Cyfoeth Naturiol Cymru
Natural Resources Wales

Our Ref: CAS-307639-X9R3

Your Ref: P/2026/0254

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 03 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Erection of single storey building

Lleoliad/Location: Activity Centre Cross Lanes Hotel, Wrexham, LL13 0TF.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 01 May 2026.

We have **concerns** with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following **conditions** to any planning permission granted:

- **Condition 1 : Protected Species**
- **Condition 2 : Protected Species**

Please note, without the inclusion of these conditions we would object to this planning application. Further details are provided below.

Protected Species

We welcome the submission of the following document in support of the above application for full planning permission to erect a single storey building on site

- Preliminary Ecological Appraisal, Robinwood Activity Centre, Maes y Nant, Bangor Rd, Wrexham, dated 14th April 2025.

We advise that the above document, particularly Section 6.0, is included in the approved list of plans / documents condition within the decision notice.

Bats and great crested newt are European Protected Species', legally protected under The Conservation of Habitats and Species Regulations 2017 (as amended). Legal protection relates to the animals themselves and the places they use to rest and breed.

Where a European Protected Species is 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 requirements set out in the legislation. A licence may only be authorised if:

i. The development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;

ii. There is no satisfactory alternative; and

iii. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are translated into planning policy through Planning Policy Wales (PPW) Edition 12, February 2024, section 6.435 and 6.4.36 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The planning authority should take them into account when considering development proposals where a European Protected Species is present.

Great Crested Newt (GCN)

The information provided within the submitted survey report concludes that GCN are present within three waterbodies (P1, P2 and P3), ponds that are subject to annual monitoring by the Amphibian and Reptile Conservation Trust. Pond 1 lies within 20m of the development boundary whereas Pond 2 and Pond 3 lie within 100m and 125m respectively. We therefore advise that there is a reasonable likelihood that GCN will be present on site.

We welcome the measures described within Section 6.6.9. 'Required Actions' of the submitted GCN survey report. However, we advise that further detail is provided within a Reasonable Avoidance Measures scheme for the proposal, to be submitted through the following planning condition;

Condition

No development including site clearance, shall commence until a Great Crested Newt (GCN) plan of reasonable avoidance measures has been submitted to and approved in writing by the Local Planning Authority. The plan of reasonable avoidance measures should include, but not necessarily be limited to:

- the measures to be carried that ensure working areas are clear of newts prior to the commencement of construction and related works
- details of timing, phasing and delivery of reasonable avoidance measures
- persons responsible for implementing the works
- details of measures to prevent or reduce incidental capture or killing

- biosecurity measures that considers invasive non-native species and specific diseases (e.g. Chytrid)

The plan of reasonable avoidance measures shall be carried out in accordance with the approved details.

Justification: To ensure that GCN are protected by the development.

European Protected Species Licence

We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Bats

There are known bat roosts that have been identified within the vicinity of the application site, using the west elevation of the lodge building in close proximity to the application site, as well as using the former hotel building within 30m of the application site. In this regard we welcome the reasonable avoidance measures provided within the Preliminary Ecological Appraisal report, and advise that these are implemented.

In addition, we advise that a lighting plan is submitted through condition to ensure that any proposed lighting is sensitive to bats utilising the wider site.

Condition

Prior to its installation, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. The Lighting Plan should include:

- Details of the siting and type of external lighting to be used
- Drawings setting out light spillage in key sensitive areas
- Details of lighting to be used both during construction and/or operation

The lighting shall be installed and retained as approved during construction and/or operation.

Justification: A lighting plan should be submitted to ensure lighting details are agreed prior to installation and to reduce the impacts of lighting in the interest of protected species.

Foul Drainage and Protected Sites

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, which meets the screening criteria set out in our Advice and we also note from an email received from the planning officer (dated 19th May 2026) confirming there will be no increase in nutrients from the site for this proposal, 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.

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,

John Littlemore
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: neplanning@cyfoethnaturiolcymru.gov.uk

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.