Matthew Phillips

From: Clover Long <clover.long@lichfields.uk>
Sent: 12 November 2025 10:14
To: Dafydd Thomas
Cc: Simon Pemberton; Matthew Phillips
Subject: RE: Llay (ref. P/2024/1675) - Ecological Mitigation Strategy [LICH-DMS.FID440214]
Attachments: 13361-AEW-SI-XX-DR-A-0502-P11-Ecological Mitigation Plan.pdf

Hi Dafydd,

Hope you are well.

Our team have reviewed the updated response provided from Natural Resources Wales [NRW]. Our ecological consultant has prepared a response below that addresses the points raised.

NRW response

The applicant fully acknowledges the presence of Great Crested Newts [GCN] locally to the site and has sought to incorporate GCN habitat into the proposed scheme layout as a result. The illustrative plans show the incorporated of habitat to include new breeding ponds for GCN, new hibernacula (no such features are currently present) and a grassland area to be managed for sheltering, foraging and dispersing GCN (and other biodiversity interest).

The site is currently under agricultural land-use and would continue to be used in this way unless planning consent is granted for the site's redevelopment for employment uses. The biodiversity value of the existing agricultural land is low and is unregulated in terms of impacts on GCN and other notable species. The proposed development of the site provides an opportunity to secure and safeguard a significant portion of this land, under the regulation of the Local Authority and in consultation with NRW. With this in mind, the applicant has sought to address NRW's comments by increasing the percentage area of land allocated for biodiversity and ecological mitigation from 27.91% to 30.15%. The plan attached has been updated accordingly.

NRW's concerns relating to incidental capture/harm from surface water drainage design are acknowledged. The applicant intends to prepare a detailed surface water drainage scheme that includes measures such as dropped or recessed kerbs, carefully located to minimise the risks to GCN, as part of a future reserved matters application. NRW would be a consultee on this application and therefore this scheme would then need to be approved by NRW.

The applicant also acknowledges the need for further detail to be provided with regards to the proposed on-site compensation area. However, given this is an outline application (with all matters (including landscaping) reserved), it is proposed that the detailed GCN Conservation Plan referred to by NRW be delivered as part of any subsequent Reserved Matters Application. We note that NRW find the information submitted to date to "provide an adequate basis upon which to consider potential impacts of the scheme on GCN". We therefore consider there is sufficient and appropriate information provided to date regarding ecological matters for the outline application to be approved. Further ecological detail can be provided with a reserved matters application, when we are seeking approval for the detailed layout, landscaping scheme and drainage scheme on the site.

Clearly, the scheme will deliver genuine long-term benefits for both biodiversity and the local economy, by redeveloping a currently under-utilised agricultural site for employment uses. These benefits weigh heavily in the planning balance. We are therefore seeking agreement from the LPA that they are happy to progress to a positive determination on the basis of the information provided.

We also wanted to address NRW's comments stating that "the proposed development could potentially lead to an increase of phosphorus load from the receiving wastewater treatment works into the River Dee and Bala Lake Special Area of Conservation". We addressed this point in our planning submission. Clearly, the

site is currently in agricultural use. Therefore, the loss of agricultural land will deliver an improvement to the levels of phosphorus associated with the site and potentially flowing into the SAC. Additionally, given the scale and location of the employment development proposed, it is anticipated that almost all employees at the development will be local, either within Wrexham or the immediate surroundings. As such they are already residents in the locality and the associated discharges are already accounted for in the catchment. The proposals will not give rise to additional discharges compared to the existing situation. It is therefore considered that the scheme will not create an adverse effect on the designated SAC in and around the River Dee.

Welsh Water raised no objection to the proposals. Welsh Water's Pre-Planning Enquiry and consultation responses confirm that there is surface water capacity and that the foul can be managed within the Gresford Waste Water Treatment Works [WwTW] as it has a phosphate consent (subject to a proposed condition). The condition proposed by Welsh Water required the development not to be occupied until 31st December 2025 or until such time as the local planning authority have received written confirmation from Dwr Cymru Welsh Water, whichever is sooner, that the upgrading of Gresford Waste Water Treatment Works has been completed and is compliant with permit condition and that they are able to accommodate the foul flows from the development.

Given that 31st December 2025 is fast approaching, it is considered that the foul flows from the future occupation of the development can be accommodated within the WwTW.

