Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-313003-T2R2
Eich cyf/Your ref: P/2026/0415

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 26 October 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Change of use of part of ground floor, first and second floors of building to 6 flats

Lleoliad/Location: 56 Pen y Bryn, Wrexham, LL13 7HY

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 06 July 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 – 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 part of ground floor, first and second floors of building to 6 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. The majority of the River Dee and Bala Lake SAC 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.

Protected Species

We note that the information submitted in support of the above application (Preliminary Roost Assessment for Acton Gate Audio, Wrexham by Ben Jones Ecology dated 21 May 2026) 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.

We recommend that you discuss the need to secure further measures with your internal ecological advisor.

Historic Landfill

The site is located within 10 metres of the historic Parciau landfill site. As no groundworks are proposed, NRW does not consider controlled waters at the site to be highly environmentally sensitive and is therefore not providing detailed site-specific advice on land contamination matters.

It is recommended that the requirements of Planning Policy Wales and the Land Contamination Risk Management (LCRM) are followed when considering land contamination risks associated with the site.

These comments are based on our assumption that gross contamination is not present at this location. If, during site investigation or development, gross contamination is found to be present at the site the Local Planning Authority may wish to re-consult us.

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,

Sara Thomas

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.