Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-286856-K4J7
Eich cyf/Your ref: P/2025/0639

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 04 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Discharge of Conditions 10 (Arboricultural Method Statement), 11 (Conservation Management Plan), 14 (Drainage), 15 (Noise), 16 (Construction Method Statement), 18 (Archaeological Watching Brief), 21 (Final Travel Plan), 23 (Ecological Watching Brief), 25 (Boundary Treatment) and 27 (Scheme) of Planning Permission P/2019/0923.

LLEOLIAD/LOCATION: Land Either Side of Stansty Chain Road Off A483 Trunk Road and A541 Mold Road, Stansty, Wrexham, LL11 4Y.

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales (NRW) about the above, which we received on 20 August 2025

We have concerns with the application as submitted. We do not recommend your Authority discharges Condition 11 (Conservation Management Plan) of planning permission P/2019/0923, for the following reasons. We also advise that further consideration is required regarding foul drainage (Condition 14). Further details are provided below.

We have no comments to make on the discharge of Conditions 10 (Arboricultural Method Statement), 15 (Noise), 16 (Construction Method Statement), 18 (Archaeological Watching Brief), 21 (Final Travel Plan), 23 (Ecological Watching Brief), 25 (Boundary Treatment) and 27 (Low and Zero Carbon Technology Scheme) as we did not request these conditions.

Condition 11 (Conservation Management Plan)

We have reviewed the submitted ecological report (Construction Environment Management Plan: Ecology – Stansty Chain Road, Wrexham, LL11 4YH, by Urban Green, dated 13/08/2025). We advise that the submission does not provide sufficient information for this condition to be discharged, for the reasons explained below.

1. *Reasonable Avoidance Measures (RAMs) Scheme for Great Crested Newts and common lizard (to include details of measures such as fence construction and maintenance).*

   No details concerning fencing have been submitted.

2. *A lighting scheme and external lighting to be compliant with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/18: Bats and Artificial Lighting in the UK.*

   External lighting is referenced in Section 5.2.4 of the CEMP. However, we consider the proposals, including the plans for both construction and operational phases, to be inadequate for the purposes of discharging this condition. We advise that plans are submitted that clearly identify dark corridors, along with details of the type of external lighting, and the measures that will be undertaken to ensure the integrity of dark corridors.

3. *Measures to deliver net benefit to biodiversity, to include a long term management and maintenance plan.*

   The submission does not include a long-term conservation management and maintenance plan.

4. *Biosecurity Risk Assessment for the removal, control and long term management of invasive species during construction and following completion of the development.*

   The provisions of the submission do not include a biosecurity risk assessment and do not include or consider long-term INNS management.

5. *A timescale for the implementation of the Conservation Management Plan.*

   No timescales for implementation or long-term delivery of the Conservation Management Plan have been submitted.

We therefore do not recommend that your Authority discharges Condition 11 until the above aspects have been satisfactorily addressed.

Condition 14 (Drainage)

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 Special Area of Conservation. The majority of the River Dee catchment in Wales 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. Whilst NRW permitting service has completed a Review of Water Company Discharge Permits we are currently undertaking further data analysis for the River Dee following a number of enquiries and questions from stakeholders and several ongoing Appeals. We will be able to provide further advice to your Authority once we have concluded the review.

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,

Rhys Jones
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.