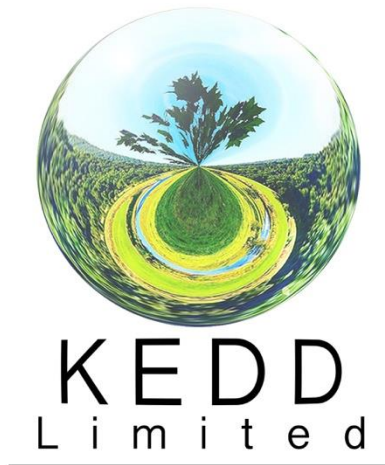




**Ballswood
Habitat Regulations Assessment**

in respect of

***Planning Application For 2No. Changes to the Limits of Extraction within
the Existing Permitted Planning Boundary of Ballswood Quarry***

for

Cheshire and North Wales Sand and Gravel Ltd

Prepared By

Kedd Limited

May 2022

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Revision	Author	Checked by	Date
V1	SP	RS	May 2022

1.0 INTRODUCTION

Baseline Information

- 1.1 Kedd Limited have been commissioned to undertake a Habitat Regulations Assessment (HRA) to determine whether the 2 proposed extensions to the extraction boundary of Ballswood Quarry (hereafter referred to as the site) would have any adverse effects on the integrity of a number of sites designated under the Conservation of Habitats and Species Regulations 2017 (as amended). This is required to respond to NRW's SAC Compliance Assessment which highlights the failures to achieve the phosphate standards of the water quality conditions for SAC designated rivers.
- 1.2 This HRA screening will determine whether the proposed development presents any likely significant effects (LSEs) on the qualifying interests of the River Dee and Bala Lake Special Area of Conservation (SAC) and also whether or not an Appropriate Assessment for adverse effects for these sites will be required.

Request from NRW

- 1.3 The request from NRW states 'We also note the proposal is within the catchment of the River Dee and Bala Lake SAC. As you are aware, on the 21st 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'.
- 1.4 Please see the response from NRW in Appendix 1.

Site Location and Description

- 1.5 Ballswood Quarry is located at Gegin Lane, Wrexham, LL12 0NU, and is one of two active sand and gravel quarries in the County Borough of Wrexham. Ballswood Quarry is operated by Cheshire and North Wales Sand and Gravel Ltd.
- 1.6 The majority of the site is comprised of existing quarry, with areas of scattered scrub and tall ruderal vegetation located around existing soil bunds. The boundaries of the existing quarry are comprised of broad-leaved semi natural woodland and hedgerows.

There are a number of waterbodies located within the existing quarry. The eastern section of the site is comprised of arable fields and heavily grazed improved grassland.

Proposed development

- 1.7 The proposed development involves the 2 extensions which are within the permitted red line boundary of the existing Ballswood Quarry, although outside the extraction area on the approved plans. Access to the site for the purpose of extending mineral extraction from the existing quarry to the west would best be supplied through the existing quarry site. The proposed development will release currently sterilised mineral within the permitted planning boundary of the site.

2.0 THE HABITAT REGULATIONS ENGLAND AND WALES

- 2.1 The Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations') transposes the requirements of European Council Directive 92/43/EEC 'the Habitats Directive' into English law. The Habitats Regulations apply to plans and projects that may have significant effects on sites designated under the Habitats Directive and the Wild Birds Directive (Council Directive 79/409/EEC). Sites designated under the Directives include Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).
- 2.2 Prescribed 'Competent Authorities' must assess plans and projects for their potential to cause Likely Significant Effects (LSE) on the above designated sites. Should LSE be identified by the initial screening process, it is necessary to further consider the effects by way of an 'Appropriate Assessment' (AA). Where the plan or project may lead to LSE, it must be subject to an AA to determine whether there will be adverse effects to any such sites. Any plan or project that would lead to adverse effects on the integrity of these site(s) cannot be permitted without meeting strict additional tests.
- 2.3 Overall, this process of assessment is known as Habitats Regulations Assessment and further details of the applicable legislative context are summarised below.
- 2.4 Following the UK's exit from the European Union (EU), The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 has resulted in amendments to the Habitats Regulations. Defra guidance (2021) states that Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:
- Existing SACs and SPAs; and
 - New SACs and SPAs designated under these Regulations.
- 2.5 Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new national site network. Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:
- Fulfil the commitment made by government to maintain environmental protections; and

- Continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.

