Ein cyf/Our ref: CAS-321221-R4L3
Eich cyf/Your ref: P/2026/0612

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 26 October 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: New steel framed storage building ancillary, subordinate and separate to the existing large steel framed commercial building on the site, required to accommodate works operations

Lleoliad/Location: Unit 13, Abenbury Way, Wrexham Industrial Estate, Wrexham, LL13 9UZ

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

We 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**. 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 information which has been submitted in support of the application.

- Preliminary Ecological Appraisal & Roost Assessment, Unit 13 Abenbury Way, Version 1.0, dated 11/09/2026, Arbtech Consulting Ltd

Our records indicate that there are multiple GCN records within 345m of the application site, including a breeding pond.

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.

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.

Due to the proximity of multiple GCN records within close proximity to the site, we advise your authority to consider whether the provision of a commuted sum is appropriate for this application via a planning obligation, in line with section 6.11 of Local Planning Guidance Note No 29 - Wrexham Industrial Estate Employment Development and Nature Conservation.

We note that section 8 of the submitted ecology report provides details of a precautionary working method to be implemented during the construction phase. We welcome these provisions, however, we advise that additional information should be submitted in support of the application in relation to reasonable avoidance measures.

We would be content for the further information regarding reasonable avoidance measures to be provided via a suitably worded condition.

We therefore advise the following condition in respect of GCN is included on any permission granted.

Condition: No development or phase of development, including site clearance, shall commence until a Great Crested Newt (GCN) plan of reasonable avoidance measures has been submitted to and approved in writing by the Local Planning Authority. The plan of reasonable avoidance measures should include, but not necessarily be limited to:

- build on the principles within section 8 of the Preliminary Ecological Appraisal & Roost Assessment
- fence design, construction and maintenance (the erection of amphibian proof fencing, prior to and throughout the duration of construction operations)
- details of timing, phasing and delivery of reasonable avoidance measures

The plan of reasonable avoidance measures shall be carried out in accordance with the approved details.

Justification: To ensure that GCN are protected by the development.

Protected Sites and 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.

However, recognising that there is no increase in employment numbers associated with the proposed development, we are satisfied that there is unlikely to be a source of additional nutrients and 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.

Contaminated Land

Based on the information available at this stage, Natural Resources Wales considers that the controlled waters at this site are not of the highest environmental sensitivity, therefore we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

It is recommended that the requirements of Planning Policy Wales and the Land Contamination Risk Management (LCRM) guidance should be followed.

These comments are based on our assumption that gross contamination is not present at this location. If, during site investigation or development, gross contamination is found to be present at the site the Local Planning Authority may wish to re-consult Natural Resources Wales.

Our comments relate only to risks to controlled waters, for potential risks to human health the Local authority Environmental Health or Pollution Control department should be consulted.

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.