



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-207323-R1N1
Eich cyf/Your ref: P/2022/0837

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

10/02/2023

Dear Sir/Madam,

BWRIAD / PROPOSAL: IMPERIAL BUILDINGS, KING STREET, WREXHAM, LL11 1HE

LLEOLIAD / LOCATION: NEWID DEFNYDD I LLAWR CYNTAF AC AIL LAWYR O SWYDDFEYDD I 14 UNED PRESWYL (10 FFLAT STIWDIO A 4 FFLATIAU UN YSTAFELL WELY) / CHANGE OF USE OF FIRST AND SECOND FLOORS FROM OFFICES TO 14 RESIDENTIAL UNITS (10 STUDIO APARTMENTS AND 4 ONE BEDROOM APARTMENTS)

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales with additional information about the above, which we received on 23.01.2023.

We continue to have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, further consideration is required regarding foul drainage. Further details are provided below.

Protected Sites - Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (July 2022), under the Habitats Regulations, Planning Authorities must consider the phosphorus 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.

This application for the change of use of offices to flats proposes connection of foul water to the mains sewer. We note the contents of version 1.1 of Foul Water Flow Rate Calculation

and Impact of Phosphates for Imperial Buildings, King Street, Wrexham by Weetwood Services Ltd, dated 10.01.2023. The information set out in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works' has been submitted with the application.

Your Authority will need 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. You should then consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

The suitability of foul drainage arrangements and whether the proposed development increases or decreases the volume of foul sewage compared to the existing development is ultimately a matter for your Authority to determine.

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.

Yours faithfully,

Sara Thomas

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales