

Maes y Ffynnon,
Penrhosgarnedd,
Bangor,
Gwynedd,
LL57 2DW

northplanning@cyfoethnaturiolcymru.gov.uk
03000 654099

Wrexham County Borough Council
The Guildhall,
Wrexham
LL11 1AY

11/03/2020

For the attention of Simon Greenland

Dear Simon,

**BWRIAD / PROPOSAL: APPLICATION FOR APPROVAL OF DETAILS
RESERVED BY CONDITIONS IMPOSED UNDER PLANNING
PERMISSION P/2018/0577**

**CONDITION 7 - SUBMISSION OF DETAILED METHODOLOGY, MANAGEMENT
AND MAINTENANCE REGIME FOR HEDGE TRANSLOCATION
WORKS**

**CONDITION 8 - SUBMISSION OF A DETAILED ARBORICULTURAL METHOD
STATEMENT**

**CONDITION 9 - SUBMISSION OF A SCHEME OF GREAT CRESTED NEWT
MITIGATION, COMPENSATORY MEASURES AND MANAGEMENT
REGIME**

**CONDITION 10 - SUBMISSION OF A SCHEME OF REASONABLE AVOIDANCE
MEASURES (RAMS) IN RESPECT OF GREAT CRESTED NEWTS**

**CONDITION 11 - SUBMISSION OF A BIOSECURITY RISK ASSESSMENT TO
INCLUDE MEASURES TO ADDRESS INVASIVE NON-NATIVE
SPECIES**

LLEOLIAD / LOCATION: Cinders Farm, Cinders, Ruabon, Wrexham

Thank you for re-consulting Cyfoeth Naturiol Cymru / Natural Resources Wales
about the above, which we received on 02/03/2020.

We have significant concerns with the application as submitted. We do not recommend your Authority discharges conditions 9 and 10 for the following reasons.

CONDITION 9 - SUBMISSION OF A SCHEME OF GREAT CRESTED NEWT MITIGATION, COMPENSATORY MEASURES AND MANAGEMENT REGIME

We note the Cinders Farm. Report to Inform Discharge of Condition 9 and 10 (BSG Ecology, February 2020). Habitat creation proposals are considered to be satisfactory.

We note the duration of the long-term plan appears to have been amended. However, the long-term site management proposals are not considered to be satisfactory in respect of:

- No detail is provided in respect of the implications of changes in tenure;
- What contingency is in place in the event of ecological contractors not being appointed;
- No detail is provided in respect of conservation licence requirements in respect of habitat management;
- No detail is provided in respect of the identification of individuals/bodies competent to undertake conservation management works under licence;
- The proposed surveillance methodology and timings are not satisfactory. We advise that abundance (not presence/absence) based surveys are carried biennially, or annually in the event of adverse factors such as fish and/or invasive non-native plants are detected;
- Potential colonization by predatory fish and/or invasive non-native species (INNS). Appropriate cross-reference should be made to the information submitted in support of the discharge of Condition 11 (Cinders Farm, Report to Inform Discharge of Condition 11, BSG Ecology, January 2020).

We consider monitoring is material to the appropriate implementation of long-term management. The Current monitoring proposals are not satisfactory. We advise that long term monitoring methodology is based on and reported to the online Wales GCN Monitoring scheme (see <https://www.cofnod.org.uk/LinkInfo?ID=7>). Monitoring should be carried out at least biennially. Frequency to be increased if fish or INNS are detected, with a minimum duration of not less than 21 years. Currently the submission is not satisfactory for the purposes of discharging this condition.

CONDITION 10 - SUBMISSION OF A SCHEME OF REASONABLE AVOIDANCE MEASURES (RAMS) IN RESPECT OF GREAT CRESTED NEWTS

The submitted RAMS Scheme is not considered to be satisfactory. In our view material omissions include:

- We note that the amended proposal now includes fencing. However, we advise that fencing is inspected on a daily as opposed to a weekly basis (unless the development is carried out between 1 December – 28 February). No plans have been provided in respect of the locations of amphibian fencing

- Inadequate detail concerning site induction throughout the construction phase of the scheme;
- Lack of detail concerning the extent of working areas (we advise that a plan is included in any subsequent ecological report);
- Lack of sufficient detail concerning ecological supervision of the scheme during construction.

Currently the submission is not satisfactory for the purposes of discharging this condition

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, including environmental interests of local importance.

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,

Daniel Davies

Daniel Davies

Uwch Cynghorydd, Cynllunio Datblygu / Senior Advisor, Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales