Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-286843-F1K5
Eich cyf/Your ref: P/2025/0629

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 08 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CODI FFLATIAU RHIF 27 / ERECTION OF NO. 27 APARTMENTS

LLEOLIAD/LOCATION: EBENESER (CAPEL YR ANNIBYNWYR), 2 CHESTER ROAD, WREXHAM, LL12 7AD

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 20 August 2025.

We 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

River Dee and Bala Lake Special Area of Conservation (SAC)

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 (Preliminary Ecological Assessment, Reference 10835.002, Version 1.0, dated December 2024, by The Environment Partnership Ltd.) has identified that bats and other protected species are unlikely to be using the application site.

We note that Appendix 3 of the Aboricultural Impact Assessment, Former Ebeneser Chapel, Reference 25/AIA/WXM/331, dated May 2025, by Tree Solutions Ltd. refers to a group of trees outside of the red line application boundary to "*be removed as previously approved in Planning Ref: P/2016/0337*". We recommend that you discuss the need to secure further survey/avoidance measures with your internal ecological advisor in respect of the confirmed tree removal given that the previous application (P/2016/0337) will now be out of date.

Section 5.6 of the Preliminary Ecological Assessment refers to lighting being designed in line with the Institution of Lighting Professionals Guidance Note 08/18: Bats and Artificial Lighting in the UK. It should be noted that this guidance note has been superseded by "Bats and Artificial Lighting at Night Guidance Note 08/23, Bat Conservation Trust & Institute of Lighting Professionals" (GN08/23). Therefore, any proposed lighting scheme should refer to and comply with the updated guidance note GN08/23.

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,

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

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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.