

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

07/09/2021

Annwyl Syr/Madam / Dear Sir/Madam,

PROPOSAL: DISCHARGE OF CONDITIONS 3 (CONTAMINATION), 5 (ARCHAEOLOGY), 6 (ECOLOGY), 7 (DUST MANAGEMENT) AND 8 (MATERIALS) OF PLANNING PERMISSION P/2020/0844

LOCATION: LAND OFF HIGH STREET, JOHNSTOWN LL14 2BA

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 20/08/2021

We have concerns with the application as submitted. We do not recommend your Authority discharges condition 6 for the following reasons.

Protected Species

Great Crested Newts (GCN)

We note the applicant has submitted the following document: Updated Layout, Reasonable Avoidance Measures, with Respect to Great Crested Newts and Biosecurity at land off High St/Ruabon Rd, Johnstown, Wrexham. Susan Worsfold; 09/08/2021.

We note the frequent use of the word “should” in the proposed provisions of the RAMS and Biosecurity Risk Assessment, which means component provisions are unlikely to be enforceable from a regulatory perspective.

We note that there is no apparent consideration of amphibian fencing.

We note the section on Legislation does not include the Invasive Alien Species (Enforcement and Permitting) Order 2019.

The assessment does not consider any Invasive Non-native Species (INNS) that have been recorded in the environs of the application site.

The assessment does not consider the amphibian Chytrid fungus that has been recorded at Johnstown.

For the above reasons, we consider the submission to be unsatisfactory.

We have no comments to make on the discharge of conditions 3 (contamination), 5 (archaeology), 7 (dust management) and 8 (materials) of planning permission P/2020/0844 as we did not advise these conditions in our original substantive response (18/01/2021).

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.

Yours faithfully,

Rhys Jones

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