Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-300489-F5C5
Eich cyf/Your ref: P/2026/0054

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 13 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Installation of two 132kv circuits, two fibre cables and two cable sealing end platforms

LLEOLIAD/LOCATION: Kronospan Ltd, Holyhead Road, Chirk, Wrexham, LL14 5NT

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 11 February 2026.

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: Construction Environmental Management Plan

We also advise that based on the information submitted to date, the document identified below should be included in the approved plans and documents condition on the decision notice.

Approved Documents:

- Ecological Impact Assessment Report, reference: P_Ax_04_EcIA_Rev03, dated 14/01/2026, Ecology Consulting Ltd
- Information to Inform a Habitats Regulations Assessment, reference: P_Ax_04_R_Kronospan 132kV_HRA dated 14/01/2026, Ecology Consulting Ltd

Without the inclusion of this condition and document we would object to this planning application.

Protected Species

We have reviewed the following information which has been submitted in support of the application:

- Ecological Impact Assessment Report, reference: P_Ax_04_EcIA_Rev03, dated 14th January 2026, Ecology Consulting Ltd
- Framework Construction Environmental Management Plan, reference 5185-01-01 Rev 1 dated January 2026, AXIS P.E.D. Ltd

We note that the Ecological Impact Assessment (EcIA) has identified that the application site has the potential to support a bat roost.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats 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 tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

We consider that the EcIA (reference: P_Ax_04_EcIA_Rev03, dated 14th January 2026, Ecology Consulting Ltd.) provides an adequate basis upon which to consider the potential impacts of the scheme on this species and inform the decision-making process.

We advise that the report is included in the approved list of plans/documents condition within the decision notice.

Notwithstanding this, we also advise that further information is required to manage the potential impacts of the scheme in respect of potential disturbance through tree felling. However, we would be content for this further information to be provided via a suitably worded condition.

Trees within and adjacent to the works area were assessed for bat roosting potential, and any potential roost feature (PRF) bearing trees were subject to detailed climbing inspections. Tree (TN25) was initially assessed as medium PRF but was downgraded to low PRF following climbing survey, additional low PRF trees were also identified along Colt Lane and south of Pont-y-Blew Road. Section 3.3.3 of the EcIA confirms that following the tree climbing surveys during July-September 2025 and also December 2025-January 2026, no roosting bats or evidence of roosting bats was found.

Section 6 of the EcIA states that PRF-I trees requiring removal "should be soft-felled under a precautionary working method statement under the supervision of a licenced ecologist". We also note that section 3.8.8 of the Framework Construction Environmental Management Plan (CEMP) refers to soft felling under a precautionary working method statement.

Where any PRF-M trees are to be removed or subject to works, we advise that a pre-construction inspection by a suitably qualified ecologist is also undertaken to confirm that bats remain absent at the time of works. This can be secured through an updated CEMP.

We therefore advise the following condition in respect of bats is included on any permission granted:

Condition: No development including site clearance shall commence until an updated Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Justification**:** A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction.

Protected Sites

Special Area of Conservation (SAC)

The application is located within 15m from the River Dee and Bala Lake Special Area of Conservation (SAC).

We have concerns that a likely significant effect from the proposed development on the SAC cannot be ruled out through disturbance to otters (a feature of the SAC) and pollution during the construction phase

To secure appropriate mitigation measures, we advise that an updated CEMP is secured through condition set out in the Protected Species section above should be attached to any planning permission for this development. Provided the development is carried out in accordance with that condition, we do not consider that it will adversely affect the integrity of the SAC site.

- Otter

The proposed development site lies approximately 25m from the River Ceiriog, which forms part of the River Dee and Bala Lake (SAC), for which otter is a qualifying feature.

Multiple records of otter are present along this stretch of river adjacent to the eastern boundary of the site. Survey work undertaken in 2026 identified otter footprints within the survey area, as well as a feature with potential to function as an otter holt.

We welcome the submitted CEMP and the provisions it includes for a pre-construction otter survey at the eastern boundary, alongside the working practices set out in Sections 3.8.12 – 3.8.15. We advise that an updated CEMP is submitted to specify that works occurring along the north-eastern boundary of the development and adjacent to the River Ceiriog will adhere to the following measure:

- no works will take place between one hour before dusk and one hour after dawn.

We note the lighting measures included in Sections 3.8.12 – 3.8.15 of the CEMP and are satisfied, given the above working-hours parameter, that no night-time lighting will be utilised in proximity to the SAC.

On inclusion of the above, and on the basis that any confirmed holts will be subject to a 50m exclusion zone where no work will take place, we have no further comments in respect of otter. We advise that the above information is submitted in an updated CEMP secured through condition as detailed in the Protected Species section above.

- Pollution Prevention

We note that the updated EcIA and Framework CEMP have identified avoidance and mitigation measures for surface water run off/pollution control and refer to standard good practice measures. We concur with this approach and that the measures described can be secured through the inclusion of the EcIA and updated CEMP in the approved list of plans/documents condition within the decision notice.

