Ein cyf/Our ref: CAS-314351-T0L8
Eich cyf/Your ref: P/2025/0390

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 28 July 2026

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/Natural Resources Wales (NRW) about the above, which we received on 21 July 2026.

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, 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.

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.

Protected Species

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

- Preliminary Roost Assessment, dated 30/08/2024, Arbtech Consulting Ltd
- Bat Emergence and Re-Entry Surveys, dated 30/08/24, Arbtech Consulting Ltd
- Internal and External Bat Survey, Workshop at The Wheatsheaf, dated 19/07/2026, Dr. Stefan Bodnar

We note that the information submitted in support of the above application 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.

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.