Cyfoeth Naturiol Cymru
Natural Resources Wales

Our Ref: CAS-315432-P4G3

Your Ref: P/2025/0143

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 04 September 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Dymchwel adeileddau presennol a chodi cyfleusterau cyflogaeth (dosbarth B2/B8) gyda llety swyddfa ategol (dosbarth B1a) gan gynnwys tirlunio, parcio, mynediad a gwaith cysylltiedig arall / demolition of existing structures and erection of employment facilities (class B2/B8) with ancillary office accommodation (class B1a) including landscaping, parking, access and other associated works

Lleoliad/Location: Land South Of Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9US

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the additional information for the above, which we received on 31 July 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 **conditions** to any planning permission granted:

- Condition 1: Protected Sites
- Condition 2: Biosecurity Risk Assessment
- Condition 3: Contaminated Land – Scheme to Deal with Risks Associated with Contaminated Land
- Condition 4: Contaminated Land - Verification Report
- Condition 5: Contaminated Land – Unsuspected Contamination
- Condition 6: Contaminated Land – Surface Water Drainage
- Condition 7: Contaminated Land – Piling and/or Foundations Design

We also are satisfied that our concerns can be overcome if the **documents** identified below are included in the approved plans and documents condition on the decision notice:

Approved Documents:

- Land South of Bryn Lane, Landscape and Ecological Management Plan, reference 10204.004 version 4.0 dated January 2026
- Land South of Bryn Lane, GCN Conservation Plan, reference 10204.005 V3 version 3 dated January 2026
- Soft Landscape Design, Drawing number 1059-01-NLD.151 Bryn Lane South, Revision V6 dated 03/02/2026
- Land South of Bryn Lane, Bat Survey Technical Report, reference 10204.003 version 2 dated July 2025, The Environment Partnership Ltd.
- Land South of Bryn Lane, Phosphate Assessment, reference T/23/2721, version 1.3 dated 26/05/2026, Tier Consult
- Phosphate Mitigation Area, drawing number: 2894-TCG-XX-XX-DR-C-6002, revision P03 dated 26/05/2026, Tier Consult

Without the inclusion of these documents and conditions we would object to this planning application.

Protected Sites and Foul Drainage

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.

This application proposes connection of foul water to the mains sewer. The proposed development could lead to an increase of phosphorus load from the receiving wastewater treatment works into the River Dee and Bala Lake SAC. The majority of the River Dee catchment is currently failing to meet water quality targets for phosphorus. The nutrient impacts of new connections need to be considered on a case-by-case basis within the Habitats Regulations Assessment process.

We have reviewed the following additional document submitted in support of this application:

- Land South of Bryn Lane, Shadow Habitats Regulations Assessment, reference 10204.006, version 2.0 dated 07/2026, The Environment Partnership Ltd

It is ultimately for your Authority to be satisfied whether a proposal will result in an adverse effect on the integrity of the River Dee and Bala Lake SAC. Our advice presented below is intended to assist you with your assessment of the proposal.

We note Section 8.1 of the previously submitted Phosphates Assessment, confirms that the total phosphorus mitigation required by the proposed development is 2.35kg total phosphorus/year. We understand the intention is for this mitigation to be provided as part of the Strategic Ecological Corridor, which is the subject of a separate planning application (ref P/2025/0431) which was granted permission 01 June 2026. Subject to the corridor being guaranteed, and suitable long-term management and maintenance arrangements being secured for the lifetime of the development, we would consider this to be acceptable mitigation.

We therefore continue to advise that should you be minded to grant permission for this application, your Authority secure the delivery of the proposed Strategic Ecological Corridor to your satisfaction either through a Grampian style condition (Condition 1: Protected Sites) or legal agreement. The condition or legal agreement should ensure that the corridor is in place and capable of performing the function required to offset the phosphorus discharges prior to the occupation or operation of the development and maintained as such for the duration of the development. Please also refer to our comments regarding securing the Strategic Ecological Corridor in relation providing off-site compensation for great crested newts under 'Protected Species' below.

If your Authority is able to reasonably conclude that the proposal will not result in adverse effect on the integrity of the River Dee and Bala Lake SAC, we raise no concerns with regards protected sites.

Please consult us on any Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Protected species

Great crested newts (GCN)

Section 3.13 (page 22) of the previously submitted Ecological Impact Assessment (The Environment Partnership, Reference 10204.002, Version 5 dated January 2025) confirms GCN records within 100m of the application site and Section 3.15 (page 22) confirms the majority of GCN records are to the south and connected to the application site by a woodland corridor.

The information has identified that GCN are material to the application site.

We have reviewed the following additional information submitted on 10/03/2026:

- Land South of Bryn Lane, Landscape and Ecological Management Plan, reference 10204.004 version 4.0 dated January 2026
- Land South of Bryn Lane, GCN Conservation Plan, reference 10204.005 V3 version 3 dated January 2026
- Soft Landscape Design, drawing number 1059-01-NLD.151 Bryn Lane South, Revision V6 dated 03/02/2026

We note the updates to both reports and the Soft Landscape Design (V6 dated 03/02/2026) drawing following the points raised in our previous letter dated 1 December 2025 (reference CAS-292629-G1Y6) and consider these to be satisfactory. Whilst the functionality of the site is not considered to reflect best practice in terms of habitat connectivity, given the constraints with site layout we accept the on-site ecological provisions in respect of GCN.

We note that Section 1.59 of the GCN Conservation Plan states that "existing retained habitats within the southern and eastern boundaries have been identified as suitable receptor sites for GCN captured during the proposed works" and therefore our understanding is that there will be no translocation of GCN from the application site to off-

site provisions. If this is not the case further information regarding any proposed off-site translocation of GCN should be submitted.

