



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-177405-X0V9
Eich cyf/Your ref: P/2021/1161

Maes Y Ffynnon,
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05/01/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: PROPOSED NEW BIN STORE TO COMPLY WITH FIRE REGULATIONS

LLEOLIAD / LOCATION: NEW FOUNDRY BUILDINGS, GUTTER HILL, JOHNSTOWN, WREXHAM, LL14 1LS

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 13/12/2021.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Condition: Biosecurity

We also advise that based on the information submitted to date, the document identified below should be included in the approved plans and documents condition on the decision notice.

- **Amphibian Species Risk Assessment & Method Statement: New Foundry Buildings, Wrexham. Applied Ecological Services, 2021**

Without the inclusion of this condition and document we would object to this planning application.

Protected Species

Great Crested Newt

We note the submission of an ecological survey and assessment (Amphibian Species Risk Assessment & Method Statement: New Foundry Buildings, Wrexham. Applied Ecological Services, 2021) in support of this application. We consider the survey and assessment to be satisfactory for the purposes of informing the public decision-making process.

The report must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

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 any consent includes the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA.

We advise that this assessment must include :

- (i) appropriate measures to control any INNS on site; and
- (ii) 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

Special Area of Conservation (SAC)

From the information provided, NRW consider that the proposals may affect the Johnstown Newt Sites SAC. The application is located adjacent to the SAC.

NRW have identified the following potential impact pathways to features of this site:

1. Death/injury/disturbance of GCN.
2. invasive non-native species and diseases.

The above pathways may not result in an adverse effect if the following measures are adhered to/implemented:

1. developer adheres to the mitigation/avoidance measures outlined in the Ecological Report
2. Submission and implementation of a Biosecurity Risk Assessment.

No assessment of likely significant effect under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) has been undertaken by your authority or it has not been forwarded to NRW for consideration. Should you conclude that

the proposed development is likely to have a significant effect on the European site, we look forward to being re-consulted. In the absence of this assessment, NRW cannot offer assurances that the proposals would not result in an adverse effect upon the SAC.

Site of Special Scientific Interest (SSSI)

NRW consider the proposals have the potential to impact upon the Stryt Las a'r Hafod SSSI. Providing the impact pathways referenced above for the SAC are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded.

Landfill

According to our records the proposed development site is located on land that has been used for the deposition of waste material. We would therefore advise you to consult with the local authority's Environmental Health and Building Control Departments, as they may hold detailed records, and may wish to make appropriate recommendations in respect of landfill gas investigation/remedial work. The developers should be made aware of the existence of the landfill site(s) so that they can decide whether or not to make their own investigations into the presence of landfill gas. It should also be noted that Waste Management Paper 27 states "It has been found that many sites which have taken only supposedly 'inert' waste have produced gas".

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,

Rhys Jones

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