Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-288993-W1Q7
Eich cyf/Your ref: P/2025/0560

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 02 October 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 additional information for the above, which we received on 23 September 2025.

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the document identified below is included in the approved plans and documents condition on the decision notice:

Approved Document: Non-Licensed Method Statement for Great Crested Newt and amphibians, Reference 1053519 / WNT69105-2354 (00), Version 1 dated 23/09/2025, RSK ADAS Ltd

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

Protected Species

We have reviewed the following information which has been submitted in support of the application:

- Non-Licensed Method Statement for Great Crested Newt and amphibians, Reference 1053519 / WNT69105-2354 (00), Version 1 dated 23/09/2025, RSK ADAS Ltd

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.

GCN and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981. Where GCN are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

i. The development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;
ii. There is no satisfactory alternative; and,
iii. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

To avoid developments with planning permission subsequently not being granted a licence, the Local Planning Authority should take Planning Policy Wales and Technical Advice Note 5 into account when considering development proposals where a European Protected Species is present.

Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the 3rd test “demonstration of no detriment to the maintenance of the favourable conservation status of European protected species”. We advise that before any consent is given, as informed by the provisions of Regulation 9 of the Conservation of Habitats and Species Regulations 2017 (as amended) the LPA satisfy itself as to whether the scheme satisfies the other two tests, namely a relevant Habitats Regulations purpose and whether there is no satisfactory alternative to the proposal.

We consider that the above report provides an adequate basis upon which to consider the potential impacts of the scheme on this species 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:

- Non-Licensed Method Statement for Great Crested Newt and amphibians, Reference 1053519 / WNT69105-2354 (00), Version 1 dated 23/09/2025, RSK ADAS Ltd

Protected Sites

We note the application site is within the catchment of the River Dee and Bala Lake 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, 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 and Bala Lake 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 NetRegs website .

If you have any queries about 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.