Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-302155-M7W6
Eich cyf/Your ref: P/2026/0098

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 19 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Construction of new path and associated landscaping

LLEOLIAD/LOCATION: Chirk Castle, Chirk, Wrexham, LL14 5AE

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 02 March 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 protected sites. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Sites

Site of Special Scientific Interest (SSSI)

The red line boundary of the application site is located within the Chirk Castle and Parkland SSSI which is designated for ancient wood pasture and parkland, saproxylic invertebrate species and breeding roost of lesser horseshoe bats.

The decision as to whether the proposed development's location within a SSSI is justified, is entirely a matter for your Authority, having followed the step-wise approach in Planning Policy Wales (PPW). Our advice provided below focuses on the likelihood and significance of impacts on the notified features of the SSSI from the proposed development.

We have concerns that inadequate information has been submitted to demonstrate that the proposed development will not damage the notified features of the Chirk Castle and Parkland SSSI.

Paragraph 6.4.26 of PPW (edition 12) states that *"proposals must be carefully assessed to ensure that effects on those nature conservation interests which the designation is*

intended to protect are clearly understood and development should be refused where there are adverse impacts on the features for which a site has been designated".

We consider that the development is likely to damage the notified features of the Chirk Castle and Parkland SSSI. We have concerns that during the construction and operational phases, the proposals could cause disturbance to lesser horseshoe bats, a notified feature of the SSSI, particularly during the maternity season.

Construction activities involving vibration and noise and additional lighting can all cause disturbance whilst operationally, the installation of lighting can also have an impact.

We therefore advise that the following further information should be submitted in support of the application, this could be in the form of a Reasonable Avoidance Measures documents:

- Details regarding timing of the works ie time of year and length of time on anticipated for site works.
- Details regarding working hours – confirmation that all works will be carried out during daylight hours.
- Details regarding any proposed lighting associated either with the construction phase or operationally.

In the absence of this information, we cannot rule out damage to the notified features of the SSSI, from the proposed development. We therefore recommend that planning permission should only be granted if additional information is provided which demonstrates that the proposed development will not damage the notified features of the SSSI.

Ultimately, the decision as to whether the proposed development should proceed is entirely a matter for your Authority, having followed the step-wise approach in PPW. Our advice above focuses on the likelihood and significance of impacts on the notified features of the SSSI from the proposed development.

Should you be minded to grant planning permission in the absence of this additional information, we ask that you notify us under the provisions contained in Section 28I of the Wildlife and Countryside Act 1981 (as amended). We also direct you to paragraph 6.4.28 of PPW (edition 12) which states that if you are minded to grant planning permission against our advice, then you must notify Welsh Ministers.

River Dee and Bala Lake Special Area of Conservation (SAC)

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, 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, 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.

Protected Species

Lesser horseshoe bats are known to use Chirk Castle as a roost site and as noted above, are a feature of the Chirk Castle and Parkland SSSI. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

We have concerns about the proposal and advise that further information regarding construction methods and lighting, as detailed in our Protected Sites section above, is submitted in support of the application.

Based on the application, as submitted, we are unable to provide your Authority with any assurance that the proposal 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.

National Landscape

The development is situated within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) / National Landscape. We note that there is no information regarding landscape assessments with the application and therefore, we are assuming that your Authority has screened the application and concluded that any impacts on landscape are unlikely and the proposal is in line with Planning Policy Wales. If you require further advice, then please reconsult us.

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.