

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

Ein cyf/Our ref: CAS-118028-R2S5

Eich cyf/Your ref: P/2018/1059

Maes Y Ffynnon,
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02/07/2020

Dear Sir/Madam,

BWRIAD / PROPOSAL: ERECTION OF STORAGE UNITS AND BUILDING FOR LIGHT ENGINEERING (BLOCK 2)

LLEOLIAD / LOCATION: PLOT B, SITE 4000, CLYWEDOG ROAD, SOUTH WREXHAM INDUSTRIAL ESTATE, WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales with additional information about the above, which we received on 26/06/2020.

We continue to have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if you attach the following condition to the permission. Otherwise, we would object to this planning application.

Condition: No development shall commence until a Great Crested Newts Conservation Plan has been submitted to and approved in writing by the Local Planning Authority.

Protected Species

Thank you for reconsulting us on the above application. We have reviewed the following additional submitted information:

- Proposed Development, Plot B, Site 4000, Clywedog Road South, Wrexham Industrial Estate, Wrexham – Preliminary Ecological Appraisal. Marches Ecology. Unpublished. Knight, T. (25/06/2020).
- Proposed Development, Plot B, Site 4000, Clywedog Road South, Wrexham Industrial Estate, Wrexham – Ecological Mitigation Method Statement . Marches Ecology. Unpublished. Knight, T. (25/06/2020).

We welcome the additional information in relation to Great Crested Newts and note the conclusions and recommendations. Based on the updated information we recommend you should only grant planning permission if you attach the following condition to the permission:

Condition: No development shall commence until a Great Crested Newts Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan should include but not necessarily be limited to the following:

1. Build upon the concept principles outlined in the ecological reports below.
 - a) Knight, T. (25/06/2020). Proposed Development, Plot B, Site 4000, Clywedog Road South, Wrexham Industrial Estate, Wrexham – Preliminary Ecological Appraisal. Marches Ecology. Unpublished.
 - b) Knight, T. (25/06/2020). Proposed Development, Plot B, Site 4000, Clywedog Road South, Wrexham Industrial Estate, Wrexham – Ecological Mitigation Method Statement . Marches Ecology. Unpublished.
2. Submission of details concerning the compensation area including habitat creation and enhancement proposals, time scales for competing habitat creation and enhancement measures; and proposed long term tenure. Mitigation land to be occupied and managed by a body approved by the LPA (consider the above points);
3. Submission of details concerning the installation and maintenance of an amphibian friendly surface water management system that does not include gully pots;
4. Details of timing, phasing and duration of construction activities and conservation measures;
5. Ecological Compliance Audit, including key performance indicators;
6. Persons responsible for implementing the works;
7. Post construction monitoring and record dissemination for a period of not less than 25 years. All ponds to be monitored in accordance with the methodology of and results reported through the Wales Great Crested Newt Monitoring Scheme. Methodology shall include annual abundance counts and Habitat Suitability Index;
8. (HSI) assessments. Each water body shall be individually numbered on site;
9. Submission of a long term site management plan (for a period of not less than 25 years. Provisions of the plan to include licences requirements for habitat management and contingency measures that will be actioned if adverse factors (eg fish and/or invasive non- native species are identified). The management plan shall also identify competencies and licences required for the purposes of carrying out identified operations);
10. Submission of a biosecurity risk assessment;

NRW advises that an EPS Licence is required and would refer the Local Authority to the Chief Planning Officer's letter dated 01 March 2018. This advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

The Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that an approved Conservation Plan is implemented, which protects species/habitat affected by the development.

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.

Advice for the Developer

Environmental Management:

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works in, near or over watercourses' and 'Working at construction and demolition sites' which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

The activity of importing waste into the site for use as, for example hardcore, must be registered with Natural Resources Wales as an exempt/permittable activity under the Environmental Permitting Regulations 2016. The developer should contact Natural Resources Wales to discuss the necessity for an exemption/permit for any material imported to and exported from the site.

If during construction/excavation works any contaminated material is revealed, then the movement of such material either on or off site should be done in consultation with Natural Resources Wales. Any waste excavation material or building waste generated in the course of the development must be disposed of satisfactorily and in accordance with Section 34 of the Environmental Protection Act 1990. Carriers transporting waste from the site must be registered waste carriers and movement of any Hazardous Waste from the site must be accompanied by Hazardous waste consignment notes.

Waste:

Waste produced during the construction phase of your development must be dealt with appropriately and be in line with all relevant waste legislation including Duty of Care Regulations and Hazardous Waste Regulations. As part of your waste duty of care you must classify the waste produced:

- before it is collected, disposed of or recovered
- to identify the controls that apply to the movement of the waste
- to complete waste documents and records
- to identify suitably authorised waste management options
- to prevent harm to people and the environment.

Any waste removed from site will be subject to waste management controls. The links below provide information on how to classify waste and register as a waste carrier or hazardous waste producer:

<https://naturalresources.wales/permits-and-permissions/waste/?lang=en>

<https://naturalresources.wales/permits-and-permissions/waste/waste-permits/?lang=en>

Further guidance can be found on the GOV website here:

<https://www.gov.uk/managing-your-waste-an-overview/duty-of-care>

If you have any queries on the above, please do not hesitate to contact us.

Yours faithfully,

Joy Evans

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