Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-287367-X8L4
Eich cyf/Your ref: P/2025/0490

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 16 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: ADDASU'R CAPEL I 2 FFLAT 3 YSTAFELL WELY, A 2 FFLAT 1 YSTAFELL WELY GYDA PHARCIO CYSYLLTIEDIG / CONVERSION OF CHAPEL TO 2 NO 3 BEDROOM FLATS AND 2 NO 1 BEDROOM FLATS WITH ASSOCIATED PARKING

LLEOLIAD/LOCATION: JERUSALEM METHODIST CHAPEL, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 29 August 2025.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Condition 1: Protected Sites

We also advise that based on the information submitted to date, the document identified below should be included in the approved plans and documents condition on the decision notice.

Approved Document: Preliminary Ecological Appraisal for Jerusalem Methodist Chapel, High Street, Johnstown, Arbtech Consulting Ltd, dated 19/08/2025

Without the inclusion of this condition and document we would object to this planning application.

We also advise that further consideration is required regarding foul drainage. Further details are provided below.

Protected Sites

Site of Special Scientific Interest (SSSI)

The application site is located within approximately 100m of the boundary of Stryt Las a'r Hafod SSSI.

This site supports a nationally important population of Great Crested Newt (*Triturus cristatus*), and an assemblage of amphibian species. From the information provided, we consider that the proposal is not likely to harm features for which the Stryt Las a'r Hafod SSSI is of special interest.

We have reviewed the submitted ecological report (Preliminary Ecological Appraisal for Jerusalem Methodist Chapel, High Street, Johnstown, Arbtech Consulting Ltd, dated 19/08/2025) and concur with the GCN avoidance measures on page 12 of the report.

The report must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

We also consider biosecurity to be a material consideration owing to the nature and location of the proposal and a case of the amphibian fungus 'Chytrid' having been recorded at Stryt Las a'r Hafod SSSI.

We therefore advise that any consent includes the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

Condition: No development, including site clearance, shall commence until a Biosecurity Risk Assessment, and Method Statement that considers invasive non-native species and specific diseases (e.g. Chytrid) has been submitted to and approved in writing by the Local Planning Authority.
The risk assessment must include:

(i) appropriate measures to control any INNS on site;
(ii) measures or actions that aim to prevent INNS from being introduced to the site for the duration of construction and operational phases of the scheme.

The Biosecurity Risk Assessment shall be carried out in accordance with the approved details.

Justification: To ensure that an approved Biosecurity Risk Assessment is implemented to secure measures to prevent or control the spread and effective management of any invasive non-native species and listed diseases at the site.

Should you be minded to grant permission for the above planning application without including the document described above within the approved documents condition attached to the permission, we ask that you notify us under the provisions contained in Section 28I of the Wildlife and Countryside Act 1981 (as amended).

The applicant should be aware that in the event of a Great Crested Newt being found on site during the work, all works should stop. Operations may only recommence after an appropriate licence has been issued by NRW

Johnstown Newt Sites Special Area of Conservation (SAC)

The application is located within 100m of the Johnstown Newt Sites SAC. This site supports a nationally important population of Great Crested Newt (*Triturus cristatus*).

We note that the ecology report (Preliminary Ecological Appraisal for Jerusalem Methodist Chapel, High Street, Johnstown, Arbtech Consulting Ltd, dated 19/08/2025) concludes that

there is a lack of suitable terrestrial habitat on site and the likelihood of GCN being present on site is low.

However, considering the location and nature of the scheme, together with the proximity of greenspace, we advise that indirect in-combination impacts on the SAC should be addressed; particularly those associated with potential in-combination increases in recreational and other pressures within the SAC.

We advise that your Authority considers appropriate measures to offset indirect impacts on the SAC, in line with your Authority's Local Planning Guidance 35: Great Crested Newt Mitigation Requirements.

No assessment of likely significant effect under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) has been undertaken by your authority or it has not been forwarded to NRW for consideration. Should you conclude that the proposed development is likely to have a significant effect on the SAC, we look forward to being re-consulted. In the absence of this assessment, NRW cannot offer assurances that the proposals would not result in an adverse effect upon the SAC.

River Dee and Bala Lake 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

Great Crested Newts

We note that the application site is within approximately 100m of the Johnstown Newt Sites SAC and Stryt Las a'r Hafod SSSI, therefore we consider that GCN are material to the application site.

This species is protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Please refer to our Protected Sites advice above in respect of Great Crested Newts.

Bats

We note that the information submitted in support of the above application (Preliminary Ecological Appraisal for Jerusalem Methodist Chapel, High Street, Johnstown, Arbtech Consulting Ltd, dated 19/08/2025) has identified that bats are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures with your internal ecological advisor.

Historic Landfill

According to our records the proposed development site is located approximately 215m from land that is, or has been, used for the deposition of waste material. We would therefore advise you to consult with the local authority's Environmental Health and Building Control Departments, as they may hold detailed records, and may wish to make appropriate recommendations in respect of landfill gas investigation/remedial work. The developers should be made aware of the existence of the landfill site so that they can decide whether or not to make their own investigations into the presence of landfill gas. It should also be noted that Waste Management Paper 27 states "It has been found that many sites which have taken only supposedly 'inert' waste have produced gas".

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.