

Ein cyf/Our ref: CAS-245658-R6Y5
Eich cyf/Your ref: P/2023/0548

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 12 January 2024

Dear Sir/Madam,

**PROPOSAL: CHANGE OF USE OF LIGHT INDUSTRIAL BUILDING AND YARD SPACE
TO PROVIDE STORAGE FACILITY.**

LOCATION: THE WAREHOUSE, BUCK ROAD, COMMONWOOD, WREXHAM, LL13 9TF

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 02 January 2024.

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 to any planning permission granted:

Condition 1: No development shall take place until a GCN Reasonable Avoidance Measures scheme has been submitted to and approved in writing by the Local Planning Authority.

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

Protected Species

We advise that the proposed development is not likely to harm or disturb the GCN or their breeding sites and resting places at this site, provided the condition below will be attached to any planning permission for this scheme

Condition 1: No development shall take place until a GCN Reasonable Avoidance Measures scheme has been submitted to and approved in writing by the Local Planning Authority.

The Reasonable Avoidance Measures (RAMs) shall include, but not necessarily be limited to:

- further details and associated plans concerning amphibian avoidance and mitigation measures including, but not limited to, one-way amphibian fence design and locations (prior to and throughout the duration of any work).
including installation of permanent amphibian fencing into the boundary fence line.

- details of timing, phasing and duration of construction activities and conservation measures;
- a timetable for implementation demonstrating that works are aligned with the proposed phasing of the development; and
- persons responsible for implementing the works.
- Biosecurity measures to be adhered to onsite

The Reasonable Avoidance Measures scheme shall be carried out in accordance with the approved details.

Justification: To ensure that an approved GCN Reasonable Avoidance Measures scheme is implemented, which protects the amphibian assemblage affected by the development.

Provided these avoidance measures are implemented, we consider that the proposed 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:

Please consult us again if the plans are changed in ways that may harm or disturb the GCN or their breeding sites and resting places at this site.

Bats

We note that the bat report submitted in support of the above application (Tyrer Ecological Consultants Ltd (Dec 2023) Updated Inspection and Assessment in relation to Bats, Breeding Birds and GCN) has identified low suitability of roost using the application site and it describes the potential of the buildings for bats as low. However, the report does advise that a single emergence/activity survey when bats are active between May and August. We have no comments to make on the application as submitted and advise that you liaise with your own Authority's ecologist regarding the need for an emergence survey.

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). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our Planning Advice (August 2023), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

However, recognising the specific nature of the application submitted and no proposed foul drainage has been proposed, we are satisfied that it 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.

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.