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Wrexham County Borough Council,  
The Guildhall,  
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northplanning@cyfoethnaturiolcymru.gov.uk

07/01/2022

Dear Sir/Madam,

**PROPOSAL: EXTENSION TO EXISTING STORAGE FACILITIES**

**LOCATION: F S JONES WAREHOUSE, ABBEY ROAD SOUTH, WREXHAM INDUSTRIAL ESTATE, WREXHAM**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales with further information about the above, which we received on 24/12/2021.

**We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching a condition regarding biosecurity to any planning permission granted and if the document identified below is included in the approved plans and documents condition on the decision notice:**

- Cartwright, A. and Norman, K. (2018). Preliminary Ecological Impact Assessment: F S Jones, Abbey Road South, Wrexham Industrial Estate. Amanda Cartwright & Kim Norman. (Unpublished).

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

**Protected Species**

We have reviewed the following submission:

- Cartwright, A. and Norman, K. (2018). Preliminary Ecological Impact Assessment: F S Jones, Abbey Road South, Wrexham Industrial Estate. Amanda Cartwright & Kim Norman. (Unpublished).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 the 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 the bats or Great Crested Newts, or their breeding sites and resting places at this site, provided the avoidance measures described in the Preliminary Ecological Impact Assessment report are implemented.

The ecological 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 nature and location of the proposal. In this case, biosecurity issues concern invasive non-native species and diseases.

Condition: No development with the potential to impact on invasive species, shall commence until a Biosecurity Risk Assessment has been submitted to and approved in writing by the Local Planning Authority. The risk assessment shall include measures to control, remove or for the long-term management of invasive species both during construction and operation. The Biosecurity Risk Assessment shall be carried out in accordance with the approved details.

Justification: To ensure that an approved Biosecurity Risk Assessment is implemented to secure measures to control the spread and effective management of any invasive non-native species at the site.

## **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 21<sup>st</sup> 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.

Yours faithfully,

**Tristan Williams**

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