



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-207360-C2R6
Eich cyf/Your ref: P/2022/1071

Maes Y Ffynnon,
Penrhosgarnedd,
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Ffôn/Phone: 03000 65 3786

10/02/2023

Dear Sarah Hill,

BWRIAD / PROPOSAL: Gosod dwy uned modiwlwr / siting of two storey modular units

LLEOLIAD / LOCATION: Hydro Aluminium Deeside Ltd, Bridge Road, Wrexham Industrial Estate, Wrexham, LL13 9PS

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 23rd January 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:

Document - GCN Method Statement & Biodiversity Enhancements, Etive Ecology, December 2022

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 Great Crested Newt (GCN) report submitted in support of the above application (GCN Method Statement & Biodiversity Enhancements, Etive Ecology, December 2022) has identified that GCN have the potential to be present at the application site. GCN and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

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 avoidance measures described in the GCN report are implemented. The measures in the report should be implemented to ensure 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.

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

Please consult us again if any further information shows that this is no longer a lower risk case.

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. In line with our [Planning Advice](#) (July 2022), 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, i.e. replacement of existing staff welfare facilities, with no increase in the number of employees, as noted within paragraph 20 of the Planning Statement, 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,

Gareth Thomas

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