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Wrexham County Borough Council
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17/01/2020

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 consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 20/12/2019.

We have significant concerns with the application as submitted. We do not recommend your Authority discharges conditions 9, 10, and 11 for the following reasons.

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

Habitat creation proposals are considered to be satisfactory.

However, the long-term site management proposals are not considered to be satisfactory in respect of:

- Duration (we advise a period of not less than 21 years);
- Identification of licensing requirements;
- Identification of individuals/bodies competent to undertake licensed management works;
- Contingency. No consideration has been given to the potential colonization by predatory fish and/or invasive non-native species (INNS);
- Proposed great crested newt monitoring targets are not satisfactory.

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:

- Lack of any fencing to ensure working areas are clear of amphibians;
- Lack of any proposals to monitor and maintain the integrity of amphibian fences;
- Inadequate detail concerning site induction throughout the construction phase of the scheme;
- Lack of detail concerning the extent of working areas; and
- Lack of detail concerning ecological supervision of the scheme during construction.

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

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

No detail has been provided to justify the discharge of this condition.

We have no comment to make in relation to conditions 7 and 8.

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

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