2.6 It is also a matter of government policy that Ramsar sites are considered in the HRA process, as described in part 181 of the National Planning Policy Framework. Where it is anticipated that a development could affect the integrity of a Special Protection Area (SPA), Special Area of Conservation (SAC) or Ramsar site, either individually or cumulatively with other development, a Habitat Regulation Assessment under the Habitats Regulations will be undertaken. If adverse impacts on the integrity of the site and its qualifying features are predicted, measures to mitigate for these effects will be implemented. If it is not possible to mitigate satisfactorily for adverse effects, the development will not be permitted. If there is no alternative solution, the consideration of imperative reasons of overriding public interest (IROPI), despite a potentially negative effect on site integrity, can be considered.

2.7 This report presents information to enable the screening assessment required as part of Stage 1 of the HRA process, to establish whether or not the proposed scheme will have any LSE upon the national site network and Ramsar sites.

3.0 STAGES OF HABITAT REGULATIONS ASSESSMENT

3.1 Guidance on the Habitats Directive (European Commission, 2000) sets out the staged approach that should be followed to enable Competent Authorities to discharge their duties under the Habitats Directive and provides further clarity on the interpretation of Articles 6 (3) and 6 (4). The process used is usually summarised in four distinct stages of assessment:

3.2 Stage 1: Screening - the process that identifies whether effects upon a habitat site as a consequence of a plan or project are possible, either alone or in combination with other plans or projects, and considers whether these effects are likely to be significant;

3.3 Stage 2: Appropriate Assessment - the detailed consideration of the effect on the integrity of the habitat site as a consequence of the plan or project, either alone or in combination with other plans or projects, with respect to the site's conservation objectives and its structure and function;

3.4 Stage 3: Assessment of alternative solutions - the process that examines alternative ways of achieving the objectives of the plan or project that avoid adverse effects on the integrity of the Habitats site; and

3.5 Stage 4: Assessment where no alternative solutions exist and where adverse effects remain - an assessment of whether the development is necessary for IROPI and, if so, of the compensatory measures needed to maintain the overall coherence of the Habitats site.

Guidance

3.6 Department for Communities and Local Government (August 2006) Planning for the protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents. Draft.

3.7 European Commission (2000a). Managing Natura 2000 Sites, the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. Available online: http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf. Accessed [09/12/2021]

3.8 European Commission (2000b). Communication from the Commission on the Precautionary Principle;

- 3.9 European Commission (2018). Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC; and
- 3.10 Joint Nature Conservation Committee (JNCC) (2016). SAC and SPA Standard Data Forms and Ramsar Information Sheets. Available online: <http://www.jncc.gov.uk/>. Accessed [09/12/2021].

HRA Policy

- 3.11 Council of the European Union (1992). Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora. Available online: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:31992L0043>. Accessed: [09/12/2021];
- 3.12 Council of the European Union (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. Available online: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=URISERV:ev0024>. Accessed: [09/12/2021];
- 3.13 European Communities (2007). Guidance document on Article 6 (4) of the 'Habitats Directive' 92/43/EEC; Available online: http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance_art6_4_en.pdf Accessed: [09/12/2021]; and Her Majesty's Stationery Office (2017). The Conservation of Habitats and Species Regulations 2017/490.
- 3.14 This report (the 'HRA Screening Report') details the HRA Stage 1 Screening Assessment.