A 'shadow HRA' (Information to Inform a Habitats Regulations Assessment, reference: P_Ax_04_R_Kronospan 132kV_HRA dated 14/01/2026, Ecology Consulting Ltd) has also been submitted and section 4.6 identifies "the following potential likely significant effects on the River Dee and Bala Lake SAC that could occur in the absence of mitigation:

- Disturbance of River Dee and Bala Lake SAC qualifying species (otter) during construction of the Proposed Development, specifically:
    - Disturbance of otters caused by lighting used during construction.
    - Disturbance of otters from noise generated during construction.
- Surface water runoff and pollution events during construction.

The 'shadow HRA' includes mitigation measures regarding disturbance through noise and lighting in respect of otters in addition to potential pollution impacts with cross referencing to the project CEMP. We have no concerns to raise in relation to the 'shadow HRA'. Provided the measures set out in the above named documents are implemented as prescribed, we consider that the proposed development would not adversely affect the integrity of the SAC.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), your authority must, before deciding to give consent for a project which is likely to have a significant effect on a SAC site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC site.

<u>Site of Scientific Interest (SSSI)</u>

We have considered the information submitted in support of the above application. Based on the information submitted, we consider that the proposed development is not likely to damage the features for which Chirk Castle and Parkland SSSI is of special interest.

Ground Water Quality

We have reviewed the application documents in relation to land (soil) quality (contaminated land, landfills etc.), controlled waters, with focus on groundwater, and pollution prevention during construction/installation of the power transmission infrastructure.

We note that the Ground Investigation report (Ian Farmer Associates, reference 2231512 dated September 2025) is primarily a geotechnical report and is not focused on the identification of potential contamination and related risks with only a small number of investigation borings/boreholes used across the application site. The proposed cable installations are on land owned by third parties, including Wrexham County Borough Council (WCBC), proposed to be installed at shallow depths above groundwater (based on current evidence), and for the most part along existing roads, therefore we would not expect the ground investigation to focus on identifying subsurface contamination unless there was specific evidence for existing contamination.

The proposals for monitoring groundworks, including drilling, and pollution prevention and response to potential pollution incidents are appropriate. This information is provided in several documents, and summarised in the Framework CEMP.

Flood Risk

The planning application proposes less vulnerable development Installation of two 132kV cables and two fibre cables in addition to temporary construction compounds. The Flood Map for Planning identifies part of the application site to be at risk of flooding within Flood Zone 3 (Rivers Sea).

The area shown to be at risk of flooding is the existing farmyard at Afon Bradley Farm, which is shown on the drawing “Main Construction Compound 1 – Afon Bradley Farm, Appendix K” to be used as a construction compound area for the proposal. Therefore, there is already a low vulnerability use associated with the proposed compound area.

We note that Appendix G of the Pre-Application Consultation Report (PAC Report, reference 5185-01-PAC revision 2 dated January 2026) states: “*An assessment would be undertaken to identify the most appropriate storage locations, considering flood risk zones and ground conditions to minimise disruption, prevent damage to stored materials and avoid any potential environmental impact (such as a diesel bowser in a flood risk area). The Framework CEMP has been updated to include reference to the above.*”

Given the scale and or nature of the proposed development (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and consequences. We would also expect the developer to take the opportunity to incorporate flood resilient design where feasible.

Guidance on resilient design can be found in Chapter 13 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025, which references advice from Construction Industry Research and Information Association, including a Code of Practice and Guidance for Property Flood Resilience.

We provide advice on our website Natural Resources Wales/Preparing for a flood which may be useful for the developer or occupant of the proposal.

Designated Landscape

Our comments concern the development’s potential impacts on the landscape character and visual amenity of the Clwydian Range and Dee Valley National Landscape (CRDV NL) and the proposed Glyndŵr National Park (NP) and the statutory purpose to conserve and

enhance natural beauty. Our advice below in relation to the proposed Landscape and Visual Impact Assessment (LVIA) approach and scope within Scoping Report pertains solely to our remit on National Landscape (NL) designations.

The CRDVNL and Glyndŵr NP follow largely the same boundary within the vicinity of the proposed development with a slight protrusion of the proposed Glyndŵr NP designation area to the southwest of the proposed development. The Proposed development is located approximately 400m from the CRDV NL and the proposed Glyndŵr NP. Considering the type of development of largely underground cabling and associated infrastructure located outside of the NL designations within a built-up developed context of urban areas and roads no significant effects on the NL are likely.

The PAC report refers to updates to the Framework CEMP and Ecological Impact Assessment in respect of minimising tree and hedge vegetation removal, implementation of replacement planting and selection of tree and hedge planting to be of 'local suitability' in response to the general advice provided in our response to the Statutory Pre Application Consultation dated 18/12/2025 (reference CAS-293565-K2F4). We concur with the approach proposed.

We also note the rationale provided in the PAC Report in response to our general advice for screening planting 'where possible' and acknowledge that tree planting could introduce constraints on essential access and maintenance for both the existing pylons and the proposed CSE platforms.

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.