

Ein cyf/Our ref: CAS-316544-B7P3
Eich cyf/Your ref: P/2023/0547

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 03 September 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Conversion of barn to create offices

Lleoliad/Location: Barn at Buck Road, Commonwood, Holt, Wrexham, LL13 9TF

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) with additional information about the above, which we received on 14 August 2026.

We continue to 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: Protected species

In addition to the above condition the **document** identified below should be included in the approved plans and documents condition on the decision notice:

- Pescod, J. (2026). Dusk Survey Results: Outbuildings at Buck Road, Holt, Wrexham, LL13 9TF. Tyrer Ecological Consultants. (Unpublished)

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

Protected Species

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

- Pescod, J. (2026). Dusk Survey Results: Outbuildings at Buck Road, Holt, Wrexham, LL13 9TF. Tyrer Ecological Consultants. (Unpublished)

We note that the ecology report has identified that the application site supports the following species of bat: Common pipistrelle; Soprano pipistrelle; Whiskered/Brandt's and Brown long-eared.

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 above report provides an adequate basis upon which to consider the potential impacts of the scheme on these species and inform the decision-making process.

We consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range provided the measures set out in the submitted report are appropriately implemented and any subsequent consent is subject to the imposition of the conservation plan condition found below.

We advise that the following document is included in the approved list of plans / documents within the decision notice:

- Pescod, J. (2026). Dusk Survey Results: Outbuildings at Buck Road, Holt, Wrexham, LL13 9TF. Tyrer Ecological Consultants. (Unpublished)

We also advise that any subsequent consent is subject to the imposition of the following bat conservation plan condition:

Condition - Bat Conservation Plan: No development including site clearance, shall commence until a Bat Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan should build upon the principles outlined in the bat report (reference Pescod, J. (2026). Dusk Survey Results: Outbuildings at Buck Road, Holt, Wrexham, LL13 9TF. Tyrer Ecological Consultants. (Unpublished) and shall include, but not necessarily be limited to:

- Details of timing, phasing and duration of construction activities and conservation measures;
- A timetable for implementation of conservation works demonstrating how works are aligned to the construction and phasing of the development;
- Persons responsible for implementing the works;
- principles of a lighting scheme to avoid lighting bat access points and flight lines
- Post construction monitoring over a period of 5 years
- Proposals to evidence compliance (we advise ecological compliance audit together with defined key performance indicators)

The Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that bats are protected by the development

We also advise that the works are carried out under 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.

Protected Sites – Foul Drainage

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 Special Areas of Conservation](#), under the Habitats Regulations, planning authorities must consider the impact of proposed developments on water quality within SAC river catchments.

We note the inclusion of the Habitats Regulations Assessment (HRA) Screening Report, prepared by the case officer and submitted in support of the application. The report concludes that the proposed development would not result in an increase in phosphate inputs to the River Dee SAC.

Having considered the findings of the screening report, and recognising the specific nature and scale of the proposal, we are satisfied that the development is unlikely to give rise to additional nutrient inputs or establish a pathway through which adverse effects on the SAC could occur. As such, it would be reasonable for your authority to screen out this proposal as not likely to have a significant effect on the River Dee 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,

Alisha Tyrrell-Liptrot

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.