Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-294249-Y4C4
Eich cyf/Your ref: P/2025/0772

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 12 December 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 additional information above, which we received on 27 November 2025.

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the documents identified below are included in the approved plans and documents condition on the decision notice:

- **Approved Documents: Bat and Bird Survey Report, The Coach House at Bryn Eglwys, dated 27/11/2025, Wildbanks Conservation**

Please note, without the inclusion of these documents we would object to this planning application. Further details are provided below.

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 27/11/2025, 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".

We consider that the above report provides an adequate basis upon which to consider the potential impacts of the scheme on this species and inform the decision-making process.

We consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range provided the measures set out in the submitted report are implemented.

Therefore, we advise that the following documents are included in the approved list of plans / documents condition within the decision notice:

- Bat and Bird Survey Report, The Coach House at Bryn Eglwys, dated 27/11/2025, Wildbanks Conservation

We note that the positions of the proposed bat roost features are shown in Figure 5 of the updated ecology report, you may wish to consider advising that the proposed bat roost features are included on the main architect drawings in addition to Figure 5 of the report.

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 Local Planning Authorities 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

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.