Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-294947-Q6B5
Eich cyf/Your ref: P/2025/0899

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 23 December 2025

Dear Sir/Madam,

PROPOSAL: CHANGE OF USE OF GROUND FLOOR FROM CLASS A2 (OFFICE) TO CLASS A3 (RESTAURANT) AND UPPER FLOORS FROM CLASS A2 (OFFICE) TO CLASS C3 (5 NO APARTMENTS)

LOCATION: 31 HIGH STREET, WREXHAM, LL13 8HY

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 05 December 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

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.

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 (Arbtech (31/07/2019) Preliminary Roost Assessment and Bat Emergence and re-entry survey has identified that bats are unlikely to be using the application site.

However, it must be noted that the submitted bat survey is now significantly out of date and cannot be relied upon to accurately reflect current conditions on site. In accordance with best practice and relevant guidance, ecological surveys should be up-to-date to ensure robust assessment. We recommend you seek the advice of your Authority's internal ecological adviser about the requirement for further information to be submitted in support of the application, the need for bespoke surveys and the scope of further information, where required.

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.

Yours faithfully,

Ruth Prichard
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.