Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-289125-P5T3
Eich cyf/Your ref: P/2025/0431

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 07 October 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 25 September 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 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 updated information submitted in relation the proposed Strategic Ecology Corridor:

- Precautionary Working Method Statement, Strategic Ecology Corridor, Document reference 10944.004 Version 3.0 dated September 2025, The Environment Partnership Ltd
- GCN Conservation Plan, Strategic Ecology Corridor, Version Number 9134.026 V4, dated September 2025, The Environment Partnership Ltd

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

Strategic Ecology Corridor

We note 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 updated PWMS and advise that the following point is addressed and submitted in an updated PWMS:

- Section 2.15 has been updated to include reference to amphibian exclusion fencing in accordance with the specification provided in the Temporary Amphibian Fencing guidance “Drawing D9134.002)” which is included at the rear of the PWMS. However, the drawing D9134.002 (Figure TEP.ECO.001) dated 10/09/2025 shows the burial depth to be between 200-300mm, we consider this to be too shallow, and the fencing depth should be increased to between 300mm and 350mm depth underground.

- *GCN Conservation Plan*

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

- Section 1.69 states that the fencing will be buried in the ground to a depth of 300mm, we had advised that the depth should be increased to between 300-350mm, we therefore accept the depth of 300mm. Section 1.69 also states that “the anticipated specification for the vertical fence is provided in Annex 2”, we note that the specification drawing reference D9134.002 (Figure TEP.ECO.001) dated 10/09/2025 still shows a buried depth of 200-300m. We advise that the specification drawing should be updated to show a range of 300-350mm burial depth. We also note that page 24 refers to “Annex 2 - Specification for the one-way amphibian fence (TEP ref: TEP.FEN.016B)” which is different reference number in relation to the specification drawing in Annex 2, clarification on the correct reference number should be submitted.

- We note section 1.106 states that “Net World Sports will commission suitably qualified and experienced third parties to undertake the necessary monitoring and

management at the mitigation sites for at least 25 years". For the purposes of ensuring implementation of post translocation habitat management, monitoring and wardening, we wish to reiterate our advice that a body that accords with the definition of a responsible body under Part 7 of the Environment Act 2021 is also offered a lease (or licence) in respect of dedicated land for ecological purpose.

- Section 1.99 confirms that the GCN population monitoring surveys will be uploaded to the Welsh GCN Monitoring Scheme, however there is no reference to when the data will be uploaded. We advise that the monitoring section is amended to state that all data shall be uploaded by 30th September each year.

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.