Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-292629-G1Y6
Eich cyf/Your ref: P/2025/0143

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 01 December 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 07 November 2025.

Please note that this response is only in relation to the additional information provided (Landscape and Ecological Management Plan Version 3.0 and GCN Conservation Plan Version 2). 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, a condition regarding biosecurity should be attached to any planning permission granted and 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 condition and 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 07/11/2025:

- Land South of Bryn Lane, Landscape and Ecological Management Plan, reference 10204.004 version 3.0 dated October 2025
- Land South of Bryn Lane, GCN Conservation Plan, reference 10204.005 V2 version 2 dated November 2025
- Soft Landscape Design, Drawing number 1059-01-NLD.151 Bryn Lane South, Revision V4 dated 26/11/2025

We note the submission of an updated Landscape and Ecological Management Plan (LEMP) and advise that the following points are addressed and submitted in an updated LEMP:

- Section 2.3 refers to site responsibility regarding the managing organisation and "necessary experience and certificates of competence", however there is no reference to European Protected Species (EPS) Licensing requirements in relation to management and maintenance provisions. The LEMP should be updated to include reference to obtaining the EPS License.
- Table 1 in section 2.16 details Key Performance Indicators (KPI's) and Monitoring however there are no defined GCN KPI's such as population number. We note that section 1.85 of the GCN Conservation Plan does provide this detail and advise that Table 1 is updated to include reference to section 1.85 of the GCN Conservation Plan.
- Habitats and Species of Principal Importance in England on page 10 should be updated to "Habitats and Species of Principal Importance in Wales".
- Section 3.32 states that common toads are listed as a species of principal importance under Section 41 of the NERC Act (2006), we advise that this section is updated to refer to common toads being listed as a species of principal importance under Section 7 of the Environment (Wales) Act 2016.
- Sections 4.90-4.115 regarding maintenance prescriptions for the Proposed Wildlife Pond do not include any reference to actions in the event of fish or INNS being detected in the pond. However, we note that sections 1.72-1.75 of the GCN Conservation Plan provide details, we therefore advise that the LEMP is updated to include the prescriptions in sections 1.72-1.75 of the GCN Conservation Plan for completeness.

- Section 5.11 states that “An appropriately qualified landscape consultant will formally re-assess the management plan”. We advise that the review is carried out by a licensed ecologist and that the LEMP is updated to reflect this.

In our most recent response dated 23/09/2025 (reference CAS-287515-B2Y6), we advised that additional information should be provided in a GCN Conservation Plan. We note that a GCN Conservation Plan has now been submitted and advise that the following points are addressed and submitted in an updated GCN Conservation Plan:

- Sections 1.8 and 1.85 refer to “on-site retention and enhancement scheme for GCN” and “on-site mitigation” respectively. The listed KPI’s include “a target population of at least 25 GCN per parcel”. Clarification should be submitted in relation to ‘per parcel’ as this would appear to relate to the separate off-site provisions under application reference P/2025/0431.
- Table 1 in Section 1.87 provides a timetable for construction works and mitigation creation, however there is no reference in the timetable to the corresponding off-site compensation being progressed under application reference P/2025/0431. Whilst these are separate applications, it should be noted that the off-site provision relating to this application (P/2025/0143) will need to be completed satisfactorily prior to any site works commencing at this application site.

We note that Section 1.59 states that “existing retained habitats within the southern and eastern boundaries have been identified as suitable receptor sites for GCN captured during the proposed works” and therefore our understanding is that there will be no translocation of GCN from the application site to off-site provisions. If this is not the case further information regarding any proposed off-site translocation of GCN should be submitted.

A number of paragraphs within the GCN Conservation Plan refer to the superseded version 2 of the LEMP. We advise that for the avoidance of doubt, the relevant references within the GCN conservation Plan are updated to the most current version of the LEMP.

Both the LEMP and GCN Conservation Plan make reference to the soft landscaping scheme and wildflower areas, proposed and retained areas of grass and scrub, aquatic planting, pond creation. We note that the drawing Soft Landscape Design (reference 1059-01-NLD.151 Bryn Lane South, Revision V4 dated 26/11/2025) includes these details, however we advise that the Soft Landscape Design drawing is amended to clearly show the on-site ecological area specific to GCN mitigation provisions.

We acknowledge sections 1.97-1.99 of the GCN Conservation Plan and the reference to a Case Study at Net World Sports Headquarters on Bryn Lane, however we do not wish to express specific comment on the submitted case study in relation to this current application.

Biosecurity

Sections 3.13-3.26 of the submitted LEMP discusses measures to be taken in relation to the confirmed presence of *Crassula Helmsii* on site. Whilst we note the provisions we advise that any consent includes the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

Condition: No development, including site clearance, shall commence until a Biosecurity Risk Assessment, and Method Statement that considers invasive non-native species and specific diseases (e.g. Chytrid) has been submitted to and approved in writing by the Local Planning Authority.
The risk assessment must include:

(i) appropriate measures to control any INNS on site;
(ii) measures or actions that aim to prevent INNS from being introduced to the site for the duration of construction and operational phases of the scheme.

The risk assessment shall consider landscaping and other related plans.

The Biosecurity Risk Assessment shall be carried out in accordance with the approved details.

Justification: To ensure that an approved Biosecurity Risk Assessment is implemented to secure measures to prevent or control the spread and effective management of any invasive non-native species and listed diseases at the site.

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.