also been found to lack connectivity to

watercourses in the wider area (TEP, 2023b). Any connection to the SAC via this pathway is therefore likely to be indirect, through groundwater. Notwithstanding this, and consistent with NRW's methodology, Brookbanks Ltd's Nutrient Assessment (2026) calculates the change in phosphorus loading associated with the change from the existing agricultural grassland, classified within the Assessment as lowland grazing across 20.80ha, to residential development, giving a loading of 24.85 kgTP/year from the proposed land covers against 2.70 kgTP/year from the existing land cover.

Brookbanks Ltd's Nutrient Assessment (2026) calculates the total net nutrient budget for the full 455 dwellings permitted by the outline consent, across all three phases, inclusive of both pathways and of the 20% buffer required by NRW's methodology, as 73.45 kgTP/year, of which 46.47 kgTP/year arises from wastewater. Both pathways are assessed further below, at Section 5.2, in the context of the current phosphorus compliance position for the Lower Dee.

5.2 Mitigation

In July 2026, Wrexham County Borough Council produced a report (report ref. COEP/45/26) providing an information update to its Planning Committee on the implications for development of phosphorus compliance in the Lower Dee, the downstream section of the River Dee and Bala Lake SAC into which the Five Fords WwTW discharges.

NRW's compliance data for the Lower Dee, covering the period 2020 to 2024 and published in March 2025, recorded a mean phosphorus concentration of 56.5µg/l against a conservation target of 50µg/l, resulting in a classification of failing. NRW assigned a low confidence rating to this classification, which was heavily influenced by a single outlier sample of approximately 335µg/l, approximately three times as high as the next available outlier and ten times as high as the average of the other recorded results. NRW considers the result technically valid and has no basis for excluding it. Correspondence with the Welsh Government indicates that diffuse rural pollution, most likely field run-off during a period of increasing river flows associated with snowmelt following dry weather, is the most likely explanation for the spike, rather than discharge from a wastewater treatment works.

To provide further evidence, WCBC commissioned an independent review comparing NRW's dataset (13 samples, 2021 to 2023) against Environment Agency (EA) monitoring data from the same location, Farndon Bridge, collected using the same methodology (36 EA samples over the same period, 97 data points in total between 2018 and 2026). The EA data for the 2021 to 2023 comparison period contains no outlier equivalent to that within NRW's dataset and, assessed on the same basis, shows this part of the SAC passing the target. When the combined NRW and EA data is assessed using NRW's own analytical approach, the Lower Dee remains below the phosphorus target, a conclusion the review found to hold even when the 335µg/l outlier is included in the analysis. On this basis, the review concluded that the Lower Dee should not be considered to be at risk of failing its phosphorus target.

Counsel's opinion, obtained by the Council, addressed how this data should be used to inform decision-making rather than the data itself. It concluded that the Council can lawfully rely on the combined EA and NRW data, rather than NRW's data alone, when determining planning applications in the Lower Dee catchment, provided it does so transparently, rationally and with clear reasons, and confirmed that the Council may exercise its own judgement under the Habitats Regulations and is not bound to accept NRW's interpretation of the data. On this basis, WCBC's report concludes that:

"… it can be concluded that a proposal within the lower Dee catchment does not adversely affect the integrity of the River Dee and Bala Lake SAC, even with a net increase in phosphorus."

The report is clear that this conclusion must be applied on a case-by-case basis through an appropriate assessment for each development, with a clear explanation of why that specific proposal does not adversely affect the integrity of the SAC, having regard to the evidence review, the case-specific facts, relevant policy, and any other material considerations. The remainder of this section applies that reasoning to the proposed development.

In addition to the position on phosphorus concentration within the receiving water body, further context is provided by the permitting position at Five Fords WwTW. NRW maintains a published register of phosphorus limits on environmental permits for wastewater treatment works, developed as part of a wider review to reduce phosphorus loading across nutrient-sensitive catchments and support the delivery of housing, undertaken in collaboration with Dŵr Cymru Welsh Water and, for the Dee catchment, the Dee Catchment Nutrient Management Board (NRW, Phosphorus limits on environmental permits for wastewater treatment work discharges; permit ref. CM0077801). Five Fords WwTW's permit was revised on 28th July 2023 to an initial phosphorus limit of 1mg/l, tightening further to 0.7mg/l from 31st March 2030. The effect of that revision is that the mass of phosphorus discharged from the works to the receiving watercourse reduces materially at any given volume of flow, and reduces again from 2030.

