

Maes Y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd
LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

26/04/2021

Annwyl Syr/Madam / Dear Sir/Madam,

**BWRIAD / PROPOSAL: RHYDDHAU AMOD 14 (CYNLLUN CADWRAETH) CANIATAD
CYNLLUNIO P/2019/0716 / DISCHARGE OF CONDITION 14 (CONSERVATION PLAN)
OF PLANNING PERMISSION P/2019/0716**

**LLEOLIAD / LOCATION: LAND ON OAK REDWITHER ROAD, WREXHAM INDUSTRIAL
ESTATE, WREXHAM**

**We have significant concerns with the application as submitted. We do not
recommend your Authority discharges condition 14 for the following reasons.**

Submission of a conservation plan

The applicant has submitted a Method Statement in support of an application to discharge condition 14 of the above planning permission (Reference: Miletto, R. (2021). Method Statement: Oak Road, Wrexham. Ecotec. Unpublished).

Our comments on the submitted method statement are as follows and refer to the individual bulleted components of Condition 14.

- **The submission and implementation of an appropriate avoidance and mitigation scheme.**
We consider the avoidance/mitigation measures to be satisfactory in principle. However, in terms of detail, we advise that a barrier fence is constructed along the northern boundary of the proposed development site or further evidence is presented about how and why GCNs will be prevented from entering the proposed development site from the north throughout the construction phase of the project.
- **The submission and implementation of an on- or offsite compensatory or off-setting scheme.**

We note the proposed 'compensatory' conservation action plan. We advise that the conservation plan is updated to include a habitat loss and gains table to inform proposed conservation measures. Without prejudice to the above, given the extent of proposed works and proximity of Pond 1 to the development site, we advise that an offsite conservation proposal be submitted.

- **A management plan that includes provisions concerning long-term management, wardening and surveillance. This submission to include consideration of resources required to implement surveillance, management and wardening prescriptions. Long term surveillance of the amphibian population to be based on the online Wales GCN monitoring scheme <https://www.cofnod.org.uk/LinkInfo?ID=7>**

No detailed management plan for boundary habitats has been proposed. We advise that this is submitted as an attachment to the method statement.

- **Details of measures designed to prevent the accidental capture/killing of GCN post construction. This is essentially the design and construction of an amphibian friendly surface water management system.**

We advise that further information is supplied in respect of this specific requirement. This detail should focus on the proposed surface water management scheme for the proposed development site. We advise that surface water management schemes do not include gullypots.

- **Biosecurity Risk Assessment: The risk assessment shall include measures to control, remove or for the long-term management of invasive species both during construction and operation.**

We consider this component submission to be satisfactory.

- **Ecological Compliance Audit to evidence compliant implementation of all ecological avoidance, mitigation and compensation works, either proposed or subject to the provisions of reserved matters conditions. The Audit shall identify Key Performance Indicators that are to be used for the purposes of assessing and evidence compliance.**

We consider this component submission to be satisfactory.

Conclusion

The overall submission satisfactorily addresses a number of component issues in respect of Condition 14. However, the submission is not satisfactory in respect of all component provisions of the condition. The ecological submission is therefore unsatisfactory for the purposes of discharging the condition.

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