



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-168722-G0K2
Eich cyf/Your ref: P/2021/0788

Maes Y Ffynnon,
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29/10/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: ESTYNIAD DEULAWR I OCHR YR EIDDO AC ESTYNIAD UNLLAWR I OCHR A CHEFN YR EIDDO / TWO STOREY SIDE EXTENSION PLUS A SINGLE STOREY SIDE AND REAR EXTENSION

LLEOLIAD / LOCATION: CARTREF, BEDWELL ROAD, CROSS LANES

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 09/10/2021.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding Protected Species. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Species

Bats

We note that the ecological report submitted in support of the above application (Reid, M. (October 2021). Preliminary Ecological appraisal and Preliminary Roost Assessment Survey: Cartref, Bedwell Road, Cross lane, Wrexham, LL13 0TS. Arbtec) has identified that bats are present at the application site. From the information submitted, we consider that the proposed development is likely to be a lower risk for bats, as defined in our guidance document '*Natural Resources Wales Approach to Bats and Planning (2015)*'. However, we advise that the bat report has insufficient information to assess the need for avoidance / mitigation measures at this stage. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

We agree with the recommendations made within the report in regard to additional emergence surveys required onsite. These surveys should be submitted in support of the

planning application for the site and should detail all of the avoidance and mitigation measures required.

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 Newts (GCN)

We note the assessment in regard to the potential for these proposals to impact on GCN in the vicinity. We agree with the need for the implementation of Reasonable Avoidance Measures (RAMS). Given the additional survey requirements detailed above, we would recommend the details of RAMS required for GCN are provided prior to consent being granted to minimise the need for conditions. These should build on the principles outlined in the submitted ecological report.

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 (INNS) and diseases.

We therefore advise that a Biosecurity Risk Assessment is submitted to the satisfaction of the LPA. We consider that this assessment must include:

- appropriate measures to control any INNS on site; and
- measures or actions that aim to prevent INNS being introduced to the site for the duration of construction and operational phases of the scheme

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 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, 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.

Advice for the Developer

All works at the site must be carried out in accordance with PPG6: 'Working at construction and demolition sites' which are available on the following website:

<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

The activity of importing waste into the site for use as, for example hardcore, must be registered with Natural Resources Wales as an exempt/permittable activity under the Environmental Permitting Regulations 2016. The developer should contact Natural Resources Wales to discuss the necessity for an exemption/permit for any material imported to and exported from the site.

If during construction/excavation works any contaminated material is revealed, then the movement of such material either on or off site should be done in consultation with Natural Resources Wales. Any waste excavation material or building waste generated in the course of the development must be disposed of satisfactorily and in accordance with Section 34 of the Environmental Protection Act 1990. Carriers transporting waste from the site must be registered waste carriers and movement of any Hazardous Waste from the site must be accompanied by Hazardous waste consignment notes.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Tomos Hughes

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