



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-177750-F5Y1
Eich cyf/Your ref: P/2021/1181

Maes Y Ffynnon,
Penrhosgarnedd,
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Wrexham County Borough Council,
The Guildhall,
Wrexham,
LL11 1AY

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

30/12/2021

Dear Sir/Madam,

PROPOSAL: DISCHARGE OF CONDITION 10 (ECOLOGY) OF PLANNING PERMISSION P/2020/0732

LOCATION: BRONYDD, QUARRY ROAD, GLYN CEIRIOG, WREXHAM, LL20 7DA

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 15/12/2021.

We have concerns with the application as submitted. We do not recommend your Authority fully discharges condition 10 for the following reasons.

Protected Species

In summary, we consider that the submitted conservation plan satisfactorily considers a number of the component provisions of the Condition 10 of planning permission P/2020/0732. However, not all component provisions appear to have been considered as part of the conservation plan submission. In these circumstances we consider it to be premature to discharge Condition 10. Please find our detailed comments below (quoting the component parts of the condition concerned in italics).

Build upon the principles outlined in the ecological report (Cutmore, S. (2020). Building at Bronydd, Quarry Road, Glyn Ceiriog, Llangollen- Building Development: Protected Species Surveys. Stephen Cutmore Arboricultural and Ecological Services Limited.);

We have no specific comment in relation to this aspect.

Submission of further details including plans of proposed compensation measures;

We note and welcome the proposed mitigation proposals. In terms of detail, we suggest that in respect of pipistrelle species, access along soffits/barge boards is also provided. We also suggest that provisions confirm the detail of proposed mitigation measures. We note no detail plans have been provided in respect of proposed compensation measures.

We note limited consideration of long-term issues including any possible future changes to tenure. Consideration could be given to the use of restrictive covenants.

Submission of further details concerning bat avoidance and mitigation measures;

We consider the submission to be satisfactory in respect of bat avoidance measures.

Details of timing, phasing and duration of construction activities and conservation measures;

Timetable for implementation and demonstrating that works are aligned with the proposed phasing of the development;

No detail has been provided in relation to these points.

*Measures to prevent incidental capture or killing of bats post development;
Actions to be taken in the event that previously unidentified species of bat are found;*

We consider the submitted conservation plan satisfactorily considers this component provision.

Ecological Compliance Audit, including key performance indicators;

We welcome the submission. However, we note that Key Performance Indicators have not been included in the report. We therefore consider it to be premature to discharge this component provision.

Persons responsible for implementing the works;

We consider the submitted conservation plan satisfactorily considers this component provision.

Post-construction monitoring and record dissemination for a period of not less than 2 years;

We consider the submitted conservation plan satisfactorily considers this component provision.

Further details of the outlined external lighting and internal light spillage scheme; together with plans illustrating projected bat emergence points and dispersal

corridors between bat roost access points and features planned to be functionally used by bats for foraging/dispersal purposes.

We consider submitting lighting proposals to be satisfactory, although we would have welcomed the inclusion of plans as specified in the condition.

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.

Yours faithfully,

Tristan Williams

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