Ein cyf/Our ref: CAS-292678-Y8L9
Eich cyf/Your ref: P/2025/0390

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 01 December 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Trawsnewid adeiladau masnachol presennol ac adeiladau allanol yn 16 o fflatiau un a dwy ystafell wely a'r holl waith allanol cysylltiedig / Conversion of existing commercial building and outbuildings into 16 no. one and two bedroom apartments and all associated external works.

LLEOLIAD/LOCATION: Wheatsheaf Workshops, High Street, Rhosymedre, Wrexham, LL14 3YE

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 10 November 2025.

We continue to 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 and Foul Drainage

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 (22 October 2025), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

We note that a Nutrient Neutrality Assessment (reference 17176 - Foul Drainage- Nutrient Neutrality Assessment – 01, Waterco Ltd, dated November 2025) has been submitted in support of the application. The report makes an assessment based on the previous commercial uses in comparison to the proposed residential use for 16 apartments: the existing commercial use is calculated at 6484.4 litres per day and the proposed residential use is calculated to be 5940 litres per day. The submitted calculations show that there is a decrease in the foul drainage as a result of the proposed development.

We refer you to our Advice and the information set out in the section titled '*What does this mean for development proposals involving connection to public wastewater treatment works'*.

We advise your Authority to undertake a Habitats Regulations Assessment (HRA). Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity. You should then 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 information submitted in support of the above application (Preliminary Roost Assessment, and Bat Emergence and Re-Entry Surveys, both by Arbtech Consulting Ltd, dated 30/08/24) 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 and other protected species.

However, we note from the ecological reports that the bat surveys were undertaken by an ecologist holding a Natural England bat licence. Please advise the applicant that bat surveys should be undertaken by appropriately experienced ecologists holding a valid bat licence for work in Wales.

Landfill

According to our records the proposed development site is located near to land that is, or has been, used for the deposition of waste material. We would therefore advise you to consult with your 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

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,

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

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk
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.