Mr Belal Rashid
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11 Queen Street
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24th September 2026

Dear Sir

WREXHAM COUNTY BOROUGH COUNCIL PLANNING APPLICATION P/2026/0353 FOR THE PROPOSED CHANGE OF USE TO SECOND FLOOR FROM OFFICES TO 6 SELF CONTAINED FLATS AT 22 TO 26 LORD STREET & 10 TO 14 EGERTON STREET, WREXHAM, LL11 1LR

Dear Sir,

1.00 INTRODUCTION

1.01 The consultation response from Natural Resources Wales (NRW) dated 30th June 2026 (Reference CAS-311648-M5Q7) stated:

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 the change of use from offices to 6 self-contained flats 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. We acknowledge the email received from the planning officer dated 22 June 2026, confirming the proposal would likely result in an increase in nutrients from the site. 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.

1.02 For reference, phosphorous is a nutrient that occurs naturally in low levels and is necessary for the healthy functioning of rivers. It is released slowly at low levels from natural sources, from natural bankside erosion for example. However, in high levels it is the most harmful nutrient in freshwater and can lead to eutrophication. Eutrophication happens when an excess of nutrients causes a dense growth of plant life and subsequent death of animal life due to lack of oxygen.

1.03 The main sources of phosphorous are from agriculture (found in fertilisers and runoff from manure) and sewage (from homes and other developments (such as commercial premises and offices) that generate wastewater containing sewage, food waste and cleaning products)

1.04 Any proposals for development within SAC river catchments (particularly those that will generate increased volume or concentration of wastewater) must now prove that the design will not contribute to increased phosphorus levels.

1.05 The River Dee is designated as a SAC, and the majority of Wrexham County Borough is located within its catchment. The river is currently failing against NRW's targets. Until Wrexham County Borough Council have received further guidance and are able to measure and mitigate the impact on phosphorus levels, it is unable to determine some planning applications in these SAC areas.

1.06 This is not unique to Wrexham - this has affected other Welsh local planning authorities and many construction projects across Wales have been put on hold.

1.07 Types of development that may be affected include (this list is not exhaustive and is subject to review):

- New residential units including homes, gypsy and traveller sites/pitches
- Tourism attractions and commercial developments where overnight accommodation is provided
- Agricultural development, including prior notifications including additional barns and slurry stores likely to lead to increased herds
- Prior notifications for change of use of office to homes and agricultural buildings to homes (as is the case in this instance)
- Operations which generate phosphorus such as fisheries and car washing facilities

1.08 The application site (which is, of course, connected to the public foul drainage system) generates an existing phosphors load from its use as offices. The fundamental question is therefore whether there will be an increase or a decrease in the phosphorus load discharged into the public foul drainage system with the proposed change of use from offices to 6 no. 1-bedroom apartments.

1.09 In terms of the phosphorous loading, reference is made to 'Identifying Human Waste Contribution of Phosphorus Loads to Domestic Wastewater' by Gilmour, Blackwood, Comber and Thornell.

1.10 This paper describes an approach to identify the phosphorus contribution of faeces and urine in domestic wastewater as part of a model verification exercise for a collaborative project between UK Water Industry Research (UKWIR), Scotland & Northern Ireland Forum for Environmental Research (SNIFFER) and UK Technical Advisory Group (UKTAG).

1.11 The approach develops a methodology used in recent investigations by University of Abertay Dundee, by combining behaviour questionnaire with in sewer sampling and flow monitoring. The approach aimed to reduce the uncertainties associated with the apportionment of Total Phosphorus (TP) from domestic sources. A domestic sub-catchment was identified which could be isolated, sampled and analysed to identify domestic contribution of TP load in domestic foul water, also determining the significance of laundry and dishwasher phosphorus contributions to domestic wastewater.

1.12 The load to sewer (grammes total Phosphorus per person per day) is as follows:

	g-TP/person/day
• Laundry	0.39
• Automatic dishwashers	0.15
• Faeces	0.50
• Urine	0.90
• Main supply	0.12
Total	**2.06**

1.13 There are 6 no. 1-bedroom apartments proposed. The maximum occupancy is therefore 12 persons and thus the maximum phosphorus load from the proposed residential use is 24.72 g-TP/day (= 12 x 2.06).

1.14 There is no laundry (washing machine) and automatic dishwasher within the offices. This reduces the phosphorous load to 1.52 g-TP/person/day (= 2.06 – 0.39 – 0.15). The maximum occupancy of the offices is 82 persons and thus the maximum phosphorous load from the offices use is 124.64 g-TP/day (= 82 x 1.52).

1.15 The proposed residential development therefore shows a significant reduction in the maximum phosphorus load into the mains sewer in comparison to office use.

Yours sincerely

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