Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-294856-T8B3
Eich cyf/Your ref: P/2025/0894

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 22 December 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CHANGE OF USE OF LAND TO SITE SHIPPING CONTAINERS TO FORM CONTAINERISED SELF STORAGE AND ASSOCIATED WORKS

LLEOLIAD/LOCATION: LAND OFF, BRIDGE ROAD SOUTH, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9SQ

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 05 December 2025.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:
Condition 1: European Protected Species

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

Protected Species

No ecological report has been submitted in support of this application. Section 2.1 of the Planning Statement states ‘The site contains no trees, watercourses, or ecological receptors to pre-empt ecological queries’.

However, the application site is within range of a known population of Great Crested Newts (GCN) and are therefore considered to be a material consideration.

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.

We note the retrospective nature of the application. We also note the application is for a temporary period of 3 years. We therefore advise the following condition in respect of GCN is included on any permission granted.

Condition: During operation a Great Crested Newt (GCN) plan of reasonable avoidance measures should be submitted to and approved in writing by the Local Planning Authority. The plan of reasonable avoidance measures should include, but not necessarily be limited to the submission of details and plans concerning GCN reasonable avoidance and mitigation measures including:

- fence design and maintenance (the erection of a one-way amphibian fence, throughout the duration of operations).
- fence design and maintenance (the erection of amphibian proof fencing throughout the duration of operations).
- proposals for the clearance of individuals from working areas.
- details of timing, phasing and delivery of reasonable avoidance measures.
- biosecurity measures.

The plan of reasonable avoidance measures shall be carried out in accordance with the approved details.

Justification: To ensure that GCN are protected by the development.

Protected Sites and Foul Drainage

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 (22 October 2025), 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 i.e. no foul drainage requirements, 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.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Pauline Gallagher Brown
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.