Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-291035-C1L7
Eich cyf/Your ref: P/2025/0797

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 07 November 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Newid adeilad (annedd a gweithdai) yn 2 annedd, a newidiadau i fynediad presennol i gerbydau / Conversion of building (dwelling and workshops) into 2 no. dwellings, and alterations to existing vehicular access

LLEOLIAD/LOCATION: Bryn Eglwys, Castle Road, Chirk, Wrexham, LL14 5BS

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

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 protected species. If this information is not provided, 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 and Foul Drainage

We have concerns with the application as submitted. To overcome these concerns, further consideration is required regarding foul drainage. Further details are provided below.
We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). In line with our Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

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 have reviewed the following information submitted in support of the application:

- Bat and Bird Survey Report, The Coach House at Bryn Eglwys, dated 28/10/2025, Wildbanks Conservation

We note that the Bat and Bird Survey Report submitted in support of the above application has identified that the application site supports roost sites for the following species of bats:

- Soprano pipistrelle (n=1)
- Common Pipistrelle (n=3)
- Brown long-eared (n=1)
- Whiskered/Brandt's (n=1)

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

Based on the information submitted to date, we are unable to advise your Authority that the proposal would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

We therefore advise that a revised report and additional drawings are submitted prior to determination to inform the decision-making process as detailed below:

Section 5.11.6 provides details on the types of bat box to be installed, including one to be located "within the brickwork on eastern aspect of the garage, at the apex of the gable end wall". We have concerns with the proposed location as the 'Elevations as Proposed' drawing (reference P-20, revision A dated 29/09/25) shows a large, glazed opening which will result in light spill, potentially impacting on the proposed bat compensation roost.

Reference is also made to raised ridge tiles and a further swift and bat box. We advise that a revised drawing is submitted to show the proposed positions of all bat compensation roosts in relation to all existing and proposed openings including rooflights. The drawings should also demonstrate that flightlines to the compensation roosts are not impacted on through internal or external light spillage.

We also advise that the report is updated to include the following information:

- Details of timing, phasing and duration of construction activities and conservation measures;
- A timetable for implementation of conservation works demonstrating how works are aligned to the construction and phasing of the development;
- Persons responsible for implementing the works;
- Details regarding post-construction monitoring and record dissemination

We advise that the works are carried out under a European Protected Species licence. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises LPAs to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

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 about 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.