Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-295317-H4V9
Eich cyf/Your ref: P/2025/0886

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 23 January 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Codi Pont / Erection of Bridge

LLEOLIAD/LOCATION: Land Between F Lloyd Penley Ltd And Bedwell Park, Bridge Road South, Wrexham Industrial Estate, Wrexham, LL13 0TS

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 05 January 2026.

We 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 flood risk, fluvial geomorphology and protected species. If this information is not provided, we would object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes less vulnerable development – the construction of a bridge. The Flood Map for Planning identifies the application site to be at risk of flooding and partially within Flood Zone 3 (Rivers).

We refer you to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) for advice on how you should consider this application in line with current planning policy. Our role is to provide you with detailed advice on the findings and conclusions of the Flood Consequences Assessment (FCA) in relation to flooding from rivers and/or the sea, including the impact on flooding elsewhere. For advice on flood risk from surface water and or small watercourses you should consult with your Lead Local Flood Authority.

Therefore, we have reviewed the FCA undertaken by Shaw Stephens Consulting, dated Nov 2025, reference 0175-SSC-XX-XX-RP-C-001-P01. Our advice to you is that the FCA is incomplete. The advice in paragraph 10.24 of TAN15 is clear ‘In zones 2, 3 and TAN 15

defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused.'

Therefore, in accordance with paragraph 15.4, we advise you to use your powers to request the following information identified:

The bridge crossing over the River Clywedog has been constructed without planning permission or a Flood Risk Activity Permit. Its installation has altered both the floodplain and the main river channel by constricting the river corridor, with the potential to create backwater effects and redirect flows.

The submitted FCA relies on generalised flood mapping and does not provide site-specific hydraulic modelling to demonstrate the development is safe during the 1% annual probability event plus climate change and does not increase flood risk elsewhere.

Section 5.1.2 of the submitted FCA states "It is understood that a third party consultant is currently undertaking a flood modelling study of this watercourse with a view to subsequently advising on design flood risk levels at the bridge location" – this information has not been provided in support of the application.

The submitted drawings do not provide any details in terms of dimensions of the bridge crossing, soffit height or span. There is also no information provided regarding the width of the watercourse prior to the development or showing the upstream / downstream conditions for comparison.

Therefore, at present, insufficient information has been submitted to demonstrate that the bridge crossing is acceptable in flood risk terms, particularly in relation to third-party land and property with a known flooding history.

Should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow sufficient time for us to make further representations.

Please note, if an amended FCA is not submitted or any subsequent amended FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we are likely to object to the application.

Flood Risk Activity Permit

NRW has previously taken enforcement action under the Environmental Permitting (England and Wales) Regulations 2016, including the issue of a Remediation Notice on 14 March 2025 requiring cessation of unpermitted flood risk activities.

Retrospective Flood Risk Activity Permit (FRAP) cannot be issued to regularise works already undertaken, and any future permitting would be limited to mitigation and remediation proposals only.

We advise that the following information would be required to enable further consideration in relation any future FRAP application:

- Site-specific hydraulic modelling of the River Clywedog demonstrating no increase in flood risk, including climate change allowances.
- Detailed bridge design information in line with current industry guidance.
- Ecological and environmental assessments addressing habitat loss, protected species, and imported materials, all to be advised by other functions.

Development affecting a watercourse

Fluvial Geomorphology

During 2025 site visits were carried out by NRW staff and it was observed that the abutments of the bridge have narrowed the cross-sectional area of the river channel. Typically new bridge abutments are designed such that they span at least x1.3 the natural river channel width to minimise structural, geomorphological, hydrological and ecological impacts. The narrowing of this structure could not only throttle high flows and increase flood risk elsewhere, but it could also increase the energy within the channel to erode the downstream banks and scour of the bed of the river through the structure ("contraction scour"). This could essentially wash out much of the riverine habitat that would be otherwise present within the reach and unnaturally influence geomorphological processes for some distance.

No structural drawings or calculations have been submitted with the application. As such the applicant has not demonstrated that the bridge will not fail nor cause loss of land or riverine habitat within the reach.

We advise that the following additional information be submitted in support of this application:

- A description of the works and construction methodology including engineers structural drawings (showing foundations, deck structure, concrete types used etc)
- Engineers structural assessment to demonstrate whether the bridge built is suitable for the proposed use and loading (44 tonne HGVs were observed on site)
- Carry out and submit scour calculations in accordance with the industry guidance CS469 (published 2024 replacing BD97/12)
- Any scour calculated to be a result of the recent works should be assessed further (CFD/sediment modelling may be required) and mitigated in a sensitive manner that does not add to the degradation of the riverine environment (e.g. underpinning foundation, bioengineering erosion bankside protection measures)
- Details of materials used and any in-channel modification
- Information on the current surface-water drainage system serving the bridge approaches, the associated risk of contaminated runoff, and the measures incorporated to mitigate pollution during the operational phase.

Protected Species

We note there are records of great crested newts (GCN) and otters, both European Protected Species near to the site and therefore there is a reasonable likelihood of GCN and otters being impacted by the development.

GCN and otter 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.

No information about either species has been submitted with this application.

Planning Policy Wales (Edition 12) (PPW) determines that pre-emptive works should not take place in advance of a planning application submission (p151 section 6.4.16) outlines that: 'Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point'. PPW also states that 'in designing mitigation measures where uncertainty exists, applicants should follow the precautionary principle and assume a significant effect' (3b p150).

Therefore we advise that additional information is submitted to:

- An ecological survey covering the application site as well as the upstream and downstream sections of the Afon Clywedog, with specific attention to establishing the presence or likely presence of otters within the area and any impact on commuting otters.
- An assessment of the application site and its surrounding habitats in relation to the potential presence of GCN, including any requirement for further survey effort.
- Details of any tree felling undertaken, including an evaluation of potential impacts on bat roosting features and an assessment of any retained or removed trees that may support bat activity
- Details of any lighting associated with the operation of the bridge, including its location, specification, timing/controls, and an assessment of potential impacts on sensitive species such as bats and otters.
- Detais of proposed mitigation and/or compensation measures arising from the findings of the ecological surveys, along with justification and implementation details.

The ecological survey should be submitted along with measures to mitigate or compensate the impacts prior to determination of the scheme to inform the decision-making process.

The submission should demonstrate that the proposed development would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

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,

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.