



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-206947-D1Y0
Eich cyf/Your ref: P/2022/1057

Maes Y Ffynnon,
Penrhosgarnedd,
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LL11 1AY

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03/02/2023

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: TROI'R LLORIAU UCHAF YN DDWY FFLAT / CONVERSION OF UPPER FLOORS TO 2 APARTMENTS

LLEOLIAD / LOCATION: 18 REGENT STREET, WREXHAM, LL11 1SA

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 16/01/2023.

We 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 and 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.

We note that the submitted Design and Access Statement (D S Jones & Co., ref: 10603:DASv1) suggests a decrease in the foul drainage flows and loads based on the proposed change in use of the upper floors from office to residential.

This application for 'conversion of upper floors to two apartments' proposes connection of foul water to the mains sewer. We advise that you also seek the remaining information set out in the section of our Planning Advice titled 'What does this mean for development proposals involving connection to public wastewater treatment works'.

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).

Ultimately, the suitability of foul drainage arrangements for the proposed development is 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.

Yn gywir / Yours faithfully,

Pauline Gallagher Brown

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