Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-283880-F4C8
Eich cyf/Your ref: P/2024/1540

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 18 July 2025

Dear Sarah Duckworth,

**BWRIAD/PROPOSAL: OUTLINE APPLICATION FOR ERECTION OF DWELLING (ALL MATTERS RESERVED) (DEMOLITION OF EXISTING DWELLING)**

**LLEOLIAD/LOCATION: CRISPIN LODGE, MOLD ROAD, STANSTY, WREXHAM, LL11 4YF**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 03 July 2025.

**We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected species. If this information is not provided, we would object to this planning application. Further details are provided below.**

**Protected Species**

We have concerns about the above proposal and advise that further information is submitted in support of the application to assess the impacts of the proposal on bats, as European Protected Species. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

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

- Preliminary Ecological Appraisal and Roost Assessment, arbtech, Survey date: 6th December 2024
- Arboricultural Impact Assessment & Method Statement, Tree Solutions Ltd, Ref: 24/AIA/WXM/324, October 2024

We note that the submitted Preliminary Ecological Appraisal report has identified that bats may be present at the application site. However, the Bats recommendation section of the report advises that further survey work is required in the form of emergence surveys of 3 buildings and trees to be felled on the site. We concur with this advice.

We advise that the additional survey work recommended in the report is undertaken and results submitted prior to determination of this outline application to ensure that where any compensation is required, that this can be provided effectively. Surveys should be undertaken in accordance with published best practice. If evidence of bat use is found, suitable avoidance, mitigation or compensation measures should also be provided as appropriate to the species and their use of the site.

Based on the application, as submitted, we are unable to provide your Authority with any assurance that the proposal would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

**Protected Sites**

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* (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

However, recognising the specific nature of the application submitted, i.e. demolition and rebuild of a dwelling, therefore no increase in residential units, we are satisfied that there is unlikely to be a source of additional nutrients and/or a pathway for impacts. As such, in our opinion, it would be reasonable for your Authority to screen out this proposal as not likely to have a significant effect on the River Dee and Bala Lake SAC in relation to nutrient inputs.

However, we would advise that the existing and proposed method of foul drainage is confirmed within any reserved matters application.

**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 on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

**Gareth Thomas**
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
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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.