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Wrexham County Borough Council,
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ebost/email:
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07/12/2021

Annwyl Sir/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: 2 ELM POINT, ABBEY ROAD, NORTH WREXHAM INDUSTRIAL ESTATE

LLEOLIAD / LOCATION: ESTYNIAD I'R IARD GWASANAETH / EXTENSION TO SERVICE YARD

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 16/11/2021.

We continue to have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected species. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Species

Great Crested Newts (GCN)

We note that a new document has been submitted in support of the above application (Vehicle Tracking Proposed Service Yard Extension. Caulmert, 02/11/2021). However, we advise that further information is still required to assess the extent of adverse effects on GCNs. This must demonstrate that the proposed development would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

GCN and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

We note that the application site has previously been subject to derogation. Previous applications demonstrated no likely detriment to the maintenance of the Favourable Conservation Status (FCS) of the local population of GCN.

The conservation status attributes include habitat quality and extent. In our view, the proposals would result in a predicted improvement to the quality of the remaining GCN habitat. Consequently, the proposals would satisfy this component requirement.

However, the proposals would result in a net reduction in the extent of predicted GCN habitat. We therefore advise that consideration is given as to how this reduction in area could be compensated for and that further information, including detailed plans, is provided on how this would be achieved. We advise that this matter is discussed further with the LPA ecologist.

Subject to the above, we also advise that planning conditions on any future consent should include the submission of an updated long-term management and surveillance plan. This should comprise:

- Defined aims and objectives (for each identified ecological feature);
- Management prescriptions for each identified ecological feature;
- Contingency prescriptions if adverse factors such as invasive non-native species colonize the site;
- Skills, competencies and licensing requirements for habitat management and surveillance;
- Long term annual surveillance with results uploaded to the Wales Monitoring database;
- Tenure and any proposed changes to tenure;
- Proposals that regulators can utilize in the event of lack of inappropriate actions being carried out on site;
- Resource provision, and;
- If ownership is retained, details of what would happen in the event of the applicant ceasing trading, including commercial take over or insolvency.

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,

Rhys Jones

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