

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

24/02/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: EXTENSION TO INDUSTRIAL UNIT

LLEOLIAD / LOCATION: PROSERVE, ASH ROAD, NORTH WREXHAM INDUSTRIAL ESTATE

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 07/02/2021

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

Great Crested Newt (GCN)

We note that the ecological report submitted in support of the above application (Preliminary Ecological Appraisal Site on Ash Road North, Wrexham Industrial Estate, North Wales LL13 9JT. Arbtech. 14/12/2021) has identified that GCN may be present at the application site. GCN and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

Although the report has been submitted, we advise that there is insufficient information to assess potential effects on GCN, and how any effects will be avoided or mitigated.

We advise that further information is required to assess the extent of adverse effects on GCN, 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.

There are numerous records of GCN in Wrexham Industrial Estate and its environs are considered to be of national importance for its populations of great crested newts. However, we note that no attempt has been made to collate existing information from the NBN and the local records centre (Cofnod). Consequently, existing information concerning GCN in the adjacent areas is not included in the ecological report.

We advise that further information is required including

- Further survey and assessment of GCN
- Reasonable Avoidance Measures in respect of GCN
- Mitigation/Compensation Measures in respect of GCN
- Measures required to prevent or reduce accidental capture or killing [i.e., amphibian friendly surface water management scheme]

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.

Bats

We note that the ecological report submitted in support of the above application (Preliminary Ecological Appraisal Site on Ash Road North, Wrexham Industrial Estate, North Wales LL13 9JT. Arbtech. 14/12/2021) has identified that bats may be present at the application site. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

Although the report has 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 is required 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.

We advise that bats have previously been found in industrial buildings in the Wrexham Industrial Estate. Consequently, from the information provided we do not consider bat survey and assessment to be satisfactory.

We note that no attempt has been made to collate existing information from the NBN and the local records centre (Cofnod). Consequently, existing information concerning bats in the adjacent areas is not included in the ecological report

We advise that further information is required including

- Further survey and assessment of Bats.

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.

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.

Yn gywir / Yours faithfully

Rhys Jones

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