4.0 ECOLOGICALLY DESIGNATED SITES – DESK STUDY

- 4.1 The River Alyn is located approximately 240m to the south of the site and is a tributary of the River Dee.
- 4.2 The NRW citation for the River Dee and Bala Lake SAC states ‘The River Dee has its source in Snowdonia at the outflow of Llyn Tegid and it includes the Ceiriog, Meloch, Tryweryn and Mynach tributaries. Its catchment contains a wide spectrum of landscape from high mountains around Bala, rugged peaks near Llangollen, steep sided wooded valleys, and the plains of Cheshire, Flintshire, north Shropshire and Wrexham. There is a tidal influence as far upstream as Farndon and high tides regularly exceed the Chester weir crest level.
- 4.3 The course and topography of the River Dee/ Afon Dyfrdwy has been largely influenced by glaciers. Below Bala Lake and down to Chester the River Dee/ Afon Dyfrdwy flows over predominantly sedimentary bedrock consisting of mudstones, sandstones and siltstones. These range from the Silurian to Triassic periods with progressively younger underlying bedrock with distance downstream. The catchment of the Dee above Bala gauging weir is predominantly comprised of impermeable Cambrian and Ordovician rocks overlain with thin, semi-permeable soil. The river flows east through Llangollen where there are Carboniferous limestone outcrops and coal measures.
- 4.4 The aquatic plant community includes Wirtgen’s water-crowfoot (*Ranunculus x bacchii*) and pond watercrowfoot (*R. peltatus*), and also floating water-plantain (*Luronium natans*). Water-crowfoot forms extensive beds along the whole length of the Dee where flow conditions are suitable. Other aquatic plants which occur within the site include intermediate water-starwort (*Callitriche hamulate*), alternate-flowered watermilfoil (*Myriophyllum alterniflorum*) and bryophytes including *Rhynchostegium riparoides* and *Fontinalis antipyretica*. Marginal vegetation consists mainly of reed canary-grass (*Phalaris arundinacea*) with occasional branched bur-reed (*Sparganium erectum*).
- 4.5 The River Dee is recognised as one of North Wales’ premier rivers for Atlantic salmon (*Salmo salar*). The Mynach, Meloch and Ceiriog tributaries are the most important salmon spawning tributaries in the Dee catchment. Other migratory fish utilising the river system include river lamprey (*Lampetra fluviatilis*) and sea lamprey (*Petromyzon marinus*). The Dee also supports important populations of non-migratory fish including

bullhead (*Cottus gobio*) and brook lamprey (*Lampetra planeri*). The otter (*Lutra lutra*) is well established throughout the river system, especially where appropriate bank side cover exists. The SAC is underpinned by two SSSIs divided by the national boundary; the Afon Dyfrdwy (River Dee) SSSI and the River Dee (England) SSSI. The Welsh SSSI includes the upper part of the main stem Dee, Afon Mynach, Afon Meloch, Afon Tryweryn and the upper part of the River Ceiriog (except the headwaters). The English SSSI includes the lower part of the main stem Dee and the lower part of the River Ceiriog. The site is also situated within the Shropshire, Cheshire and Stafford Plain National Character Area'.

5.0 EFFECTS ON DESIGNATED SITES

- 5.1 The site is located approximately 240m to the north of the River Alyn. No works as part of this planning application are to directly discharge into the River Alyn. The planning application largely covers the existing footprint and it is proposed that the base of extraction in the 2 proposed changes to the extraction area are to be no deeper than 25 maOD i.e. the quarry is to be worked dry. In addition, the following mitigation measures including a Surface Water Management Plan and Pollution Prevention Measures plan have been provided which form part of the Planning Application documents (attached to the planning statement). As a result, it is not anticipated that there will be any additional impacts on the River Alyn.
- 5.2 The NRW response states 'However, recognising the specific nature of the proposal, 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'.
- 5.3 As a result, it is therefore considered that no further assessment is required to assess the impacts on the proposed developments in relation to any potential impacts for the River Dee and Bala Lake SAC'.
- 5.4 It is also assessed that the proposed works will have no impact on any other Statutory Designated sites within 2km of the site boundary.

6.0 CONCLUSIONS

- 6.1 Kedd Limited have been commissioned to undertake a Habitat Regulations Assessment (HRA) assessment to determine whether the proposed extraction at Ballswood Quarry would have any significant impacts on the River Dee and Bala Lake SAC.
- 6.2 The request from NRW states 'We also note the proposal is within the catchment of the River Dee and Bala Lake SAC. As you are aware, on the 21st 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'.
- 6.3 The NRW response states 'However, recognising the specific nature of the proposal, 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'.
- 6.4 As a result, it is therefore considered that no further assessment is required to assess the impacts on the proposed developments in relation to any potential impacts for the River Dee and Bala Lake SAC'.

