Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-287515-B2Y6
Eich cyf/Your ref: P/2025/0143

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 23 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: DYMCHWEL ADEILEDDAU PRESENNOL A CHODI CYFLEUSTERAU CYFLOGAETH (DOSBARTH B2/B8) GYDA LLETY SWYDDFA ATEGOL (DOSBARTH B1A) GAN GYNNWYS TIRLUNIO, PARCIO, MYNEDIAD A GWAITH CYSYLLTIEDIG ARALL / DEMOLITION OF EXISTING STRUCTURES AND ERECTION OF EMPLOYMENT FACILITIES (CLASS B2/B8) WITH ANCILLARY OFFICE ACCOMMODATION (CLASS B1A) INCLUDING LANDSCAPING, PARKING, ACCESS AND OTHER ASSOCIATED WORKS

LLEOLIAD/LOCATION: LAND SOUTH OF BRYN LANE, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9US

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 02 September 2025.

Please note that this response is only in relation to the additional information provided (Ecological Impact Assessment and Land South of Bryn Lane, Bat Survey Technical Report, reference 10204.003 version 2 dated July 2025, The Environment Partnership Ltd.). There are other matters relating to protected species, contaminated land and protected sites in our previous response dated 26/06/2025 (reference CAS-281608-J6V1) 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.

We also advise that based on the information submitted to date, the document identified below should be included in the approved plans and documents condition on the decision notice.

Approved Document: Land South of Bryn Lane, Bat Survey Technical Report, reference 10204.003 version 2 dated July 2025, The Environment Partnership Ltd.

Without the inclusion of this document we would object to this planning application.

Protected Species

Great Crested Newts

Section 3.13 (page 22) of the previously submitted Ecological Impact Assessment (The Environment Partnership, Reference 10204.002, Version 5 dated January 2025) confirms GCN records within 100m of the application site and Section 3.15 (page 22) confirms the majority of GCN records are to the south and connected to the application site by a woodland corridor.

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

We have reviewed the following additional information submitted on 02/09/2025:

- Land South of Bryn Lane, Landscape and Ecological Management Plan, reference 10204.004 version 2 dated August 2025

In our previous response dated 26/06/2025 (reference CAS-281608-J6V1), following a review of the submitted Ecological Impact Assessment, 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 Landscape Ecological Management Plan (LEMP) has now been submitted which has addressed our concerns on the maintenance of landscaping onsite however, we advise that the following points should be addressed and submitted in a GCN Conservation Plan:

- Section 3.34 of the LEMP states "*GCN are not present on the Site; therefore, a GCN Conservation Plan detailing mitigation measures for the construction phase has not been produced*". The assessment of GCN fails to consider the presence of the species in the environs of the application site including the long-term compensation scheme located to south of the application site. We therefore continue to advise that GCN avoidance and mitigation measures as detailed in our previous response reference CAS-281608-J6V1 should be submitted.
- Details of habitat retention, enhancement and creation proposals associated with terrestrial and aquatic habitats. Details to include plans and timescales.
- The submission of a long-term site management plan (not less than 25 years) that includes:
    - details of habitats and ecological features present or to be created, both in written form and shown on appropriate drawings, including planting plans.
    - defined aims and objectives (including defined key performance indicators for long term monitoring indicators).
    - details of monitoring methodologies for habitat(s) and species.
    - contingency measures if fish or invasive non-native species (INNS) are detected.
    - current and any proposed changes to the freehold tenure of the compensation area (tenure of the ecology and heritage area to be approved by the Local Planning Authority).
    - persons or bodies responsible for undertaking management and surveillance together with required skills and competencies.
    - sufficient information regarding site liaison has been provided however, no details regarding site wardening have been provided and wardening.

    - The submitted plan fails to consider licensing and competency requirements regarding management and surveillance aims and objectives are unsatisfactory in respect of great crested newt. Further information should be submitted in respect of species-specific aims and objectives.
    - details of reporting, review and update of the plan (informed by monitoring) at specific intervals as agreed.
- The submission of detailed measures including plans designed to prevent the accidental capture/killing of GCN during operational phases of the scheme, including the installation and maintenance of an amphibian-friendly surface water management system that does not include gully pots (or other similar features).
- Details of timing, phasing and duration of construction activities and conservation measures.
- Post-construction monitoring and record dissemination for a period of not less than 25 years. Methodology shall include annual GCN abundance counts and Habitat Suitability Index (HSI) assessments. All ponds (including SuDS water bodies) to be added to the Wales GCN Monitoring Scheme, with individuals/bodies being identified as being responsible for monitoring and reporting works.

Bats

Section 3.9 of the previously submitted Bat Survey Technical Report (Land South of Bryn Lane, Reference 10204.003, Version 1.0 dated November 2024) confirmed no roosting bats were present during the nocturnal survey carried out on 05/11/2024, however Section 3.12 stated that there was moderate potential for hibernating bats and that "*hibernation surveys are currently being undertaken*".

We have reviewed the following additional information submitted on 02/09/2025:

- Land South of Bryn Lane, Bat Survey Technical Report, reference 10204.003 version 2 dated July 2025, The Environment Partnership Ltd.

We note that Sections 3.9 and 3.10 of the Bat Survey Technical Report (version 2 July 2025) confirms that no roosting bats were recorded using the site, however section 5 of the report recommends precautionary pre work checks to be carried out prior to demolition of the structure.

We consider that the above report provides an adequate basis upon which to consider the potential impacts of the scheme on bats and inform the decision-making process.

We consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range provided the measures set out in the submitted report are implemented.

Therefore, we advise that the following document is included in the approved list of plans / documents condition within the decision notice:

- Land South of Bryn Lane, Bat Survey Technical Report, reference 10204.003 version 2 dated July 2025, The Environment Partnership Ltd.

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.