Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-278415-L9X5
Eich cyf/Your ref: P/2025/0321

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 16 April 2025

Dear Sharon Holman,

BWRIAD/PROPOSAL: AMRYWIO AMOD 2 CANIATÂD CYNLLUNIO P/2021/0604 I DIWYGIO DYLUNIAD/VARIATION OF CONDITION 2 OF PLANNING PERMISSION P/2021/0604 TO AMEND DESIGN

LLEOLIAD/LOCATION: LOWER FARM, BOWLING BANK, WREXHAM, LL13 9RY

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 08 April 2025.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the documents identified below are included in the approved plans and documents condition on the decision notice:

Approved documents:

- **Griffin, E. (2021). Bat Emergence and Re-entry Surveys: Barn at Lower Farm (Plot 6), Bowling Bank, Wrexham, LL13 9RY. Arbtech. Unpublished.**

- **Sawrey, L. (2021). Preliminary Ecological Appraisal and Preliminary Roost Assessment. Arbtech, Unpublished**

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

Protected Species

We have reviewed the following submissions:

- Griffin, E. (2021). Bat Emergence and Re-entry Surveys: Barn at Lower Farm (Plot 6), Bowling Bank, Wrexham, LL13 9RY. Arbtech. Unpublished.
- Sawrey, L. (2021). Preliminary Ecological Appraisal and Preliminary Roost Assessment. Arbtech, Unpublished

Bats and Great Crested Newts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

We consider that the development is not likely to be detrimental to the maintenance of any 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 any bats or Great Crested Newts, or their breeding sites and resting places at this site, provided the avoidance measures described in the Bat Emergence and Re-entry Surveys (for bats) and Preliminary Ecological Appraisal (for Great Crested Newt) are implemented.

However, we note the date of the surveys, and advise you seek the advice of your internal ecological advisers as to whether updated surveys may be sought.

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

Protected Sites

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, i.e. variation of a development which would not increase the occupancy of the development already permitted, and where nutrient impact had previously been assessed, 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

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.

Yours faithfully,

Gareth Thomas
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.