7.0 REFERENCES

1. CIEEM (2018). Guidelines for Ecological Impact Assessment in the United Kingdom. CIEEM, 2018.
2. Council of the European Union (1992). Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora. Available online: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:31992L0043>. Accessed: [27/11/2021]
3. Council of the European Union (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. Available online: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=URISERV:ev0024>. Accessed: [27/11/2021]
4. Department for Housing, Communities and Local Government (DHCLG) (2021). National Planning Policy Framework.
5. European Communities (2007). Guidance document on Article 6 (4) of the ‘Habitats Directive’ 92/43/EEC; Available online: http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance_art6_4_en.pdf Accessed: [27/11/2021]
6. Her Majesty’s Stationery Office (2017). The Conservation of Habitats and Species Regulations 2017/490.
7. Joint Nature Conservation Committee (JNCC) (2016). SAC and SPA Standard Data Forms and Ramsar Information Sheets. Available online: <http://www.jncc.gov.uk/>. Accessed 22 November 2021.

Appendix 1 –Response from Natural Resources Wales (NRW)



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-183525-X2D0
Eich cyf/Your ref: ENQ/2021/0316

Maes Y Ffynnon,
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29/03/2022

Dear Sir/Madam,

STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.

PROPOSAL: Two proposed extensions to the extraction boundary of Ballswood Quarry utilising existing quarry infrastructure and access (the proposed development will release currently sterilised mineral within the permitted planning boundary of the site)

LOCATION: Ballswood Quarry, Wrexham

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 04/03/2022 (and the full set of supporting information on 09/03/2022).

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding groundwater and protected species (bats). If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

We also advise that based on the information submitted to date, we would ask the planning authority to include a condition regarding protected species (amphibians) on any planning permission granted. Without the inclusion of this condition by the planning authority we would be likely to object to the planning application.

Groundwater

We have reviewed the following document:

- Planning Statement Planning Application for 2No. Changes to the Limits of Extraction within the Existing Permitted Planning Boundary of Ballswood Quarry *Relating to Planning Permission ref. P/2016/0110* at Ballswood Quarry, off Gegin Lane, Llay, Wrexham LL12 0NU. Kedd Limited, February 2022 (including Appendix 2 – Groundwater)

The proposed sand and gravel operations are overlying a Principal and Secondary A aquifer and are located within a Source Protection Zone 3 for a public water supply. We therefore consider the site to be sensitive with respect to controlled waters (including groundwater) and advise that further site investigation (monitoring) and assessments should be completed to inform the planning application. Any assessment should consider this sensitive setting.

The maximum recorded water level in the last 18 months (August 2020 to January 2022) was 23.8m AOD at WM2 in February 2020; this was 1.2m below the proposed quarry base. We therefore acknowledge that excavation of the minerals will be above the local water table and will not require dewatering.

However, we advise that the planning application should be supported by the following further information:

- Water Management Plan – this should consider the surface water drainage and disposal around the site and any dewatered groundwater.
- Pollution Prevention Measures – details and method statements to prevent pollution entering the controlled waters.

Protected Species

We have reviewed the following documents:

- Anon. (2021) Ballswood Preliminary Ecological Appraisal [PEA] in respect of Planning Application For 2No. Changes to the Limits of Extraction within the Existing Permitted Planning Boundary of Ballswood Quarry. Heatons. (Unpublished)
- Anon. (2021). Ballswood Protected Species Surveys: eDNA Surveys in respect of Planning Application For 2No. Changes to the Limits of Extraction within the Existing Permitted Planning Boundary of Ballswood Quarry. Heatons. (Unpublished)
- Anon. (2020). Ballswood Bat Survey Report in respect of Planning Application For 2No. Changes to the Limits of Extraction within the Existing Permitted Planning Boundary of Ballswood Quarry. Heatons. (Unpublished).

Bats

We note that the PEA report submitted in support of the above application has identified that bats are present at the application site. From the information submitted, we consider that the proposed development is likely to represent a higher risk for bats, as defined in our guidance document '*Natural Resources Wales Approach to Bats and Planning (2015)*'. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

Although the PEA (2021) and Bat Survey Report (2020) have been submitted, we advise that there is insufficient information to assess potential effects on bats, and how any effects will be avoided or mitigated.

We advise that further information (in keeping with the recommendation from the PEA quoted below in italics) is submitted with the application to assess the extent of adverse effects on the bats and any avoidance or mitigation measures required. 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.

