Ein cyf/Our ref: CAS-308716-L9C8
Eich cyf/Your ref: P/2025/0886

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 05 August 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Codi Pont / Erection of Bridge

Lleoliad/Location: Land Between F Lloyd Penley Ltd And Bedwell Park, Bridge Road South, Wrexham Industrial Estate, Wrexham, LL13 0TS

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the additional information on the above, which we received on 07 July 2026.

We continue to 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 **fluvial geomorphology** and **protected species**. If this information is not provided, we would object to this planning application. Further details are provided below.

We also advise that based on the information submitted to date, a **condition** regarding **protected species** should be attached to any planning permission granted. Without the inclusion of this condition we would object to this planning application.

Development affecting a watercourse

Fluvial Geomorphology

During 2025 site visits were carried out by NRW staff and it was observed that the abutments of the bridge have narrowed the cross-sectional area of the river channel. Typically, new bridge abutments are designed such that they span at least x1.3 the natural river channel width to minimise structural, geomorphological, hydrological and ecological impacts. The narrowing of this structure could increase the energy within the channel to erode the downstream banks and scour of the bed of the river through the structure (“contraction scour”). This could essentially wash out much of the riverine habitat

that would be otherwise present within the reach and unnaturally influence geomorphological processes for some distance.

No structural drawings or calculations have been submitted with the application. As such the applicant has not demonstrated that the bridge will not fail nor cause loss of land or riverine habitat within the reach.

We advise that the following additional information be submitted in support of this application:

- A description of the works and construction methodology including engineer's structural drawings (showing foundations, deck structure, concrete types used etc)
- Engineer's structural assessment to demonstrate whether the bridge built is suitable for the proposed use and loading (44 tonne HGVs were observed on site)
- Carry out and submit scour calculations in accordance with the industry guidance CS469 (published 2024 replacing BD97/12)
- Any scour calculated to be a result of the recent works should be assessed further (CFD/sediment modelling may be required) and mitigated in a sensitive manner that does not add to the degradation of the riverine environment (e.g. underpinning foundation, bioengineering erosion bankside protection measures)
- Details of materials used and any in-channel modification
- Information on the current surface-water drainage system serving the bridge approaches, the associated risk of contaminated runoff, and the measures incorporated to mitigate pollution during the operational phase.

Protected Species

We note there are records of great crested newts (GCN) and otters, both European Protected Species near to the site and therefore there is a reasonable likelihood of GCN and otters being impacted by the development.

GCN and otter and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981.

We have reviewed the following report submitted in support of the application and note that the walk over survey has been carried out after all construction works were completed:

- Preliminary Ecological Appraisal, Land between F Lloyd Penley and Bedwell Park, reference UES05251/01 dated 07/07/2026, United Environmental Services Ltd

As referenced in our previous response dated 23/01/2026 (reference CAS-295317-H4V9), Planning Policy Wales (Edition 12) (PPW) determines that pre-emptive works should not take place in advance of a planning application submission (p151 section 6.4.16) outlines that: 'Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point'. PPW also states that 'in designing mitigation measures where uncertainty exists, applicants should follow the precautionary principle and assume a significant effect' (3b p150).

Sections 2.3 and 3.3.7 refer to the otter survey and results however no assessment of otter as a feature of the River Dee & Bala Lake Special Area of Conservation has been included within the report.

We note that section 3.3.14 of the report states that “the watercourse continues to operate as a connected riparian corridor”.

We have concerns regarding the connectivity due to the structure having been built across the river banks thereby disrupting the terrestrial connectivity along the river banks.

We therefore advise that additional information is submitted in relation to any lighting associated with the operation of the bridge, including its location, specification, timing and controls, and an assessment of potential impacts on sensitive species such as bats and otters.

We also advise that additional information in the form of an Ecological Management Plan should be submitted. The plan should include details regarding long term habitat creation and enhancement to compensate for the losses arising from the bridge construction in addition to ongoing controls to prevent the spread of invasive non-native species. We would be satisfied with this further information being addressed through a suitably worded condition to secure the Ecological Management Plan.

The submission should demonstrate that the proposed development 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.

Flood Risk

The planning application proposes less vulnerable development – the construction of a bridge. The Flood Map for Planning identifies the application site to be at risk of flooding and partially within Flood Zone 3 (Rivers).

We refer you to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) for advice on how you should consider this application in line with current planning policy. Our role is to provide you with detailed advice on the findings and conclusions of the Flood Consequences Assessment (FCA) in relation to flooding from rivers and/or the sea, including the impact on flooding elsewhere. For advice on flood risk from surface water and or small watercourses you should consult with your Lead Local Flood Authority.

With regards to flood risk, we have reviewed the hydraulic modelling files used to inform the Flood Consequence Assessment (Weetwood Services Ltd. Final Report v1.0. May 2026).

The Weetwood FCA was compiled in support of the planning application associated with a retrospective application for the construction of a bridge over the designated main river Clywedog.

We would advise that the model has passed its review and is suitable to inform the FCA.

Our initial concerns relating to any unpermitted structures such as this, would be any increase in flood risk to others (third parties). The assessment has considered this and demonstrated that no third parties are impacted for a range of flood events, including climate change impacts. Although there is a minor measured increase, this is within land owned by the applicant (as shown in Appendix E of the FCA).

We therefore advise that the FCA has demonstrated that the retrospective planning application is acceptable in terms of flood risk and has followed the requirements of TAN15: Development, flooding and coastal erosion.

The authors of the FCA and the applicant should however be mindful that the model does have limitations and should it be used for any other purposes, our comments on the flood model checklist should be considered (forwarded to yourselves and the planning agent for reference). This includes the unpermitted bund which NRW required remedial works for it to be breached, so that floodplain connectivity was maintained. Neither the FCA nor planning application refer to this.

We will not be updating our published flood maps based on the FCA or hydraulic model. Should the applicant wish to challenge (change) the maps, then all 'amber' comments in the checklist will need to be addressed and a formal challenge submitted via our website: Natural Resources Wales / Challenging our flood maps.

Flood Risk Activity Permit

NRW has previously taken enforcement action under the Environmental Permitting (England and Wales) Regulations 2016, including the issue of a Remediation Notice on 14 March 2025 requiring cessation of unpermitted flood risk activities.

Retrospective Flood Risk Activity Permit (FRAP) cannot be issued to regularise works already undertaken, and any future permitting would be limited to mitigation and remediation proposals only.

This also relates to the constructed bund that does not form part of this retrospective planning application.

We advise that the following information would be required to enable further consideration in relation any future FRAP application:

- Site-specific hydraulic modelling of the River Clywedog demonstrating no increase in flood risk, including climate change allowances.
- Detailed bridge design information in line with current industry guidance.
- Ecological and environmental assessments addressing habitat loss, protected species, and imported materials, all to be advised by other functions.

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.