Brookbanks Ltd's Nutrient Assessment (2026) calculates the wastewater component of the nutrient budget using a final effluent concentration of 1 mgTP/l, being the concentration currently permitted at the works. The adequacy of the public sewerage network, and of Five Fords WwTW, to accommodate foul flows arising from the proposed development is a matter for Dŵr Cymru Welsh Water, and is addressed through the drainage strategy submitted in support of the application and the associated Section 104 approval process.

Brookbanks Ltd's Nutrient Assessment (2026) calculates the average phosphorus level, when considering both Environment Agency and NRW results, as 39µg/l. That figure includes the spurious outlier, which NRW acknowledged would require investigation. Acknowledging that outlier, the available headroom from the phosphate limit of 50µg/l is 11µg/l, which equates to 0.011mg/l. To understand what that headroom represents in kilograms of phosphorus per day, the Assessment applies NRW's own publication, the regulation leaflet 'The Dee Regulation Scheme in a nutshell', which states that the natural average flow from the Dee in the lower reach is around 36.8m³/s from a catchment of 1,816km². On that basis the Assessment calculates that 0.011mg/l equates to 34.97kg of phosphorus a day.

To calculate the predicted phosphorus load of the proposed development, the Assessment applies the calculation assumptions set out at its Table 5-1. The dwelling number of 455 is multiplied by the occupancy rate of 2.33 persons per dwelling to give an estimated new population, which multiplied by the average water usage of 120 litres per person per day gives 127,218 litres. The proposed development is therefore assumed to use 127m³/day. Using the final effluent concentration from the NRW response of 1mg/l, this equates to 0.127kg of phosphorus per day.

To put that figure into context, the proposed 455 homes would account for 0.36% of the observed swing of 11µg/l needed to breach the 50µg/l phosphorus limit, meaning that approximately 125,000 homes would need to be built to overtake the available headroom. Given that Five Fords WwTW serves 130,000 people, rather than homes, even doubling the flow from Five Fords would be unlikely to result in a consistent increase and in turn bring the Lower Dee into failure. The Assessment concludes on the basis of those calculations that the proposed development has no significant impact on the phosphorus concentrations within the Lower Dee and is therefore permissible in terms of the required 50µg/l limit for phosphorus.

By way of further context, at the average flow of 36.8m³/s cited in the Assessment, a load of 0.127kg of phosphorus per day would raise the mean phosphorus concentration within the

Lower Dee by approximately 0.04µg/l, set against headroom of 11µg/l. The conclusion that the development has no significant impact on phosphorus concentrations therefore applies to the full outline quantum, and necessarily to Phases 1 and 2 as part of it.

The Assessment further notes that planned improvements at Five Fords WwTW will ensure that the works meets a new phosphorus limit of 0.7mg/l, effective from 31 March 2030. That improvement demonstrates how the concentration of phosphorus within the Dee will decrease over time, with the result that the available headroom will only increase over the lifetime of the proposed development, which is to be delivered in phases.

The receiving water body is GB111067057080, the Lower Dee. WCBC's July 2026 report confirms that the approach it sets out applies to development and wastewater treatment works discharging into the Lower Dee catchment, and that for catchments upstream of the Lower Dee there is no change in approach, with nutrient neutrality continuing to be required by NRW, for example in respect of development at Cefn Mawr or in the Ceiriog. The proposed development discharges to the Lower Dee, and the approach set out in the Council's report therefore applies to it.

