Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-320599-V8R6
Eich cyf/Your ref: P/2025/0697

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 19 October 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Hybrid planning application: a) full planning permission for change of use of warehouse to class B2 (brewery) and the change of use of building to a museum/taproom/restaurant/shop, and b) outline planning permission for a new commercial office building, creation of public realm and landscaping, accessibility improvements including new highway infrastructure and pedestrian footbridge, parking facilities and coach/taxi drop off (some matters reserved)

Lleoliad/Location: Land At Wrexham General Railway Station, Station Approach, Wrexham, LL11 2AA

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the additional information for the above, which we received on 02 October 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.

We also advise that based on the information submitted to date, **conditions** regarding **contaminated land** should be attached to any planning permission granted. Without the inclusion of these conditions we would object to this planning application.

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.

This application for the change of use of existing warehouse to a brewery, museum, taproom, restaurant and shop; and the construction of new commercial office

accommodation 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 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.

We note that a Nutrient Neutrality report (Wrexham Gateway, Revision 2 dated 29/09/2026, Civic Engineers limited) has been submitted in support of the application.

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.

Contaminated Land

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

- Wrexham Gateway, Wrexham Sites A and B (Application Site) – Phase 1 Desk Study, Civic Earth, reference 51146-CE-XX-XX-R-G-1001, Status P01, Issue 1, dated July 2025.

Following our review of the desk study we agree that site investigation and risk assessment with respect to controlled waters is required; this is due to the previous historical land uses. We note that fuel tanks have been identified on site which need focused targeted site investigation that includes above ground and below ground tanks. We recommend these are removed from site.

To ensure this site investigation works are completed, we request the following suite of land contamination conditions and informative be imposed on any planning permission granted.

In addition to the planning conditions, Environmental Permits from NRW may be required (during construction and operation) and we recommend early consultation with the relevant permitting teams to ensure all permits are in place prior to commencement of development.

Condition 1: Contaminated Land Scheme

No development, of land known to be or suspected of contamination, shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification: To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

Condition 2: Verification Report

Prior to the operation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification: To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated prior to occupation or operation, to prevent both future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Condition: Long-term Monitoring Plan

Prior to the occupation or operation of the development, a long-term monitoring plan for land contamination shall be submitted and approved in writing by the Local Planning Authority. The long-term monitoring plan should include:

- Details of the methods and triggers for action to be undertaken.
- Timescales for the long-term monitoring and curtailment mechanisms e.g. a scheme of monitoring for 3 years unless the monitoring reports indicate that subsequent monitoring is or is not required
- Timescales for submission of monitoring reports to the LPA e.g. annually
- Details of any necessary contingency and remedial actions and timescales for actions
- Details confirming that the contingency and remedial actions have been carried out.
- The monitoring plan shall be carried out in accordance with the approved details, within the agreed timescales.

Justification: A long-term monitoring plan should be submitted prior to occupation or operation, to ensure necessary monitoring measures are approved to manage any potential adverse impacts as a result of development on controlled waters.

Condition 3: Unsuspected Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

We note foul water will be disposed of to the existing local mains sewer network. For surface water runoff the proposed disposal appears to be via infiltration methods, we recommend site investigation to make sure the ground conditions are suitable for coping with the required volumes to be disposed of and that infiltration is away from areas where historical contamination was present to reduce the risk of mobilisation.

If the ground is not suitable and alternative disposal methods are proposed, please reconsult us for further representations.

Condition 4: Surface Water Drainage

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Justification: To prevent pollution to the water environment.

Informative/ advice to LPA

These conditions have been recommended as Natural Resources Wales is satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site. However, further details will be required in order to ensure that risks are appropriately addressed prior to development commencing.

In line with the advice given in Planning Policy Wales we understand that the Authority must decide whether to obtain such information prior to determining the application or as a condition of the permission. Should the LPA decide to obtain the necessary information under condition we would request that this condition is applied.

Protected Species

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

- Great Crested Newt (GCN) Addendum Report, Wrexham Gateway, reference FE500/GCN01 dated June 2026, Futures Ecology Ltd
- Bat Survey Addendum Report, Wrexham Gateway, reference FE500/BSR01 dated June 2026, Futures Ecology Ltd

Great Crested Newt

In our previous response dated 28 October 2025 (reference CAS-290038-Y7G1) we advised that the results of the proposed eDNA surveys should be submitted.

Section 5.1 of the GCN Addendum Report confirms that an eDNA survey was carried out on one pond (P1), and a negative result was returned.

We therefore have no further comments in relation to GCN.

Bats

In our previous response dated 28 October 2025 (reference CAS-290038-Y7G1) we advised that further survey of buildings 1 and 2 (B1 and B2) was needed, in agreement with the recommendations of the Ecological Impact Assessment report (dated July 2025, Futures Ecology Ltd).

Emergence surveys have been completed on B1, B2 and also B5, sections 4.4 (B5) 4.6 (B1 B2) and 4.8 (B5) confirm no emergence or re-entry of bats during the surveys.

We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures and avoidance measures with your internal ecological advisor in relation to sections 4.2 (B5) 4.5 (B1 B2) and 4.7 (B5) confirming that commuting and foraging activity was observed during the surveys.

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.

Advice to Developer

Natural Resources Wales recommends that developers should:

- Follow the risk management framework provided in Land contamination risk management (LCRM)
- Refer to 'Land Contamination: a guide for developers (WLGA, 2017) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to our groundwater protection advice on www.gov.uk

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

Permitting Advice

The applicant/ operator will need to review the permitting guidance for installations on NRW's website.

Natural Resources Wales / Find out if you need an Environmental Permit for your installation

Depending on the scale of operations and proposed activities, an environmental permit may be required.

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.