Off-site compensation

We note that the off-site compensation area for GCN is also to be progressed under the separate application (reference P/2025/0431) for the Strategic Ecology Corridor. Whilst these are separate applications, it should be noted that the off-site provision relating to GCN for this application (P/2025/0143) will need to be completed satisfactorily prior to any site works commencing at this application site.

As detailed above under 'Protected Sites and Foul Drainage', any permission granted should secure the delivery of the proposed Strategic Ecological Corridor through a Grampian-style condition and/or legal agreement. This mechanism should ensure the corridor is delivered, operational, and maintained so as to deliver the off-site compensation for GCN in addition to offsetting phosphorus discharges prior to occupation/operation of the development and for its lifetime.

Biosecurity

Sections 3.13-3.26 of the submitted Landscape and Ecological Management Plan (LEMP) discusses measures to be taken in relation to the confirmed presence of Crassula helmsii on site. Whilst we note the provisions we advise that any consent includes the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

Condition 2: Biosecurity Risk Assessment

No development, including site clearance, shall commence until a Biosecurity Risk Assessment, and Method Statement that considers invasive non-native species and specific diseases (e.g. Chytrid) has been submitted to and approved in writing by the Local Planning Authority.

The risk assessment must include:

- appropriate measures to control any INNS on site
- measures or actions that aim to prevent INNS from being introduced to the site for the duration of construction and operational phases of the scheme

The risk assessment shall consider landscaping and other related plans.

The Biosecurity Risk Assessment shall be carried out in accordance with the approved details.

Justification:

To ensure that an approved Biosecurity Risk Assessment is implemented to secure measures to prevent or control the spread and effective management of any invasive non-native species and listed diseases at the site.

Bats

Section 3.9 of the previously submitted Bat Survey Technical Report (Land South of Bryn Lane, Reference 10204.003, Version 1.0 dated November 2024) reported no roosting bats were present during the nocturnal survey carried out on 05/11/2024, however Section 3.12 stated that there was moderate potential for hibernating bats and that “hibernation surveys are currently being undertaken”.

We have reviewed the following additional information submitted on 02/09/2025:

Land South of Bryn Lane, Bat Survey Technical Report, reference 10204.003 version 2 dated July 2025, The Environment Partnership Ltd.

We note that Sections 3.9 and 3.10 of the updated Bat Survey Technical Report (version 2 July 2025) confirms that no roosting bats were recorded using the site, however section 5 recommends precautionary pre work checks to be carried out prior to demolition of the structure, which we agree with.

We consider that the above report provides an adequate basis upon which to consider the potential impacts of the scheme on bats 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 implemented.

Therefore, we advise that the following document is included in the approved list of plans / documents condition within the decision notice:

- Land South of Bryn Lane, Bat Survey Technical Report, reference 10204.003 version 2 dated July 2025, The Environment Partnership Ltd.

Contaminated land

We have reviewed the following documents submitted in support of this application:

- Preliminary Risk Assessment Report, Land South of Bryn Lane, Reference: TE1891-TE-00-XX-RP-GE-001-V02, Version 2 dated 08/05/2025, Tier Environmental Ltd
- Ground Investigation Report, Land South of Bryn Lane, Reference: TE1891-TE-00-XX-RP-GE-002-V03, Version 3 dated 08/05/2025, Tier Environmental Ltd

The ground investigation report notes that only two groundwater samples were able to be obtained from two locations. There appears to be no discussion regarding groundwater levels within Section 8 of the report or what impact this has on the conceptual understanding of the hydrogeological regime. Additionally, we would advise a minimum of two rounds of groundwater monitoring and this approach is supported by BS10175:2011 (Investigation of Potentially Contaminated Sites - Code of practice).

Therefore, based on the information submitted (and in the absence of the above) we would advise that the following conditions should be applied to any planning permission granted for this proposal.

Condition 3: Scheme to deal with Risks Associated with Contaminated Land

No development shall commence until the following components of a scheme to deal with the risks associated with contamination at the site has been submitted to, and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:
- all previous uses.
- potential contaminants associated with those uses.
- a conceptual model of the site indicating sources, pathways and receptors.
- potentially unacceptable risks arising from contamination at the site [Largely completed].

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification:

To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

Condition 4: Verification Report

Prior to the occupation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification:

To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated prior to occupation or operation, to prevent both future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological

systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Condition 5: Unsuspected Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification:

To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks. A site investigation may not uncover all instances of contamination, and this condition ensures that contamination encountered during the development phase is dealt with appropriately.

Condition 6: Surface Water Drainage

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Justification:

To prevent both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water pollution.

Condition 7: Piling and/or Foundations Design

No development shall commence until details of piling or any other foundation designs using penetrative methods sufficient to demonstrate that there is no unacceptable risk to groundwater have been submitted to and approved in writing by the Local Planning Authority. The piling/foundation designs shall be implemented in accordance with the approved details.

Justification:

Piling/foundation details should be submitted to ensure there is no unacceptable risk to groundwater during construction and methods/design are agreed prior to the commencement of development or phase of development.

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This

voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste.

Developers should ensure that all contaminated materials are adequately characterized both chemically and physically, and that the permitting status of any proposed on site operations is clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should:

- Follow the risk management framework provided in Land contamination risk management (LCRM)
- Refer to 'Land Contamination: a guide for developers (WLGA, 2017) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to the Environment Agency's (2017) 'Approach to Groundwater Protection

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.