Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-286431-Q8H9
Eich cyf/Your ref: P/2025/0431

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 11 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: NEWID DEFNYDD TIR O AMAETHYDDIAETH I ARDALOEDD LLINIARU ECOLEGOL YNGHYD AG ADEILADU BYNDIAU / CHANGE OF USE OF LAND FROM AGRICULTURE TO ECOLOGICAL MITIGATION AREAS TOGETHER WITH CONSTRUCTION OF BUNDS

LLEOLIAD/LOCATION: LAND OFF, FRANCIS LANE, RIDLEY WOOD, WREXHAM, LL13 9YB

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 13 August 2025.

Please note that this response is only in relation to the additional information provided (Precautionary Working Methods Statement and the GCN Conservation Plan). There are other matters relating to protected species in our previous response dated 07/07/2025 (reference CAS-281972-V4L5) that remain outstanding and valid when considering the determination of the application.

We continue to 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 note from section 1.5 of the Planning, Design and Access Statement (reference J0082108, revision 01b, dated May 2025, Carter Jonas) that the proposed Strategic Ecology Corridor (SEC) is intended to provide off-site mitigation in relation to three separate Net World Sports development proposals at Wrexham Industrial Estate. The three sites are confirmed as the following in section 1.3 of the report:

- Land North of Bryn Lane, P/2023/0497 – also referred to as Utopia City
- Land South of Bryn Lane, P/2025/0143
- Net World Sports Headquarters – expansion plans not yet submitted

We have reviewed the following additional information submitted in relation the proposed Strategic Ecology Corridor:

- Precautionary Working Method Statement, Strategic Ecology Corridor, Document reference 10944.004 Version 2.0 dated July 2025, The Environment Partnership Ltd
- GCN Conservation Plan, Strategic Ecology Corridor, Version Number 9134.026 V3, dated August 2025, The Environment Partnership Ltd

Our updated comments refer only to the Precautionary Working Methods Statement and the GCN Conservation Plan, all other comments in relation to protected species in our previous response dated 07/07/2025 (reference CAS-281972-V4L5) remain valid.

Strategic Ecology Corridor

We note that the proposed ecological features and habitat provision within the land parcels comprising the overall SEC, these proposals are welcomed in principle.

- *Precautionary Working Method Statement (PWMS)*

We note the submission of the PWMS and advise that the following points are addressed and submitted in an updated PWMS:

- Section 2.7 of the PWMS refers to the Conservation Habitats and Species Regulations 2010 and Section 41 of the NERC Act 2006. Theses refences should be amended to the - Conservation of Habitats and Species Regulations 2017 (as amended) and Section 42 of the NERC Act 2006.
- We welcome the inclusion of a toolbox talk as detailed in Section 2.9, however we advise that the talk should also include biosecurity provisions, reference to the planning conditions and the licence conditions including implications for non-compliance.
- Section 2.14 refers to “any common amphibians being encountered during the works will be captured by the ecologist and translocated”. The text should be amended to state that if GCN are encountered, they can only be moved under the appropriate European protected species derogation licence.
- Section 2.15 provides details regarding Standard Precautionary Working Measures – no reference is made to amphibian fencing. Details regarding the specification and location of amphibian fencing should be provided within the PWMS document (please also refer to comments below regarding temporary fencing specification in the submitted GCN Conservation Plan).
- We note the inclusion of the drawing “G9134.042 Great Crested Newt Off-Site Mitigation Phasing Plan” and advise that each phase of the SEC accords with the applicable off-site development and that your Authority secures this phasing in an appropriate way.

- *GCN Conservation Plan*

We note the submission of the GCN Conservation and advise that the following points are addressed and submitted in an updated GCN Conservation Plan:

- Section 1.7 states “During the construction process, an ecological compliance audit scheme carried out by an externally appointed body will be instated. This will involve four visits per year, for each year that construction works are ongoing.” We welcome this approach however, defined aims and objectives including defined key performance indicators for long term monitoring should be submitted.
- Section 1.32 states that eDNA surveys will be carried out to “*determine whether the SEC is meeting its objectives*”. We consider that this proposed surveillance methodology is unsuitable for the purposes of monitoring species population numbers at this locality, however we note the provisions of sections 1.96 – 1.99 includes population monitoring surveys.
- Section 1.68 refers to Annex 2 which contains the Temporary Amphibian Fencing (TAF) specification. The drawing shows the fencing to be within 200mm and 300mm depth underground, we consider this to be too shallow, and the fencing depth should be increased to between 300mm and 350mm depth underground.
- Section 1.71 states that the TAF will be inspected and “*Any damage will be repaired the same day*”, we welcome this approach however no information on how frequently the TAF would be inspected is given other than “*routinely*” – we advise that the TAF is monitored once every 24hrs as a minimum.
- We note that section 1.81 confirms that the site liaison and wardening will be “*TEP or an appropriate wildlife body. This body will hold a NRW GCN licence and have experience with GCN mitigation sites*”, and section 1.82 states “*Habitat management will be undertaken by an appropriate wildlife body or landscape management company with the necessary licences to carry out works in relation to GCN or any other protected species noted at site*”. We advise that habitat management is to be undertaken or contracted by a body (either owner or occupier of the land) that accords with the definition of a responsible body under Part 7 of the Environment Act 2021.
- Sections 1.96 – 1.99 provides details regarding the proposed monitoring for the SEC. We advise that the monitoring section is amended to include the following provisions:
    - The monitoring methodology shall accord with the Wales GCN Monitoring scheme, and the results should be reported through their online database
    - All data shall be uploaded by 30 September each year
- Section 1.97 refers to carrying out eDNA surveys – eDNA surveys are not considered to be necessary for long term site monitoring purposes.
- We advise that the following Key Performance Indicator is included in section 1.100:
    - Target GCN population for each of the land parcels 1-4 = 25 per parcel

Whilst we consider the above reports and plans provide an adequate basis upon which to consider the potential impacts of the separate planning applications and the SEC on this species, the information outlined above should be submitted in support of this 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,

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.