



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-316076-W5Y9
Eich cyf/Your ref: P/2022/0065

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

Wrexham County Borough Council,
The Guildhall,
Wrexham,
LL11 1AY

08/10/2026

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: Hybrid application - (a) full permission to erect 30 units for b1/b2/b8 use, refurbishment of existing retail and food and drinks units. (b) outline permission (all matters reserved except access) for up to 13 industrial (b1/b2/b8 use) with associated access, landscaping and infrastructure work

LLEOLIAD / LOCATION: The Bridgeway Centre, Bridge Road, Wrexham Industrial Estate, Wrexham, LL13 9QS

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 15/09/2026.

We have **concerns** with the application and advise that based on the information submitted to date, **conditions** regarding **Land Contamination** and **Protected Species** should be attached to any planning permission granted and the **documents** identified below should be included in the **approved plans and documents condition** on the decision notice. Without the inclusion of these conditions and documents, we would object to this planning application.

Conditions: 1-2 Land Contamination

Documents:

Foley, N (2024) Bat Presence / Absence Survey: Bridgeway Centre, Bridge Road, Wrexham, LL13 9QS. United Environmental Services. (Unpublished Report No UES03012/13)

Clark, E. (2020). Preliminary Ecological Appraisal: Bridgeway Centre, Bridge Road, Wrexham, LL13 9QS. United Environmental Services. (Unpublished Report No UES03012/01)

Kenwright, T (2025) Habitat Management and Monitoring Plan. (Unpublished Report No UES03012/21)

Protected Sites – Foul Drainage

We note the application site is within the catchment of the River 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.

We have considered the completed Appropriate Assessment (AA) dated 15/09/2026 and note your conclusion that *‘Subject to the implementation of the proposed mitigation measures, and taking these fully into account, it can be concluded that the development will not result in adverse effects on the integrity of the SAC’*.

With regards to the mitigation measures, we would advise that provided you are satisfied that the mitigation measures specified are guaranteed, effective, reliable, timely and will be maintained for the lifetime of the development, we would raise no concerns with the conclusion of your AA. For further guidance, we refer you to the section titled ‘Avoidance and Mitigation Measures’ within our [Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation](#)

In addition to the above, we also suggest you refer to our recent letter to PEDW in respect of the Lower Berse Farm appeal (our letter dated 02/10/2026, ref CAS-319390-W3H1), a copy of which is enclosed for your ease of reference. Notwithstanding the conclusion of your AA, we advise you to have regard to the advice within that letter, as part of your determination of this application. The letter sets out NRW's broader position on the management of limited phosphorus headroom within the River Dee catchment. Our evidence shows that environmental capacity is finite, and in the absence of mitigation measures to achieve nutrient neutrality, individual developments cumulatively will consume that capacity. Decision-makers should therefore be mindful that, in the absence of an established approach to protect the SAC and balance development growth, longer-term opportunities for further development may become constrained by environmental capacity. In this regard, the issues raised in the enclosed letter remain relevant to the determination of planning applications within the catchment.

Land Contamination

The Site for development is located within or near to several controlled waters and conservation features. A drain lies immediately to the north of the Site draining to Redwither Brook, which is approx. 20 m NE of Site and flows into the nearby Afon Clywedog, which flows into the River Dee. The Site is in the River Dee catchment and lies in between two Groundwater Source Protection Zones (SPZs) approximately 200 m north and south of the Site boundaries. Because of the Site's current and past history as outlined in the Phase I Preliminary Risk Assessment (PRA) Report (Sutcliffe, July 2017), and as stated in the Conclusions and Recommendations of the PRA (extract below), we agree that additional work recommended by Sutcliffe is required.

Extract from Sutcliffe, July 2017: Recommendations and Conclusions

Based on the findings of the Phase I PRA review, Sutcliffe Investigations do not consider there to be any identifiable significant environmental issues regarding the site, however without an investigation of the site this cannot be discounted as the site has previously and currently been used for varied industrial purposes, There is limited information of the ground for geotechnical properties and as such we would therefore recommend the following sequential works are undertaken:

- *Commission an Initial UXO Desk Based Assessment. If this confirms a medium to high risk from UXO then a Detailed UXO Desk Based Assessment will be required.*
- *Submission of this Phase I PRA Report for the benefit of validating the outline planning application.*
- *Commission a Phase II Ground Investigation designed to discharge any contaminated land conditions that may be assigned to the site and allow the design of economic foundation solutions.*
- *Commission a Flood Risk Assessment”*

Based on the potential risk to nearby controlled waters (and other potential receptors) we recommend that the Local Authority apply the following Contaminated Land Conditions.

Condition 1: Land affected by contamination - No development shall commence until the components 2 through 4 of a scheme to deal with the risks associated with potential contamination at the site, has been submitted to and approved in writing by the Local Planning Authority. As noted above, component 1 has been submitted.

1. A preliminary risk assessment which has identified:
 - a. all previous uses
 - b. potential contaminants associated with those uses
 - c. a conceptual model of the site indicating sources, pathways and receptors
 - d. potentially unacceptable risks arising from contamination at the site
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 potential contamination at the site have been fully considered prior to commencement of development as controlled waters downstream of the Site are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

Condition 2: 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.

Protected Species

Great Crested Newts (GCN)

We note that the Preliminary Ecological report submitted in support of the above application (United Environmental Services, August 2020) states that GCN presence is unlikely at the development site. However, we note the reasonable avoidance measures proposed in the event that GCNs are found, and advise that these measures are implemented.

We advise that the report should be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted, to secure the recommendations / avoidance measures discussed within the report with regards to GCN. We advise that the LPA's ecologist should be consulted and discuss whether one way fencing should be included within the GCN Reasonable Avoidance Measures.

We note the submission of a Habitat Management Plan (United Environmental Services Ltd, January 2025. Ref UES03012/21) regarding the area designated for off-site mitigation. We advise that the measures are implemented and that this report should also be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Bats

We note that the bat report submitted in support of the above application (United Environmental Services, August 2024) has identified that bats are present at the application site. From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document '*Natural Resources Wales*

Approach to Bats and Planning (2015)'. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

As this is a lower risk case for bats, 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.

Furthermore, we advise that the proposed development is not likely to harm or disturb the bats or their breeding sites and resting places at this site, provided the avoidance measures described in the bat report are implemented.

The report must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Please consult us again if any further information shows that this is no longer a lower risk case

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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 on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Siôn M. Williams

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