Therefore, we do not consider that NRW's comments are valid in light of the comments from Welsh Water and the nature of the proposals, which will not increase the phosphorus loads in the SAC. Instead the proposals should only improve the baseline position.

We would therefore be grateful if you could confirm that the LPA accepts our justification provided and is happy to progress through to determination on this basis.

Are you able to please follow up with your highways department regarding their outstanding comments to the updated Highways Technical Note shared with you in mid-August?

Kind regards,
Clover

Clover Long
Senior Planner
BSc (Hons) MSc MRTPI
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
T 0161 837 6130 / M 07880382318
E clover.long@lichfields.uk

Lichfields.uk

This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible.
Nathaniel Lichfield & Partners Limited (trading as "Lichfields") is registered in England, no. 2778116, registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG.

From: Dafydd Thomas <Dafydd.Thomas@wrexham.gov.uk>
Sent: 29 July 2025 09:59
To: Clover Long <clover.long@lichfields.uk>
Cc: Simon Pemberton <simon.pemberton@lichfields.uk>; Matthew Phillips <Matthew.Phillips@wrexham.gov.uk>
Subject: RE: Llay (ref. P/2024/1675) - Ecological Mitigation Strategy [LICH-DMS.FID440214]

CAUTION: This email originated from an external source.
Hi Clover,

I am well thank you, hope you are likewise.

I confirm receipt of the below and the attachment – this will be published online with consultees re-consulted.

Kind regards,

Dafydd

Dafydd Thomas MRTPI
Uwch Swyddog Cynllunio / Senior Planning Officer – Development Management
Economi a Chynllunio/Economy and Planning

01978 298777
Cyngor Bwrdeistref Sirol Wrecsam, Neuadd y Dref, Wrecsam, LL11 1AY
Wrexham County Borough Council, Guildhall, Wrexham, LL11 1AY
wrexham.gov.uk | wrecsam.gov.uk
twitter.com/wrexhamcbc | twitter.com/cbswrecsam
facebook.com/wrexhamcouncil | facebook.com/cyngorwrecsam

Cymraeg
Ysgrifennwch ataf yn Gym
Please write to me in Wel

From: Clover Long <clover.long@lichfields.uk>
Sent: 23 July 2025 18:32
To: Dafydd Thomas <Dafydd.Thomas@wrexham.gov.uk>
Cc: Simon Pemberton <simon.pemberton@lichfields.uk>; Matthew Phillips <Matthew.Phillips@wrexham.gov.uk>
Subject: Llay (ref. P/2024/1675) - Ecological Mitigation Strategy [LICH-DMS.FID440214]

Hi Dafydd,

Hope you are well.

Our ecologist on the scheme has been trying to engage with NRW and the Council's ecology officer to agree a strategy in light of the formal comments received by NRW to the application. To seek to move the matter forward, our ecologist has prepared an Ecological Mitigation Strategy that assumes a worst-case scenario in terms of species present on the site rather than what has been identified on the ground.

We would be grateful if the attached strategy could please be attached to the planning file and consulted on. We look forward to receiving a meaningful response from the relevant consultees at the earliest opportunity.

Kind regards,
Clover

Clover Long
Senior Planner
BSc (Hons) MSc MRTPI
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
T 0161 837 6130 / M 07880382318
E clover.long@lichfields.uk

Lichfields.uk



This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible.
Nathaniel Lichfield & Partners Limited (trading as "Lichfields") is registered in England, no. 2778116, registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG.

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

Ewch i weld - mi fedrwch chi dalu, rhoi gwybod, gwneud cais, dweud eich dweud, a dod o hyd i wybodaeth ar-lein yn www.wrecsam.gov.uk. Arbedwch bapur - meddyliwch cyn argraffu!

Mae'r neges e-bost hon ac unrhyw atodiadau wedi eu bwriadu ar gyfer yr unigolyn neu'r sefydliad y'i cyfeirir atynt yn unig. Am yr amodau llawn ynglŷn â chynnwys a defnyddio'r neges e-bost hon, ac unrhyw atodiadau, cyfeiriwch at www.wrecsam.gov.uk/top_navigation/disclaimersw.htm

We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

Take a look - you can pay, report, request, have your say and find information online at www.wrexham.gov.uk. Save paper - think before you print!

This e-mail message and any attachments are intended solely for the individual or organisation to whom it is addressed. For full conditions in relation to content and use of this e-mail message and any attachments, please refer to www.wrexham.gov.uk/top_navigation/disclaimers.htm