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

ebost/email:
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04/01/2023

Annwyl Syr/Madam / Dear Sir/Madam,

**BWRIAD / PROPOSAL: ADNEWYDDU EIDDO I'W HAIL-DDEFNYDDIO FEL RHAI
PRESWYL / RENOVATION OF PROPERTIES TO RESIDENTIAL USE**

LLEOLIAD / LOCATION: 35-39 BRIDGE STREET, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 20/12/2022.

We have no objection to the proposed development as submitted and provide the following advice.

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.

However, recognising the specific nature of the application submitted, *i.e.*, renovation of existing buildings classed as lawful dwellings with foul sewage to be disposed of via existing mains, we are satisfied that it is unlikely to increase the amount of phosphorus entering the catchment. Therefore, we are satisfied that the proposal is not likely to have a significant effect on the River Dee and Bala Lake SAC.

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