



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-209316-N4P9
Eich cyf/Your ref: P/2022/1020

Maes Y Ffynnon,
Penrhosgarnedd,
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LL572DW

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Wrexham,
LL11 1AY

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

22/02/2023

Annwyl Syr/Madam / Dear Sir/Madam,

**BWRIAD / PROPOSAL: NEWID DEFNYDD O SIOPAU I ANHEDDAU A GWAITH
ADNEWYDDU / CHANGE OF USE FROM SHOPS TO DWELLINGS AND RENOVATION
WORKS**

LLEOLIAD / LOCATION: 35-39 BRIDGE STREET, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the additional information regarding the above, which we received on 13/02/2023.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding foul drainage. If this information is not provided, we would object to this planning application. 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 from the information submitted that the proposal is for the 'change of use from shops to dwellings' and therefore, the development has the potential to increase the amount of phosphorus being discharged from the site. As such, we refer you to our Planning Advice and advise you to seek further information from the applicant. We note that information has already been submitted in respect of confirming the disposal of foul sewerage will be via a connection to mains, as outlined on the application form. However, we advise you to seek

further information as identified in the section titled 'What does this mean for development proposals involving connection to public wastewater treatment works'.

Should you conclude that the proposed development is likely to have a significant effect on the SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Protected Species

We note that the bat report submitted in support of the above application ('*Preliminary Roost Assessment. 35,37,39 Bridge Street, Wrexham*' by Arbtech dated 24/11/22) was carried out after re-roofing and renovation works to the buildings had already started. As such, it has been concluded that the buildings are now of negligible value to roosting bats. For future reference, we advise that bat surveys should be carried out before works to buildings commence.

However, Table 3 of the report makes recommendations for biodiversity enhancements. Given the uncertainty regarding the building's potential of supporting roosting bats prior to the works commencing, we recommend these measures are appropriately secured in any future consent to the satisfaction of your Authority.

Please consult us again if any further information shows that this is no longer a lower risk case.

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