04 September 2026

Our ref: MAC2582 226277

Wrexham County Borough Council
Planning Department
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Dear Sirs

RE: CHANGE OF USE OF UNIT 26, PENLEY INDUSTRIAL ESTATE, WREXHAM LL13 0LQ
REF: P/2026/0390

I write in response to the further consultation feedback received for the above application from Natural Resources Wales (NRW) and Highways. To take each point in turn:

Highways
The Local Highway Authority has confirmed that the existing access arrangements and provision of 20 vehicle parking spaces is acceptable. It is noted that Highways now only recommend that 2 conditions are imposed on any consent granted, one for the marking out of spaces prior to use and retention of the area for parking. Whilst it is not considered necessary to mark out spaces in this area, this condition can be agreed to.

Secondly, a covered area for bicycle storage has been requested. The revised plan submitted indicates that Sheffield bike stands will be provided and gives the dimensions for height, size and distance apart, as set out in my previous letter of 04 August 2026. This is as per the Parking Standards Guidance Note 16. However, the same guidance also states that *"Hitching rings or hoops affixed to walls and buildings…"* which do not require a covered area. It is therefore felt that the proposed plans do meet the current guidelines.

Natural Resources Wales
NRW appears concerned about a **new** connection to the mains sewer. To be clear, **no new connection is sought to the mains sewer** as part of this application. The existing building is already connected to the mains sewer. In addition, as no overnight accommodation is proposed, the application should not trigger the requirement for any nutrient assessment under the Habitat Regulations.

Indeed, within the NRW "*Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation"* under the heading "*What development proposals are unlikely to increase nutrient levels within a river SAC?"* it includes "*…developments intended to provide*

services, facilities, commercial sites, or places of employment (e.g., community buildings, schools etc.) for a local population already served by residential connections to existing public or private sewers discharging within the SAC river catchment." Which is exactly what this proposal does.

Therefore, I would restate that no change is proposed to the existing arrangement, therefore there will be no increase to the nutrient impact arising from the development.

Whilst evidence of a Great Crested Newt was found approximately 260m away in 2004, in the intervening 22 years a housing development has been built between that location and the subject site. However, it is still maintained that, as the proposal does not include any external works, ground disturbance, habitat loss, or the creation of new areas of hardstanding, the proposal is not considered to have any adverse impacts upon Great Crested Newts in the wider area.

I trust this provides the information required to allow this much needed local facility to proceed.

Yours faithfully



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Director
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