

CONSULTATION RESPONSE LETTER

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Land North of Bryn Lane, Wrexham Industrial Estate – Response to NRW Consultation Letter dated 19th February 2026 (NRW Ref: CAS-299921-J0C3)

- 1.1 This letter has been written to address comments concerning Great Crested Newts (GCN) provided by NRW in the Consultation Letter dated 19th February 2026 (NRW Ref: CAS-299921-J0C3).
- 1.2 This letter provides a response to the points raised in the sections of the NRW letter titled 'Response to NRW Letter' and 'Temporary fencing ref D9134.002 (Figure TEP.ECO.001) dated 10/09/2025'. It also describes the changes made to two documents to address the latest NRW feedback:
- 9134.025 EPS Development Licence Method Statement, Version 5.0, dated 18/11/2025
 - 9134.05.001 Habitat Management Plan (NRW – GCN), Version 8.0, dated 20/11/2025
- 1.3 The table below provides a full list of NRW comments under sections 'Response to NRW Letter' and 'Temporary fencing ref D9134.002 (Figure TEP.ECO.001) dated 10/09/2025', and the associated TEP Response.

Table 1: TEP Response to NRW Comments (NRW Ref: CAS-299921-J0C3)

NRW Comment	TEP Response
As stated in our response dated 07/11/2025 (CAS-289100-P7C1), we continue to have concerns the existing proposed on-site corridor is too narrow and again, advise a wider width is considered.	There are no definitive prescribed widths for wildlife corridors. In summary: along the northern boundary the corridors are c. 20m wide on average, and the eastern landscaping corridor is c. 25m wide on average. The proposed landscaping area and bund to the north-west of the site is c. 50m wide. The proposed central north-south ecology corridor which runs through the site is c. 38m wide. These widths are considered adequate for GCN to move through the site.
Furthermore, we are concerned that the multifunctional use of the on-site corridor may hinder effective management and compromise the ability to deliver positive outcomes for both great crested newts (GCN) and other land uses.	As stated in Section F of the EPS Method Statement, the site will be managed by Net World Sports and their assigned qualified licensed consultants. The management and surveillance of the ecological areas for GCN will be secured under a S106 commitment.

Our preferred approach remains the provision of a wider corridor on-site. However, without prejudice, we would be prepared to accept the current proposal strictly on the proviso that the off-site ecology land is occupied and subject to long-term management, monitoring and wardening, by a body that accords with the definition of a 'responsible body' under Part 7 of the Environment Act 2021.	All Ponds, within the Phase 1 development site, Future Phases and, Receptor area and within 250m of the site boundary will be surveyed annually to determine presence and population sizes of GCN. As new ponds are created, these will be included in the surveys. Surveys will be undertaken by licenced ecologists throughout the development period and for a minimum of 25 years post completion of all parts of the site. Surveys will be undertaken using torchlit surveys and additional methods where required, eDNA will be used to support these surveys if the season allows. These will be discussed with NRW. If monitoring results are unfavourable, the Habitat Management Plan (9134.05.001 V9) will be revisited to identify areas where further management or habitat creation could encourage greater use of the site by GCN. The HMP should be reviewed yearly making sure that the sites are managed correctly against prescriptions and timescales identified in the plan. The above safeguarding measures, including the use of fencing and signage, as secured with a S106 commitment, are considered adequate to deliver positive outcomes for GCN within the on-site corridor. There are no definitive prescribed widths for wildlife corridors and the proposed widths are considered adequate for GCN to move through the site.
Failure to action this advice may mean that relevant future licence applications are not capable of demonstrating no detriment to the maintenance of the favourable conservation status of GCN in its natural range. This outstanding issue is material to the determination of any approval in respect of this specific application, in our view.	Please refer to responses above.
We advise that consideration is given to including Bryn Lane in the roads referred to in section E.3.3.2 of the European Protected Species (EPS) Development Licence Method Statement, regarding the construction of amphibian tunnels. An additional tunnel could likely improve connectivity between this application site and a further proposed development by the same applicant, south of Bryn Lane under reference P/2025/0143. This aspect should be discussed with your Authority's ecologist, and is an approach that we would support.	As the land adjacent to Bryn Lane falls outside of the applicant's ownership, this has not been taken forward. No evidence of connectivity the land north and south of Bryn Lane has been observed. Currently GCN have not been recorded in the land south of Bryn Lane.
Ref. 2 in Table 1 states that "Whilst Wrexham Industrial Estate may support a nationally important population of GCN the proposed development site is separated from it and therefore unlikely to support a nationally important population". We disagree with this statement and continue to advise that Wrexham Industrial Estate and its environs supports a nationally important population of GCN and therefore advise that any impacts should not be considered as local.	The EPS Method Statement assumes a large GCN population is present on site and is nationally important.

We note that the corresponding off-site compensation for this application is being progressed under a separate planning application (P/2025/0431), we therefore advise that your Authority secures its delivery to your satisfaction either through a 'Grampian' style condition or legal agreement.	No comment.
We note that the specification drawing included within Annexe K.2 of the EPS Development Licence Method Statement has been updated to show a buried depth of 300-350mm. However, the separate specification drawing on the LPA portal, reference D9134.002 (Figure TEP.ECO.001) dated 10/09/2025 shows a buried depth of 200-300m. As advised in our previous response, we consider this to be too shallow, and that the fencing depth should be increased to between 300mm and 350mm depth underground on all relevant specification drawings.	The corrected drawing is now appended to all reports. The drawing on the LPA portal is incorrect.

