Ein cyf/Our ref: CAS-317416-H9F6
Eich cyf/Your ref: P/2025/0638

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 06 October 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Erection of replacement industrial building

Lleoliad/Location: R and R Engineering Workshop, Oak Road, Wrexham Industrial Estate, Wrexham, LL13 9RG

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 25 August 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 **protected species and contaminated land**. 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.

Protected Species

We have reviewed the following additional information which has been submitted in support of the application:

- Great Crested Newt Habitat Suitability Index (HSI) Survey Report and Method Statement, version V2 dated 29/07/2026, Elite Ecology

The proposal has the potential to kill, injure, disturb Great Crested Newts (GCN), or damage or destroy their breeding sites and resting places at this site. GCN 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. Where GCN 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 requirements set out in the legislation. A licence may only be authorised if:

- 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;
- There is no satisfactory alternative; and,
- 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.

To avoid developments with planning permission subsequently not being granted a licence, the Local Planning Authority should take Planning Policy Wales and Technical Advice Note 5 into account when considering development proposals where a European Protected Species is present. Please note, for the purposes of providing advice at the planning application stage, our comments are limited to compliance with the third test only.

We consider that the current submission is insufficient for the purposes of demonstrating that the proposal is not likely to be detrimental to the maintenance or restoration of the favourable conservation status of GCN.

Great Crested Newt Habitat Suitability Index (HSI) Survey Report and Method Statement

We note the submission of the Great Crested Newt Habitat Suitability Index (HSI) Survey Report and Method Statement and advise that the following points are addressed and submitted, either in an updated Great Crested Newt Habitat Suitability Index (HSI) Survey Report and Method Statement or contained within a separate GCN Conservation Plan.

The Executive Summary in the report recommends further survey to confirm presence or absence of GCN. We continue to advise that we do not consider that further survey is a requirement due to known presence in Pond 1 from previous survey efforts related to separate applications in the area. We are therefore basing our comments on a confirmed presence in the immediate vicinity of the application site.

- Appendix D refers to standard legislation and licensing requirements in terms of GCN, however no reference is made in section 6 to applying for a licence prior to works commencing on site. We advise that due to the location of the application site in relation to a confirmed breeding pond, a licence will be required prior to any site clearance or construction works commencing.
- Figure 7 of the updated report shows the location of the two proposed hibernacula, however these are both outside of the red line application boundary and no information regarding the long-term management, tenure and monitoring of these features has been submitted.
- Section 6, page 19 states that “At the completion of the works, Elite Ecology will produce a letter statement to detail all amphibians captured and translocated. This will include photographic evidence of the works, the amphibians translocated and the site at the completion of the works”. No information is provided regarding where any GCN found during the works would be translocated to and there is no reference to carrying

this out under licence. Further information regarding a proposed receptor site is needed in addition to licensing requirements highlighted above.
- The submission of compensatory / mitigation habitats by either on site or off-site conservation proposals. This could include provision of an on-site or off-site conservation scheme or commuted sum (please see below for further information).
- We also note the reference to contacting Natural England in section 6 should GCN be encountered during the works, please note that this should be amended to Natural Resources Wales.

Drainage Plan Layout

We note the submission of the proposed Drainage Plan Layout and the inclusion of features such as filter drains, rain garden and permeable paving. We welcome these drainage features in relation to GCN.

We advise that further information should be provided to confirm that gully pot type drainage infrastructure will not be installed along with details regarding covers for the proposed 'Ridgistorm Separate Catchpit'.

We therefore advise that the above information is submitted either in an updated version of the Great Crested Newt Habitat Suitability Index (HSI) Survey Report and Method Statement, or that the information is submitted in a GCN Conservation Plan. We advise that the above information would also be needed in support of a GCN License application which will be required for the works.

In addition to the above, in line with section 6.11 of Local Planning Guidance Note No 29 - Wrexham Industrial Estate Employment Development and Nature Conservation, we advise your authority to consider whether the provision of a commuted sum is appropriate for this application via a planning obligation. Please note that points raised above would still need to be addressed in respect of ensuring GCN are not harmed during the construction and operational phase of the development.

Biosecurity Risk Assessment

The submitted information does not contain any information regarding biosecurity measures to be implemented during the construction phase. We therefore advise that a Biosecurity Risk Assessment condition should be attached to the decision notice should permission be granted.

Condition: Biosecurity Risk Assessment

No development, including site clearance, shall commence until a Biosecurity Risk Assessment, and Method Statement that considers invasive non-native species (INNS) 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.

Contaminated Land

The application site is located on a principal aquifer, we therefore consider the controlled waters at the site to be vulnerable to pollution and any new development needs to consider the risk to controlled waters.

We note that no information regarding contaminated land investigations has been submitted in support of this application.

Given the historic ammunitions production at Wrexham Industrial Estate and the existing industrial nature of the site and surrounding area, we strongly suspect there could be contamination at the application site.

We consider that insufficient information has been submitted to demonstrate that the risk of pollution to controlled waters is acceptable. Therefore, we advise that a preliminary risk assessment that satisfactorily addresses the potentially unacceptable risks should be submitted to demonstrate that a viable generic remediation option is available if required.

On this basis, if no further information is submitted in support of the application then we would object to the proposed development.

Informative / advice to applicant

Natural Resources Wales recommends that developers should:

- Follow the risk management framework provided in Land contamination risk management (LCRM)
- Refer to 'Development of Land Affected by 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 our groundwater protection advice on www.gov.uk.

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 (22 October 2025), 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.

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.