



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-191207-B6L8
Eich cyf/Your ref: P/2022/0465

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

06/07/2022

Dear Sir/Madam,

BWRIAD / PROPOSAL: AMRYWIO AMODAU 3 (DEUNYDDIAU), 4 (MANYLION Y DRWS), 5 (MANYLION Y FFENESTRI), 7 (CAFNAU DWR AC ATI), 9 (AROLWG LLUNIAU), 12 (TRINIAETH FFIN) A 14 (ECOLEG) CANIATAD CYNLLUNIO P/2017/0748 I GANIATÁU AR GYFER CYFLWYNO AR OL DECHRAU / VARIATION OF CONDITIONS 3 (MATERIALS), 4 (DOOR DETAILS), 5 (WINDOW DETAILS), 7 (RAINWATER GOODS), 9 (PHOTO SURVEY), 12 (BOUNDARY TREATMENT) AND 14 (ECOLOGY) OF PLANNING PERMISSION P/2017/0748 TO ALLOW SUBMISSION POST COMMENCEMENT

LLEOLIAD / LOCATION: CEFN FARM, CEFN ROAD, BWLCHGWYN, WREXHAM, LL11 5YD

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 10th June 2022.

We have concerns with the application as submitted. We do not recommend your Authority varies condition 14 (ecology) for the following reasons.

We have no comments to make in respect of varying conditions 3, 4, 5, 7, 9, and 12.

Condition 14: Ecology

We note that Condition 14 states that "No part of the development shall commence until a scheme for the proposed bat roosting opportunities including the location, type and number of entrance points and a breathable roofing membrane specification have been submitted to and approved by the Local Planning Authority".

However, we understand that bat roosting opportunities and a breathable membrane have been installed in respect of the work completed under planning application P/2017/0748, without prior approval. Modern breathable membranes are known to cause entrapment,

injury and death to bats. Consequently, most modern breathable membranes should not normally be used within structures that function as bat roosts.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and they are classed as a material consideration for planning under the provisions of Technical Advice Note 5: Nature Conservation and Planning (TAN5).

Considering the works that have been undertaken, we advise that further information is submitted in the form of an updated ecological report which:

- confirms the functionality and usage of the site for bats;
- clarifies the extent of the works carried out at the bat roost location;
- includes details about the roofing membrane installed and mitigation measures implemented regarding the bat roost and roosting opportunities provided;
- includes details about how these accord with any applicable species licensing requirements, and;
- provides recommendations for any additional mitigation that may be required to avoid long-term adverse effects on the population of the bat species concerned.

In the absence of the above information, we are unable to give you any assurance that the proposed variation of condition 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.

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