

Wrexham County Borough Council
The Guildhall,
Wrexham
LL11 1AY

07/01/2020

For the attention of Mared Rees-Jones:

Dear Mared,

PROPOSAL: Land Between Walden House And Holt Lodge Cottages, Hugmore Lane, Wrexham.

LOCATION: Construction Of Manege

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 19/12/2019.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirement. Otherwise, we would object to this planning application.

Requirement 1: Protected Species: Further information is submitted to satisfactorily demonstrates that the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of the local population of GCN at this locality.

Protected Species

An ecological report has been submitted to inform the planning decision making process (Ecological Impact Assessment at Hugmore Lane, Llan y Pwll, Wrexham, Susan Worsfold, 10/12/2019).

In our view, the overall proposal has the potential to cause disturbance to great crested newts (GCN) and/or loss or damage to their resting places. We consider that it is possible that the species utilizes the site for foraging, dispersal or sheltering purposes. We hold records of the species within 150m of the proposals.

We advise that the current ecological report is unsatisfactory. Material issues include:

- Absence of background searches on extant ecological information;
- Fails to include details or approaches to amphibian avoidance e.g. newt fencing /mitigation;
- Fails to provide any mitigation/compensatory proposals;
- Fails to consider biosecurity issues.

In conclusion, we do not consider the ecological report satisfactorily demonstrates that the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of the local population of GCN at this locality. Further information is required to assess the extent of adverse effects on GCN and any avoidance or mitigation measures required.

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.

Advice to Developer

Pollution Prevention

All works at the site must be carried out in accordance with PPG6: '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/>

Waste produced during construction

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>

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales