Cyfoeth Naturiol Cymru
Natural Resources Wales

Our ref: CAS-317352-P7D5
Your ref: P/2026/0539

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 10 September 2026

Sir/Madam,

Proposal: Change of use from disused post office (A1) to a two-bedroom apartment.

Location: Post Office, 18 Merlin Street, Johnstown, Wrexham, LL14 1NL

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 24 August 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

River Dee and Bala Lake Special Area of Conservation

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 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 from disused post office (A1) to a two-bedroom apartment 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.

Johnstown Newts Site Special Area of Conservation

The application is located within 85m of the Johnstown Newts Site Special Area of Conservation (SAC).

From the information provided, we consider that the proposal is not likely to have a direct significant effect on the SAC due to the distance from the protected sites and the applications site's location within an existing built-up area.

However, we would advise discussion with the Local Authority's Ecologist regarding appropriate measures that may be required to offset indirect impacts on the SAC, in line with your Local Planning Guidance Note 35 - great crested newt mitigation requirements – Johnstown Newt Site SAC and the Wider Countryside

Our advice may change should modifications be made to the proposed development prior to the determination of the application. If there are any changes to the proposed development which may affect the consideration of potential environmental impacts, please consult us again before you determine the application.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for your Authority to carry out the test of Likely Significant Effects for the proposed development. Should you conclude that the proposal is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, an appropriate assessment must be made on the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify.

Site of Special Scientific Interest

We consider the proposed development has the potential to damage the Stryt Las a'r Hafod Site of Special Scientific Interest (SSSI) and notified features. Providing the impact pathways referenced above for the Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar site are adequately addressed, NRW consider the notified features of the SSSI will also be adequately safeguarded.

Protected Species

No ecological information has been submitted in support of this application. We note that there are records of bats and great crested newts in the vicinity of the site. 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,

Inoka Manatunga

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: neplanning@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.