...it is recommended that bat roost surveys are undertaken in order to identify the presence or absence of bats within this tree. This will involve two emergence / re-entry survey visits, with at least one of these surveys conducted at as a dawn re-entry survey. Bat Surveys can be conducted from May - September.

In the meantime, we are unable to give you any assurance that the proposal 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.

Great Crested Newt (GCN)

We have reviewed the PEA and the GCN eDNA surveys both dated December 2021 (references above). However, we note that eDNA surveys were not carried out in ponds 5, 6, 7 and 8. We note the comments regarding habitat suitability in Section 4.13 of the eDNA survey report but advise that a number of nationally important populations of GCN have been recorded in quarries, many of which have exhibited sparse vegetation (terrestrial and aquatic). Given this uncertainty we would advise that the LPA considers including an amphibian surveillance condition to any planning permission granted.

Condition: No development shall commence until an amphibian Conservation Plan covering operation and post-operation has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan shall include, though not necessarily be limited to, the following:

- Details of protective measures to be taken to minimise the impacts during operation.
- Details of timing/phasing and duration of activities.
- Submission of a long-term site management plan that includes:
 - defined aims and objectives;
 - habitat management prescriptions;
 - contingency measures if fish or invasive non-native species (INNS) are detected;
 - proposals that are capable of being implemented in the event of failure to undertake or to appropriately implement identified or contingency actions; site liaison and wardening;
 - surveillance based on the methodology of results reported through the online Wales GCN Monitoring Scheme;
 - licensing requirements for undertaking habitat management and surveillance;

- current and any proposed changes to tenure of the compensation area;
- persons or bodies responsible for undertaking management and surveillance together with required skills and competencies;
- reporting requirements; and
- proposed dates for updating or revising the management plan.
- Reporting of the results of Ecological Compliance Audits.
- Details of measures to prevent or reduce incidental capture injury or killing.

The Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that an approved amphibian Conservation Plan is implemented which protects amphibians affected by the proposals.

Protected Sites

Sites of Special Scientific Interest (SSSI)

The application site is:

- adjacent to Chwarel Singret SSSI; and
- 80m from Marford Quarry SSSI.

We have considered the information submitted in support of the above application. Based on the information submitted, we consider that the proposed development is not likely to damage the features for which the above sites are of special interest.

Modifications to the scheme as currently proposed may affect our view and may merit a further consultation with us.

Please note that Ballswood Quarry has some connectivity with the adjacent Chwarel Singret SSSI and there may be potential impacts on Environment (Wales) Act Section 7 species. Ballswood Quarry itself may be important for Psammophilic¹ invertebrates as sand quarries provide ideal habitats for invertebrate species associated with sand and with early-successional habitats such as bare and partially vegetated ground, pioneer and ruderal plant communities, and scrub. Key invertebrate groups associated with sand quarry habitats include beetles (ground beetles, phytophagous species), flies (robberflies, soldierflies, hoverflies, picture-winged flies), aculeate bees and wasps, heteropteran bugs, moths and spiders. There would be an additional suite of species associated with hydrological features such as shallow pools, seepages, small stands of reeds and other emergents if these habitats are present. This rich variety of habitats also offers a heterogeneous landscape, critical to the life cycles of many invertebrates.

We therefore advise that appropriate restoration of the site is discussed with the LPA's ecologist. We would advise that restoration of the site should be focused on providing suitable habitat for invertebrate species associated with sand and early-successional

¹ organisms that prefer or thrive in sandy soils or areas.

habitats with the continued ground disturbance associated with quarrying activity in the creation of open and bare areas.

River Dee and Bala Lake Special Area of Conservation (SAC)

We also note the proposal is within the catchment of the River Dee and Bala Lake SAC. As you are aware, on the 21st 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, recognising the specific nature of the proposal, 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.

Flood Risk

The proposed extension areas A and B as defined on drawing number KD.BLWQ.2.D.005 are located in flood zone A of the Development Advice Maps contained in TAN15 and therefore are not at risk from fluvial flooding. We therefore have no further comments to make regarding this.

Wrexham County Borough Council drainage department in their capacity as lead local flood authority may be able to advise on any local problems in relation to surface water disposal and any associated flood risk.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

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.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

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