In respect of the surface water pathway, the proposed development incorporates a sustainable drainage system designed in accordance with SuDS Approving Body requirements and CIRIA guidance C815F 'Using SuDS to reduce Phosphorus in surface water runoff'. Brookbanks Ltd's Nutrient Assessment (2026) applies a 30% reduction in total phosphorus from urban surface water run-off on this basis, reducing the loading from the proposed land covers from 24.85 kgTP/year to 17.44 kgTP/year. Set against the 2.70 kgTP/year attributable to the existing land cover, the net increase arising from the change in land use is 14.74 kgTP/year. That loading is materially smaller than the 46.47 kgTP/year arising from the wastewater pathway. The calculation also takes no account of the infiltration-led design of the drainage strategy for Phases 1 and 2, under which surface water is not discharged directly to a watercourse, and is therefore a conservative estimate of the loading capable of reaching the SAC by this route. It is likewise incapable of producing a measurable change in phosphorus concentration within the SAC.

On the basis of the evidence set out above, the net increase in phosphorus arising from the proposed development is not considered significant, either alone or, as addressed at Section 5.3 below, in combination with other sources, and the proposed development is not considered to result in an adverse effect on the integrity of the River Dee and Bala Lake SAC.

It is noted, for completeness, that NRW's own published monitoring data has not been revised to reflect WCBC's July 2026 conclusion. WCBC's report confirms that NRW will be consulted on the appropriate assessment prepared for each application, with its views taken into account before a decision is made. NRW has acknowledged the outlier result as a genuine reading but has expressed low confidence in how the wider dataset should be interpreted, and has not required nutrient neutrality as a matter of policy for development in the Lower Dee, leaving this to the discretion of the Local Planning Authority; NRW has also indicated that EA data may be considered as part of its own compliance review in 2027. Notwithstanding this, there remains a risk that NRW could raise an objection to an individual application notwithstanding the Council's adopted position, and this appropriate assessment should be read alongside any consultation response received from NRW in respect of the application. This conclusion reflects the evidence and policy position as at the date of this assessment; the Council's report itself acknowledges that new compliance data, or evidence that a project alone or in combination with others could have a significant effect, would be material to future decisions.

5.3 In-combination effect

An assessment of likely significant effects under the Habitats Regulations must consider the proposed development not only in isolation, but also in combination with other plans and projects that could affect the same European site through the same pathway. In this case, the relevant pathway is the cumulative phosphorus loading to the River Dee and Bala Lake SAC arising from wastewater treatment works and other sources discharging into the Lower Dee catchment. A number of other planning applications within Wrexham are similarly connected to this catchment and have been held in abeyance pending resolution of the same phosphorus compliance position addressed at Sections 5.1 and 5.2 above, the Council's July 2026 report recording that the approach it sets out will support decision making going forward and allow those applications to be processed.

Rather than assessing the proposed development against every other current and reasonably foreseeable proposal on a scheme-by-scheme basis, the in-combination position for phosphorus in the Lower Dee is more appropriately addressed at the catchment scale. Two considerations are relevant. First, the evidence base relied upon at Section 5.2 above is itself catchment-wide: the combined EA and NRW monitoring data records the phosphorus concentration actually present within the Lower Dee, which reflects the cumulative contribution of all sources discharging to it, including existing and recently completed development. Second, the July 2023 revision of the Five Fords permit reduces the mass of phosphorus discharged from the works at any given volume of flow, with a further reduction from March 2030, such that growth served by the works is accommodated within a reducing rather than an increasing loading trajectory.

Brookbanks Ltd's Nutrient Assessment (2026) addresses the scale at which a cumulative effect could arise. It calculates that approximately 125,000 homes served by Five Fords WwTW would need to be built to overtake the available headroom of 11µg/l between the measured phosphorus concentration within the Lower Dee and the 50µg/l phosphorus limit, and that, Five Fords WwTW serving 130,000 people rather than homes, even doubling the flow from the works would be unlikely to result in a consistent increase sufficient to bring the Lower Dee into failure. The full outline quantum of 455 homes accounts for approximately 0.36% of that headroom. Set against the scale of development that would be required to produce a measurable effect, the contribution of the proposed development is not material, whether considered alone or alongside other development within the catchment.

