Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-280628-V4T9
Eich cyf/Your ref: P/2025/0073

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 20 May 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CHANGE OF USE OF UPPER FLOORS TO 5 NO 2 BEDROOM FLATS, CHANGES TO SHOP FRONT TO FACILITATE ACCESS AND CONVERSION OF GROUND FLOOR RETAIL SPACE FROM SINGLE UNIT TO 2 UNITS

LLEOLIAD/LOCATION: 20-21 HOPE STREET, WREXHAM, LL11 1BG

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

We continue to have concerns with the application as submitted. To overcome these concerns, further consideration is required regarding foul drainage. 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* (28 June 2024), 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 that a water impact assessment (dated 08/05/25) has been submitted comparing potential water usage of the previous development space with water usage for the proposed residential development. We note that the calculations for the residential flats are based on a total residency of 10 occupants. However, based on the figures and floor plans submitted, we understand the proposed maximum occupancy could be 18-20 people.. We advise that any foul drainage calculations should be based on the potential maximum occupancy of the development. We therefore advise that you seek clarification on the maximum occupancy of the development in order to adequately inform your Authority's Habitats Regulations Assessment.

As previously advised in our letter dated 18 February 2025, the majority of the River Dee catchment in Wales 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. Whilst NRW permitting service has completed a Review of Water Company Discharge Permits we are currently undertaking further data analysis for the River Dee following a number of enquiries and questions from stakeholders and several ongoing Appeals. We will be able to provide further advice to your Authority once we have concluded the review.

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 there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our website. We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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,

Pauline Gallagher Brown
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.