Ein cyf/Our ref: CAS-280576-W0K9
Eich cyf/Your ref: P/2025/0390

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 23 May 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: TRAWSNEWID ADEILADAU MASNACHOL PRESENNOL AC ADEILADAU ALLANOL YN 16 O FFLATIAU UN A DWY YSTAFELL WELY A'R HOLL WAITH ALLANOL CYSYLLTIEDIG / CONVERSION OF EXISTING COMMERCIAL BUILDING AND OUTBUILDINGS INTO 16 NO. ONE AND TWO BEDROOM APARTMENTS AND ALL ASSOCIATED EXTERNAL WORKS.

LLEOLIAD/LOCATION: WHEATSHEAF WORKSHOPS, HIGH STREET, RHOSYMEDRE, WREXHAM, LL14 3YE

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

We 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

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 Special Area of Conservation. 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.

Protected Species

We note that the information submitted in support of the above application (Preliminary Roost Assessment, and Bat Emergence and Re-Entry Surveys, both by Arbtech Consulting

Ltd, dated 30/08/24) 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 and other protected species.

However, we note from the ecological reports that the bat surveys were undertaken by an ecologist holding a Natural England bat licence. Please advise the applicant that bat surveys should be undertaken by appropriately experienced ecologists holding a valid bat licence for work in Wales.

Landfill

According to our records the proposed development site is located near to land that is, or has been, used for the deposition of waste material. We would therefore advise you to consult with your Authority's Environmental Health and Building Control Departments, as they may hold detailed records, and may wish to make appropriate recommendations in respect of landfill gas investigation/remedial work. The developers should be made aware of the existence of the landfill site so that they can decide whether or not to make their own investigations into the presence of landfill gas. It should also be noted that Waste Management Paper 27 states "It has been found that many sites which have taken only supposedly 'inert' waste have produced gas".

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,

Rachael Burke
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.