This approach is consistent with WCBC's July 2026 committee report, which concludes that a proposal within the Lower Dee catchment does not adversely affect the integrity of the River Dee and Bala Lake SAC even with a net increase in phosphorus, a conclusion reached on the basis of the combined EA and NRW evidence for the catchment as a whole rather than by reference to any single development. The Council's report also confirms that this position remains subject to review, and that new evidence, including evidence that development is having a significant effect alone or in combination with other sources, would be material to future decisions on applications within the catchment.

On this basis, the proposed development is not considered to result in a likely significant effect on the River Dee and Bala Lake SAC in combination with other plans or projects, and is not considered to adversely affect the integrity of the SAC when assessed on this basis.

6 CONCLUSION

Four European designated sites were identified within 10km of the proposed development site. A potential effect upon the River Dee and Bala Lake SAC, as a result of potential effects on water quality arising from foul water discharge and surface water, was identified at Stage 1 (screening) and, in line with the precautionary approach required by the Habitats Regulations, was progressed to Stage 2 (appropriate assessment).

While the proposed development will result in a net increase in phosphorus at the site level when compared with the existing land use, Brookbanks Ltd's Nutrient Assessment (2026) calculates that increase for the full 455 dwellings as 73.45 kgTP/year, of which the wastewater component equates to 0.127kg of phosphorus per day. That represents approximately 0.36% of the available headroom of 11µg/l between the measured phosphorus level in the Lower Dee and the 50µg/l phosphorus limit, and the Assessment calculates that approximately 125,000 homes served by Five Fords WwTW would need to be built to overtake that headroom. The Assessment concludes that the proposed development has no significant impact on phosphorus concentrations within the Lower Dee. That conclusion is reached against the wider catchment position set out at Sections 5.2 and 5.3 above, reflecting WCBC's July 2026 committee report conclusion that the Lower Dee is not failing its phosphorus target and that development within the catchment can be accommodated without adversely affecting the integrity of the SAC, whether alone or in combination with other plans or projects.

Consequently, the development will not undermine the conservation objectives for the River Dee and Bala Lake SAC, including those directed at addressing eutrophication within the site. The development will not adversely affect the favourable conservation status of the qualifying features of the River Dee and Bala Lake SAC, nor the integrity of the site.

