Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-291563-H6S3
Eich cyf/Your ref: P/2025/0431

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 19 November 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 24 October 2025.

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

- GCN Conservation Plan, Strategic Ecology Corridor, Version Number 9134.026 V5, dated October 2025, The Environment Partnership Ltd
- Precautionary Working Method Statement, Strategic Ecology Corridor, Document reference 10944.004 Version 4.0 dated July 2025, The Environment Partnership Ltd
- Habitat Management Plan, Strategic Ecology Corridor – Land North of Francis Lane, reference 10934.003, version 3.0 dated May 2025, The Environment Partnership Ltd
- Habitat Management Plan, Strategic Ecology Corridor – Land adjacent to B5130, reference 10944.003, version 5.0 dated May 2025, The Environment Partnership Ltd
- Red Line Boundary/ Site Location Plan, reference 4826-Strategic Ecology Corridor-5, version 4 dated 19/05/2025, Nicholsons
- Great Crested Newt off-Site Mitigation Phasing Plan, drawing ref: G9134.042A, dated 18/07/2025, The Environment Partnership Ltd
- Parcel 1 Overview, Drawing ref: 4826 Strategic Ecology Corridor – 1.1, Revision V4 dated 19/05/2025, Nicholsons

- Parcel 2 Overview, Drawing ref: 4826 Strategic Ecology Corridor – 2.1, Revision V4 dated 19/05/2025, Nicholsons
- Parcel 3 Overview, Drawing ref: 4826 Strategic Ecology Corridor – 3.1, Revision V4 dated 19/05/2025, Nicholsons
- Parcel 4 Overview, Drawing ref: 4826 Strategic Ecology Corridor – 4.1, Revision V4 dated 19/05/2025, Nicholsons
- Great Crested Newt Fencing Plan, drawing ref: G10934.011.2, page 2 of 3, dated 19/09/2025, The Environment Partnership Ltd
- Great Crested Newt Fencing Plan, drawing ref: G10934.011.3, page 3 of 3, dated 19/09/2025, The Environment Partnership Ltd

Please note, without the inclusion of these documents 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:

- GCN Conservation Plan, Strategic Ecology Corridor, Version Number 9134.026 V5, dated October 2025, The Environment Partnership Ltd
- Precautionary Working Method Statement, Strategic Ecology Corridor, Document reference 10944.004 Version 4.0 dated July 2025, The Environment Partnership Ltd

We note the updates to both reports following the points raised in our previous letter dated 07/10/2025 (reference CAS-289125-P5T3) and consider the amended fencing specification and reference to uploading data to the GCN monitoring Scheme annually by the 30th September and consider these to be satisfactory.

We continue to advise that in the event of any future translocation of GCN to the ecology areas, the body responsible for the management of the ecology land should accord with the definition of a responsible body under Part 7 of the Environment Act 2021. Furthermore, any translocation of GCN within or to the Strategic Ecology Corridor will require a European Protected Species license.

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 tests set out in the Regulations. 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 advise that the works are carried out under licence. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Other ecology features

Wrexham Industrial Estate is considered to support a nationally important butterfly interest (including dingy and grizzled skipper). Dingy and grizzled skippers have previously been recorded in the vicinity of the site (Wrexham Industrial Estate, Towards a Living Landscape, North Wales Wildlife Trust).

The proposed scheme has potential to deliver enhancements by providing suitable grassland habitats for dingy and grizzled skipper, we advise you should discuss increasing the available habitat for this species with the Local Authority's ecologist, as this would provide a net benefit for dingy and grizzled skippers within these mitigation areas (which are species listed on Section 7 of the Environment (Wales) Act 2016).

Protected Sites

River Dee and Bala Lake Special Area of Conservation (SAC)

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.

Contaminated Land

This development is considered to pose low risk to controlled waters. Preliminary risk assessments show that the proposed development site has remained undeveloped agricultural land (even though a small section of the site is mapped within the wider ROF Wrexham site) and we therefore have no comments to make regarding land contamination.

Historic Landfill

According to our records the proposed development site is located approximately 215m from land that is, or has been, used for the deposition of waste material. We would therefore advise you to consult with the local authority's Environmental Health and Building Control Departments, as they may hold detailed records, and may wish to make appropriate recommendations in respect of landfill gas investigation/remedial work. The developers should be made aware of the existence of the landfill site so that they can decide whether or not to make their own investigations into the presence of landfill gas. It should also be noted that Waste Management Paper 27 states "It has been found that many sites which have taken only supposedly 'inert' waste have produced gas".

Development Affecting a Watercourse

The Lead Local Flood Authority (as cited in the Flood and Water Management Act 2010) is normally the appropriate body to provide advice on existing surface water flood risk and the management of surface water drainage from new developments.

Any works affecting an ordinary watercourse may require an Ordinary Watercourse Consent from Wrexham County Borough Council in their capacity of Lead Local Flood Authority.

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

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

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.