

Ein cyf/Our ref: CAS-286961-M4W5
Eich cyf/Your ref: P/2024/0105

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 12 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Pwynt Cyrraedd Newydd Ar Gyfer Safle Treftadaeth Y Byd Traphont Ddwr Pontcysyllte, Yn Cynnwys Lle Parcio, Tirlunio, Llwybrau Troed, Arwyddion, Pyllau Draenio A Ffensio Ychwanegol / New Arrival Point To Pontcysyllte Aqueduct World Heritage Site, Including Parking, Landscaping, Pathways, Signage, Drainage Ponds And Additional Fencing

LLEOLIAD/LOCATION: Car Park, Queen Street, Cefn Mawr, Wrexham, LL14 3NN

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 21 August 2025.

Please note that this response is only in relation to the additional information provided (GCN Conservation Plan). There are other matters relating to protected species, contaminated land and protected sites in our previous response dated 15/01/2025 (reference CAS-270749-F5D0) 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

Section A of the previously submitted Draft GCN European Protected Species Licence Method Statement (Arcadis, reference: 10054502-ARC-XX-XX-XX-GCN_EPSL_MS) confirms incidental records of Great Crested Newts (GCN) within the Donor site and eDNA samples obtained from three ponds within the proposed Receptor sites returned positive results for GCN.

The information has identified that great crested newts (GCN) are material to the application site.

We have reviewed the following additional information submitted on 16/12/2024:

- Great Crested Newt Conservation Plan, Trevor Basin, reference: 10054502-ARC-XX-XX-XX-GCN_CP, revision 01, dated July 2025, Arcadis

Section 1.1 of the GCN Conservation Plan states that GCN population size class assessment surveys in 2025 have confirmed a “medium population” and that during enhancement works carried out in 2025, 78 GCN were encountered and released to one of the purpose-built habitat piles next to the nearest pond of their capture.

In our previous response dated 15/01/2025 (reference CAS-270749-F5D0), following a review of the submitted Draft GCN European Protected Species Licence Method Statement, we advised that additional information should be provided in a GCN Conservation Plan which could be secured via a suitably worded condition. We note that a GCN Conservation Plan has now been submitted. We have reviewed this and advise that the following points should be addressed and submitted in an updated GCN Conservation Plan:

- Section 2.1 refers to the GCN Mitigation Guidelines, which have not been endorsed in Wales. We note that due to areas of hardstanding the Temporary Amphibian Fencing (TAF) will be surface fixed, but no information on the depth that the fence will be buried in areas of soft ground have been provided. We advise that the document is updated to include specification for areas of soft ground and that the fencing depth should be between 300mm and 350mm underground.
- Section 2.1 also states that the TAF will be inspected on a monthly basis. We advise that this is unsatisfactory and the TAF should be inspected every 24 hours and any required repairs completed within 48 hours.
- We note that Section 2.2 provides details regarding access being in line with the “site specific Construction Environmental Management Plan (CEMP)”. However, further information should be submitted to confirm whether the construction areas will be enclosed with amphibian fencing and any arrangements for vehicle crossings in the TAF. We advise that a grid system could be used to enable vehicle access across the fence lines.
- Insert 3 shows the location of the two Receptor Sites in relation to the Donor Site, we consider these to be satisfactory. However, the northern receptor site could be improved through extending its boundary to be contiguous with the Donor Site to ensure connectivity with on-site habitat is retained.
- Table 3, section 4.1 refers to population size targets which appear to be based on current conservation status (CCS) rather than using favourable conservation status (FCS) targets. We advise that legislative tests require demonstration of no detriment to the maintenance of FCS as opposed to CCS, so the population size targets should be based on this.
- Sections 4.3, 4.4 and Table 4, section 4.3.2 provide details on “Monitoring and Management Prescriptions” for the GCN Receptor Sites. We advise that insufficient details in respect of management prescriptions that will be carried out in the event of invasive non-native species or fish being recorded have been submitted. We also advise that insufficient information has been submitted regarding biosecurity measures in respect of chytrid. The wider landscaping scheme beyond the GCN Receptors and ecology areas should also consider these measures.
- Section 4.2.1 states that population monitoring will be carried out annually for years 1-5, biannually for years 6, 8 and 10 then every 5 years for years 15, 20 and 25. We do not consider this to be satisfactory and advise that monitoring is carried out

annually until year 20 and only after satisfactory review, biannually after year 20. In relation to survey methods, netting is not required and bottle trapping only considered necessary if pond conditions are unsuitable for torch surveys.

- Section 5.1 states that the Donor and Receptor sites are currently under the freehold ownership of Solutia UK Limited and that *“A Land Management Agreement (LMA) or equivalent legal mechanism is being prepared between Wrexham County Borough Council and Solutia UK Limited to secure long-term access and ensure the delivery of ecological mitigation, compensation, and monitoring measures set out within this conservation plan. This agreement will cover the full 25-year management period”*. We advise that the current submission is unsatisfactory in terms of tenure and ownership or occupancy should be with a body that accords with the definition of “responsible” under Part 7 of the Environment Act 2021.
- Section 5.3 states that *“regular ecological and maintenance visits (as detailed in Section 4.2 and Table 2) will ensure ongoing surveillance. These visits will include visual checks of site integrity and will be reported back to WCBC”*. We have concerns regarding the lack of detail regarding weekly/monthly wardening, site liaison and visitor management. Also, the reference to Table 2 appears incorrect and should be updated to the correct table.
- Section 5.2 states that all contractors involved in physical habitat works will be *“required to demonstrate relevant experience in ecologically sensitive land management and operate under method statements and instructions provided by WCBC”*. However, no details are given regarding licensing requirements for conservation management and site maintenance, so these should be provided.
- Section 2.4 provides some details regarding *“Additional GCN Avoidance and Mitigation Measures”*, however there is insufficient information regarding this component.
- Section 3.2.3 states that the SuDS ponds will be *“required to demonstrate relevant experience in ecologically sensitive land management and operate under method statements and instructions provided by WCBC”*. Therefore, we consider that the detailed design of these ponds should consider their functionality for GCN shelter, foraging and breeding. We note the proposed design is for the ponds to be predominantly dry. We therefore advise that their design be amended to include a sump in at least one of the ponds. We advise that management and maintenance prescriptions for the SuDS ponds consider GCN and that the management and maintenance works must be carried out under the provisions of the appropriate licence.
- We note that Section 5.5 states that the construction of the Donor Site is programmed to commence on 01/03/2026. Provided legal interests in the land issues are addressed, this date would appear appropriate for the commencement of installation of temporary amphibian fencing. However, based on a medium-sized population, amphibian clearance could take approximately 60 days so a more realistic construction start date may be 01/06/2026.

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.