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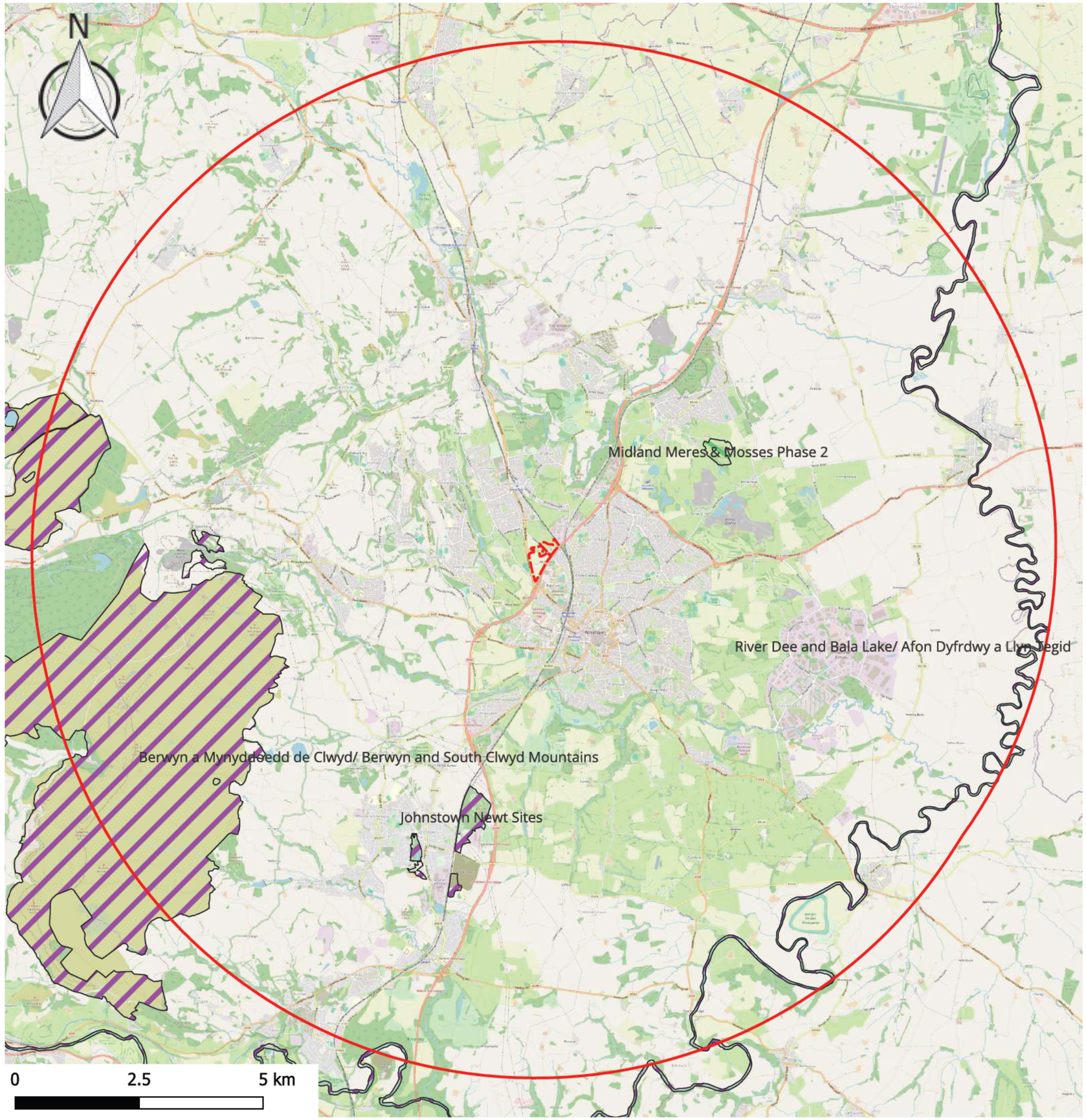
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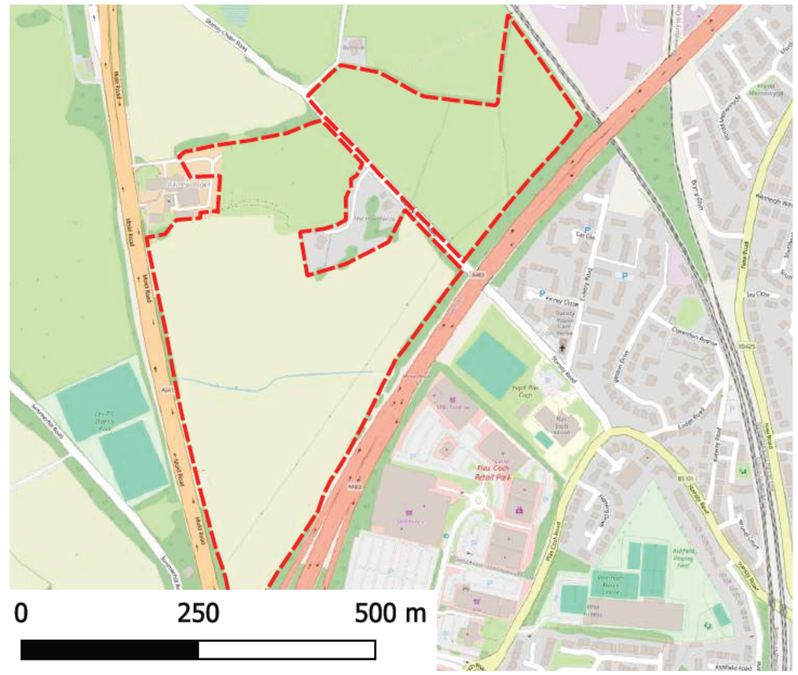
APPENDICES

Appendix 1 – European designated sites

Statutorily Designated Sites (10km buffer)

Site: Stansty Chain Road, Wrexham
NGR: (SJ) 32467 52045
Author: Harry Fox
Date: 25.09.26





- Ramsar Site
- Special Area of Conservation
- Special Protection Area
- Development boundary

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