Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-285071-C7K5
Eich cyf/Your ref: P/2025/0560

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 11 August 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CHANGE OF USE OF UNIT TO ENABLE STORAGE AND MAINTENANCE OF VEHICLES LINKED TO THEIR COMMERCIAL HIRE AND ASSOCIATED DEVELOPMENT (SUI GENERIS USE)

LLEOLIAD/LOCATION: GARRON HOUSE, CLYWEDOG ROAD SOUTH, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9XS

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 23 July 2025.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Condition 1 – European Protected Species: GCN Reasonable Avoidance Measures Scheme (RAMS)

Please note, without the inclusion of this condition we would object to this planning application. Further details are provided below.

Protected Species
We note that the there is a waterbody close to the site [85m to the west] for which we hold breeding records of Great Crested Newts (GCN). GCN, their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).
We therefore consider GCN, a European Protected Species, are material to the application site as individuals of this species are likely to utilise the hedgerow along the western boundary of the development site for foraging, dispersal and sheltering purposes.

No ecological assessment has been submitted in support of this application. The information in the Green Infrastructure Statement dated July 2025 by DEP Landscape Architecture, states that all existing vegetation on site will be retained and enhanced with additional planning along the western boundary. We welcome this biodiversity enhancement.

Notwithstanding the above, in our view, we consider that the construction phase of the proposal have the potential to adversely affect GCN, however, provided reasonable avoidance measures are adopted we consider that the development is not be likely to be detrimental to the maintenance of the favourable conservation status of the GCN populations and we advise that any subsequent consent is subject to the imposition of a condition that will secure the implementation of appropriate RAMS.

Condition 1 – European Protected Species: No works shall take place until a Reasonable Avoidance Measures Scheme for Great Crested Newt has been submitted to and approved in writing by the local Planning authority.

If GCN are found or seen during works, all work must stop immediately and advice sought from NRW before works can restart.

Protected Sites
We note the application site is within the catchment of the River Dee 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, commercial site, and in our Advice, 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 SAC in relation to nutrient inputs.

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 for the Developer

Environmental Management & Pollution Prevention
Our map data has identified a culvert that runs under the development site along the western boundary.

The culvert appears to connect to a watercourse that discharges to the Afon Clywedog. If the layout of the parking spaces requires excavation, there is a risk of damaging the culvert which has potential to lead to a pollution incident.

Therefore, we advise that precautions should be taken to prevent contamination of surface water drains and local watercourses and works should adhere to Guidance for Pollution Prevention (GPP) 5 that can be accessed on the NetRegs website.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Cinzia Sertorio
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: MidPlanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 65 4696

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.