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ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

27/07/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: RESERVED MATTERS PURSUANT TO OUTLINE PLANNING PERMISSION P/2020/0167 (APPEARANCE, LANDSCAPING AND SCALE) - ERECTION OF STORAGE AND DISTRIBUTION WAREHOUSE

LLEOLIAD / LOCATION: LAND SOUTH OF RIDLEYWOOD LANE AND EAST OF BRYN LANE, WREXHAM INDUSTRIAL ESTATE, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the additional information on the above, which we received on 30/06/2021

We continue to 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 European Protected Species. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Species

We note that a report has been submitted in support of the above application (Landscape and Ecological Management Plan. The Environment Partnership (July 2021).

Although a Landscape and Ecological Management Plan has been submitted, we advise that there is insufficient information to assess potential effects on Great Crested Newts (GCN), and how any effects will be avoided or mitigated.

Further information is needed to assess the extent of adverse effects on Great Crested Newts 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.

Our detailed comments on the Landscape and Management Plan are as follows:

Section 1.9

- We note the proposed habitat area to be provided for GCN and query whether this is available as a GIS layer. We advise that this is provided to WCBC, NRW and the local record centre (Cofnod).

Section 2.10

- We advise that the population targets for GCN as a feature of the site are defined. We suggest that a provisional target of 30 individuals counted by visual observation surveys is set for the site.

Section 4: Woodland

- We advise that the provision of standing deadwood is included.
- Timber removal and EPS licensing is not satisfactorily considered.

Section 4: Hedgerows

- 4.72: This activity is potentially licensable, and avoidable.
- Habitat management – No effective consideration of EPS licensing requirements has been given.

Section 5: Monitoring and Review

- We advise that monitoring accords with and is reported through the [Wales GCN Monitoring scheme](#); this means that monitoring would be abundance-based.
- We advise that marker posts with pond numbers are placed by each pond.

The following information appears to be missing from the document:

- Contingency measures regarding invasive non-native species colonizing the site.
- The skills, competencies and EPS licences required for identified actions.
- Clarification of what would happen in the event of no, or inappropriate actions being carried out.
- Financial resource provision.
- Site tenure and Access. Clarification of what would happen in the event of corporate take-over, loss of trading, insolvency etc.

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