

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

02/05/2023

Dear Sir/Madam,

**BWRIAD / PROPOSAL: ESTYNIAD I'R UNED DDIWYDIANNOL BRESENNOL /
EXTENSION TO EXISTING INDUSTRIAL UNIT**

**LLEOLIAD / LOCATION: JB FABRICATION, BRYN LANE, WREXHAM INDUSTRIAL
ESTATE, WREXHAM**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the additional information for the above, which we received on 18th April 2023.

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

Approved Document: Fuller, L. April 2023 - JB Fabrication Ltd, Bryn Lane, Eitive Ecology Ltd (unpublished)

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

Protected Species

We note that the Preliminary Ecological Assessment (PEA) report submitted in support of the above application (Fuller, L. April 2023 - JB Fabrication Ltd, Bryn Lane, Eitive Ecology Ltd (unpublished)) has identified that protected species are not present at the application site.

However, we note that the PEA report has identified habitats suitable for Great Crested Newts (*Triturus cristatus*) in the vicinity of the application site. This species is protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). We advise that the proposed development

is not likely to harm or disturb Great Crested Newts or their breeding sites and resting places at this site, provided the avoidance measures described in the PEA report are implemented.

The PEA report also identifies that the site is suitable for use by foraging and commuting bats. Bats and their breeding and resting places 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 the population of the species concerned at a favourable conservation status in its natural range.

We note that no information has been submitted in respect of external lighting proposals and therefore advise that your internal ecologist considers any potential impacts on bats and that the recommendations of the PEA 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.

Biosecurity

We consider biosecurity to be a material consideration owing to the location and nature of the proposal. We would therefore welcome any subsequent consent including the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

We advise this assessment includes:

- (i) appropriate measures to control any identified Invasive Alien Species (IAS) Invasive Non-native Species (INNS) on site; and
- (ii) measures or actions that aim to prevent INNS/identified diseases being introduced to the site for the duration of construction (and operational phases) of the scheme.

NRW does not require any further consultation in respect of biosecurity.

Foul Drainage and Protected Sites

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. As part of this package, we issued a [Planning Position Statement](#), in which we advised that any proposed development that might increase the amount of phosphate (or phosphorus) within a river SAC catchment could lead to damaging effects to the SAC. Therefore, such proposals should be screened through a Habitats Regulations Assessment (HRA), to determine whether they are likely to have a significant effect on the SAC.

However, the application as submitted is unlikely to increase the amount of phosphorus entering the catchment. Therefore, we are satisfied that the proposal is not likely to have a significant effect on the River Dee and Bala Lake SAC.

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,

Rachael Burke

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