Ein cyf/Our Ref: CAS-283409-J0N2
Eich cyf/Your Ref: P/2024/1618

Wrexham County Borough Council,
The Guildhall,
Wrexham,
LL11 1AY

Dyddiad/Date: 03 July 2025

Annwyl Syr/Madam / Dear Sir/Madam,

**BWRIAD/PROPOSAL: ERECTION OF 5 NO LIGHT INDUSTRIAL UNITS - CLASS B1 (BUSINESS) AND B8 (STORAGE AND DISTRIBUTION)**

**LLEOLIAD/LOCATION: THE COOPERATIVE, WELL STREET, CEFN MAWR, WREXHAM, LL14 3YD**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) about the additional information regarding this application, which we received on 25/06/2025.

**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**

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 (Bat Emergence and Re-Entry Surveys (BERS) Survey site: The Cooperative, Well Street, Cefn Mawr, Wrexham LL14 3YE by Arbtech, dated 10th June 2025) has identified that bats are not using the building to be demolished. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.

**Land Contamination**

The application site is within 15m of Rhosmedre Quarry historic landfill site and within 75m of Plas Kynaston Lane historic landfill site.

We consider that the controlled waters at this site are not of the highest environmental sensitivity, therefore we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

These comments are based on our assumption that gross contamination is not present at this location. If, during development, gross contamination is found to be present at the site you may wish to re-consult us.

We advise that the following informatives to the applicant are included within any permission granted.

Advice to applicant:

We recommend that the Land Contamination Risk Management (LCRM) guidance should be followed.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the *CL:AIRE Definition of Waste: Development Industry Code of Practice*. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste.

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

**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 on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

**Rhys Jones**
Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

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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.