Ein cyf/Our ref: CAS-321843-Y6V7
Eich cyf/Your ref: P/2026/0488

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 05 November 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Codi maes parcio aml-lawr a mynediad cysylltiedig / Erection of multi-storey car park and associated access

Lleoliad/Location: Building 7 Ispen Biopharm Ltd, Ashroad North

Thank you for reconsulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 16 October 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(s)** to any planning permission granted:

- Condition 1: Reasonable Avoidance Measures (RAMs)
- Condition 2: Biosecurity Risk Assessment
- Condition 3: Updated LEMP
- Condition 4: Lighting Plan
- Condition 5: Land Affected by Contamination
- Condition 6: Contamination Verification Report
- Condition 7: Unsuspected Contamination
- Condition 8: Piling
- Condition 9: Surface Water Drainage

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

Protected Species

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

- Finch M. (2026). Preliminary Ecological Appraisal (PEA) and NBB Statement. Land Studio. (Unpublished Report No.: 498-LST-XX-XX-RP-0002 PEA – Ipsen East MSCP (Updated October 2026)

The information has identified that great crested newts (GCN) are material to the application site.

The proposal has the potential to kill, injure, disturb 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
- 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 of the favourable conservation status of GCN.

We note the submission of a submitted Drainage maintenance Strategy and ecology comments confirming use of rain gardens, with gullypots being restricted to the connection with Ash Road South.

Table 3 also includes precautionary measures to be implemented during the construction phase. We advise that further information and measures are needed in relation to GCN to manage the potential impacts of the scheme. This includes a biosecurity risk assessment due to the application site proximity to known GCN records.

We therefore advise the following conditions in respect of GCN are included on any permission granted.

Condition 1: Reasonable Avoidance Measures (RAMs)

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:

- Fence design, construction and maintenance (the erection of a one-way amphibian fence, prior to and throughout the duration of construction operations)
- Proposals for the clearance of individuals from working areas
- Details of timing, phasing and delivery of reasonable avoidance measures
- Details of a toolbox talk for contractors regarding GCN identification and its protected status
- Plans to commit to daylight working to avoid the GCN active period
- Plans to elevate construction materials above ground-level and to avoid storing materials close to boundary vegetation
- If GCN are found on site during works, all works should stop and NRW contacted for further advice

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.

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 should include:

- The identification of any Invasive Non-native Species (INNS), or certain diseases present within or in the environs of the application site;
- Confirmation of measures to eradicate control identified INNS or listed diseases present within or in the environs of the application site; and
- Measures or actions that aim to prevent INNS/identified diseases colonizing including introduction to the site for the duration of construction of the scheme.

Justification:

To ensure that GCN are protected by the development.

The applicant should be aware that in the event of GCN being found on site during the work, all works should stop and NRW contacted for further advice. Operations may only recommence after an appropriate licence has been issued by NRW and any conditions complied with.

Condition 3: Updated LEMP

No development, including site clearance, shall commence until an updated Landscape and Ecological Management Plan (LEMP) for the provision, management and maintenance of the landscape and ecological features at the site has been submitted to and approved by the Local Planning Authority. The updated Plan should include provisions

that consider GCN during the implementation of site management and SUDS maintenance.

Justification: A LEMP should be agreed to ensure necessary habitat management measures for Great Crested Newt are agreed prior to commencement and appropriately managed in the long-term.

Bats

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

- Finch M. (2026). Preliminary Ecological Appraisal (PEA) and NBB Statement. Land Studio. (Unpublished Report No.: 498-LST-XX-XX-RP-0002 PEA – Ipsen East MSCP) (updated October 2026)

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

Notwithstanding this, we also advise that further information is required to manage the potential impacts of the scheme in respect of lighting.

Table 3 of the report identifies that commuting and foraging bats may be impacted by the introduction of artificial lighting. The report states that:

"…it is recommended that any lighting scheme be designed in accordance with the latest guidance, Bats and Artificial Lighting at Night (Institute of Lighting Professionals, 2023)"

We concur with this approach and advise that a lighting plan should be submitted. The lighting plan should consider existing and proposed lighting together with any spillage originating from internal light sources including:

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

Condition 4: Lighting Plan

Prior to installation a Lighting Plan has been submitted to and approved in writing by the Local Planning Authority. This Lighting Plan shall consider existing and proposed lighting together with any spillage originating from internal light sources including:

- Details of lighting to be used during and post construction
- Plans illustrating the location and type of lighting
- Plans illustrating projected or retained bat emergence points; together with retained or proposed features planned to be functionally used by bats for foraging/dispersal purposes
- Provisions of the scheme shall accord with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/23: Bats and Artificial Lighting at Night.

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

Justification:

To ensure that bats are protected by the development.

Contaminated Land

We have concerns with the proposed development due to the risk posed to controlled waters as the application site sits partially within a Source Protection Zone (3).

We have reviewed the Phase 1 Preliminary Risk Assessment (reference GSL3506R01, dated 25 June 2026, Groundsolve Ltd) and broadly agree with the proposed ground investigation, groundwater monitoring, as well as physical and chemical testing that is detailed within the report.

We note that the site is located on former military land used as a munitions factory, as well as within the current wider Wrexham Industrial Estate, which presents an elevated risk of land contamination and potential impacts to controlled waters. We also note from the provided documents that piled foundations are anticipated to be required, and that a new surface water drainage system is planned.

We advise that clarification on whether the potential for contamination from historic munitions production activity and neighbouring industrial sites has been fully considered, and whether the Phase 1 report's proposed chemical testing (currently limited to metals, PAHs and asbestos due to potential made ground) should be expanded to include a broader suite of inorganic and organic contaminants, considering the site's former ownership/use and location within the wider Wrexham Industrial Estate.

We advise your Authority that conditions should be applied to any planning permission granted for this proposal, as follows.

Condition 5: Land Affected by Contamination

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

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 (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 (largely completed).

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 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.

5. 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 6: Contamination Verification Report

Prior to the occupation or operation 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 7: 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.

Condition 8: Piling

No development, or phase of 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.

Condition 9: Surface Water Drainage

No infiltration of surface water drainage into the ground is permitted unless details, which demonstrate that there is no resultant unacceptable risk to controlled waters, have first been submitted to and approved in writing by the Local Planning Authority. 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.

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.

However, recognising the specific nature of the application submitted, a multistory carpark, 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,

Callum Whitehead

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.