Ein cyf/Our ref: CAS-312894-F2W8
Eich cyf/Your ref: P/2026/0390

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 23 July 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Change of use of building from class B1 (light industrial) to class D2 (gym)

Lleoliad/Location: Unit 26, Penley Industrial Estate, Penley, Wrexham, LL13 0LQ

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 03 July 2026.

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 and Foul Drainage

Special Area of Conservation

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

This application for change of use to a gym proposes connection of foul water to the mains sewer. 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 SAC. The majority of the River Dee and Bala Lake catchment 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.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. We advise your Authority that further consideration

is required and to follow our Advice specifically the section titled “What does this mean for development proposals involving connection to public wastewater treatment works?”

We therefore advise you to take the above into account in your determination of whether the development is likely to have a significant effect on the SAC. Should you conclude that an Appropriate Assessment is required, the Applicant will need to provide whatever evidence they consider appropriate (seeking advice from consultants as necessary) to demonstrate no adverse effect on site integrity.

Please consult us on any Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). However, until the development can demonstrate it will not lead to an increase of phosphorus load from the receiving wastewater treatment works into the river we would be unable to advise you that the proposed development would not result in an adverse effect on the integrity of the site.

Protected Species

No ecological information has been submitted in support of this application. We note that there are records of great crested newt (GCN) approximately 260m from the application site.

Section 3.3 of the Planning Statement (Unit 26, Penley Business Park, dated June 2026, Sworders) states “The site is capable of accommodating these additional vehicles within the hardstanding area around the unit.” It is our understanding therefore, that there will be no construction works required to create car parking for the proposed change of use.

We recommend you seek the advice of your Authority’s internal ecological advisor 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.

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.