- 1.4 To assist with further review of the amended documents, a full list of NRW comments and the paragraph numbers within the above documents which address each of these is provided in the tables below:

Table 2: EPS Development Licence Method Statement amendments

NRW Comment	Relevant paragraph(s) within amended document
We advise that an over-arching strategy and approach to licensing the various Net World Sports developments at Wrexham Industrial Estate is considered. We would advocate that a new licence application is submitted that includes all land in plan number G9134.42A where planning consents have been approved and any ecological reserved conditions discharged. Each new planning application will need to request the revocation (relinquishment) of any previous extant licence and all conditions and obligations required under the extant licence transferred to the new licence amendment.	This change has not been made at this stage but may be considered after approval of the planning application
Sections A5 and B.1.13 refer to "Conservation of Habitats and Species Regulations 2010", these sections should be updated to refer to the "Conservation of Habitats and Species Regulations 2017 (as amended)".	Paragraphs A.5 and B.1.13
Section A.2 states the development area is approximately 37.21ha whereas section E.3.2.2 states that the total development area is 36.35ha. Clarification on the hectareage should be provided.	Paragraphs A.2 and E.3.2.1
Section C.6.2 contains details regarding surveys carried out and references to 'Pond ID' which does not correlate with national databases. We advise that the pond identification codes are updated to correctly correspond with the referencing system used by Cofnod / Wales GCN monitoring scheme for accurate and consistent cross referencing.	This change has not been made.

The document list under section E.2.4.1 should be updated with dates and version numbers of drawings and plans included/referenced within the EPS Development Licence Method Statement. The list should also be updated to include the GCN specific provisions referenced above once available.	Paragraph E.2.4.1
In relation to section F, in our view different approaches regarding tenure will be required in respect of on-site and off-site land. The rationale for this is that the onsite scheme is multifunctional whereas the offsite areas are for nature conservation purpose only. As previously advised, the long-term occupier(s) of the off-site ecology areas will need to accord with the definition of a responsible body under Part 7 of the Environment Act 2021. This body must be appointed and occupying one or more of the off-site ecology areas before the commencement of the operational phase of the proposals.	This change has not been made.
The long-term funding will need to be confirmed within the provisions of any future licence application. We note and concur with the approach described in section F.1.3 that estate management charges will be levied on all future occupiers to provide long-term site management, monitoring and wardening throughout the operational phase of the proposals.	No change required.
Section F.2 - in line with comments regarding section 4.2 of the HMP below, we advise that owing to the importance of the Wrexham Industrial Estate GCN population, 25 years is too short a duration, therefore surveillance will be necessary for a duration of a minimum 25-year management period.	Paragraph F.2.1.
We note the timetable of works in section G and advise that the following additional activity is included within the table: Transfer of occupancy of one or more ecology areas before commencement of the operational phase of the proposals	This change has not been made.
We note that section H.2.1 states "All land used for GCN mitigation will remain under the ownership and management of the developer Net World post completion. An appropriate ecological consultant with GCN licences will be employed to support the developer owner". We continue to advise that the occupancy of off-site ecology areas is transferred to a body that accords with the definition of a responsible body under part 7 of the Environment Act 2021. Furthermore, our comments only relate to the detail of this specific development as opposed to being applicable to any other land including proposed offsite compensation (receptor) areas	This change has not been made.

Annex K.2 contains the drawing 'Great Crested Newt Survey Results' reference G9134.034A. The drawing shows an area highlighted as the "Application Boundary", however this does not match the red-line application boundary for this application P/2023/0497. We advise that the drawing is updated to reflect the correct red-line application boundary.	Paragraphs C.6.1, C.6.2, E.2.4.1 and Annex K.2
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Table 3: Habitat Management Plan amendments

NRW Comment	Relevant paragraph(s) within amended document
Section 2.11 outlines the management objectives including "To implement the HMP for a period of 25 years to ensure habitats are managed and maintained accordingly". We advise that the wording is amended to state "for a minimum of 25 years".	Paragraphs 2.11 and 4.2
Sections 3.68 (Amenity Grass), 3.73 (Wildflower Meadow, Wildflower and Shady Grass) and 3.83 (Wetland and Pond Edge Mix) all state that "Any bare ground will be cultivated and re-seeded as required to successfully establish sward. This will be carried out twice annually between August and October". We advise against the inclusion or implementation of 'cultivation' of bare ground, which in our view is an avoidable activity. Our advice considers the subterranean nature of GCN.	Paragraphs 3.68, 3.73, 3.83 and 3.105
Section 4.2 states that the Post Construction Monitoring Plan will be implemented on-site for the duration of the 25-year management period. We advise that owing to the importance of the Wrexham Industrial Estate GCN population, the text should be amended to "be implemented on-site for the duration of a minimum 25-year management period". We would also welcome reference to Section 2.11 and the GCN population targets in this section.	Paragraphs 2.11 and 4.2
Table 4 provides the key measures for Site Monitoring. Whilst we note the inclusion of "Hibernacula" in the table, we advise that further monitoring targets regarding GCN habitat management (terrestrial and aquatic) are included within the table to ensure ecological provisions are also considered in the Site Monitoring	Table 4

Yours sincerely



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