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Wrexham County Borough Council,
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ebost/email:
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30/03/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: DISCHARGE OF CONDITIONS 4 (WINDOW AND DOOR DETAILS), 8 (LANDSCAPING), 18 (PHOTOGRAPHIC SURVEY), 16, 20, 21 AND 24 (ECOLOGY) OF PLANNING PERMISSION P/2021/0604

LLEOLIAD / LOCATION: Lower Farm, Lower Farm Road, Bowling Bank, Wrexham, LL13 9RY

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 14th March 2022.

We have concerns with the application as submitted. We do not recommend your Authority discharges conditions 20, 21 and 24 for the following reasons. We have no objection to the discharge of condition 16, and have no comments to make with respect to conditions 4, 8 and 18

Protected Species

The applicant has submitted an ecological report (reference Courtley, J. (2022). Ecological Mitigation, Management and Enhancement Plan Barn at Lower Farm (Plot 6), Bowling Bank, Wrexham, LL13 9RY. Arbtec. (Unpublished)).

Condition 20 - Condition 20 states No part of the development shall commence until an external bat-friendly lighting scheme has been submitted to, and approved in writing by, the Local Planning Authority.

The submission concerning external lighting, in our view, do not accord with the requirements of this condition. No detail has been provided in respect of foraging/dispersal routes together with plans illustrating the types and locations of external lighting. We advise that such information will be needed before condition 20 may be discharged.

Condition 21 - Condition 21 states: No part of the development shall commence until a site wide Biosecurity Risk Assessment has been submitted to and approved in writing by the

Local Planning Authority. The risk assessment shall include measures to control or remove invasive species both during construction and operation.

The submission does not, in our view, include a satisfactory biosecurity risk assessment, as no measures for the control or removal of invasive species have been identified. This information should be provided as part of a Biosecurity Risk Assessment

Condition 24 - Condition 24 states No part of the development shall commence until full details of bat mitigation measures, including timescale for implementation of these measures, have been submitted to, and approved in writing by, the Local Planning Authority.

The submission outlines possible bat mitigation measures. However, the provisions of this condition require details of mitigation together with identified timescales. We therefore consider the ecological submission does not accord with the requirements of this condition.

Condition 16 - Condition 16 states “No part of the development shall commence until details of the proposed Reasonable Avoidance Measures (RAMs) have been submitted to and approved in writing by the Local Planning Authority”.

In our view the ecological submission accords with the requirements of this condition. We are therefore satisfied that condition 16 may be discharged. However, we would welcome the inclusion of the construction of a one-way barrier fence around the perimeter of the working area from an “avoidance” perspective.

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

Gareth Thomas

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