Ein cyf/Our ref: CAS-269902-P0N6
Eich cyf/Your ref: P/2024/1582

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 13 December 2024

Dear Sir/Madam,

PROPOSAL: PRIOR NOTIFICATION FOR DEMOLITION OF FORMER CLUBHOUSE BUILDING

LOCATION: JAMES JONES AND SONS PALLETS AND PACKAGING LTD, OAK ROAD, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9RG

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 03 December 2024.

We have considered your enquiry in relation to our Development Planning Consultations Topics document (September 2018). We advise the following matters are relevant to your site / proposed development and suggest you consider these further prior to the submission of any planning application:

Protected Species
We note that the bat report submitted in support of the above application (Grey, R. (2024). Demolition of Clubhouse Building, Oak Road, Wrexham Preliminary Ecological Appraisal. Etive Ecology . (Unpublished) and Grey, R. (2024). Demolition of Clubhouse Building, Oak Road, Wrexham: Bat Survey/Method Statement. Etive Ecology . (Unpublished)) has identified that bats are present at the application site.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 amended). Where bats 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 tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

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. However, we advise that the proposed development is likely to harm or disturb the bats or their breeding sites and resting places at this site and, therefore, we advise that all avoidance and mitigation measures described in the bat report must be undertaken.

NRW would refer the Local Authority to the Chief Planning Officer's letter dated 01 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Protected Sites

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* (28 June 2024), 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 demolition of clubhouse with no foul drainage, 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.

If you have any queries on the above, please do not hesitate to contact us.

Yours faithfully

Ruth Prichard
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.