

Mr Emlyn Jones
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Planning and Public Protection Services
Development Management
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15 Aug 2022

Dear Sir,

Application No. 01/2022/0523

Proposal: Consolidating application for the extension of winning and working limestone, importation of inert waste and restoration to amenity land

Location: Graig Quarry, Graig Road, Denbigh

Please accept my apologies for the delay in submitting this letter. I hope it can still be taken into consideration.

The North Wales Wildlife Trust (NWWT) wishes to object to this planning application as it currently stands.

It is acknowledged that with good planning, mitigation and restoration in place, developments such as this can result net biodiversity benefit in the long-term and in our experience Breedon operates to high environmental standards. However, due to issues outlined below we have no option but to object to this development as it currently stands.

We are concerned that impacts upon wildlife may not have been adequately assessed at this present time and this could affect the success of mitigation measures. We are also unclear about the exact timings of some of the works proposed and this raises questions regarding impacts upon wildlife, some of which could be long-term.

We are concerned that the majority of the wildlife surveys that have been undertaken are now out-of-date. The Chartered Institute of Ecology and Environmental Management (CIEEM) recommends that ecological reports older than three years are unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated. It is acknowledged that a Preliminary Environmental Appraisal (PEA) has been undertaken, however, the latest appraisal was undertaken in June 2021 (report produced in September 2021) so this information is now itself over one year old. Whilst



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we consider the PEA adequate to assess whether significant habitat change has occurred or not, we do not consider the PEA to be an adequate replacement for up-to-date species surveys:

- **Bat Activity Surveys**

Three Bat Activity Surveys were undertaken in 2019, two of which are now over three years old and one of which is highly likely to be over three years old before any works commence. We are not convinced that the PEA adequately replaces the need for updated surveys.

- **Bat Roost Surveys**

All but the very last bat roost survey is now over three years old, and the latest one, undertaken in Nov 2019, would most likely be out-of-date by the time any work commences. It is acknowledged that the PEA did repeat surveys of potential bat roosts in 2021, but it also recommended that nocturnal bat roost surveys were undertaken (with regard to tree T2) and to our knowledge these surveys did not occur. We are also unclear about whether bat roost surveys were undertaken within the portion of regenerating woodland present to the SW of the development site, which would, according to the plans submitted, be lost as a result of the development.

- **Breeding Bird Survey**

The last Breeding Bird Survey was undertaken in 2019. This survey recorded Peregrine falcon being present. The species was twice spotted in the same location as well as twice being heard nearby and the report presumed it was a permanent territory due to its territorial behaviour and call. The exact nesting location was not identified and even if it had been, its location might have changed since and now could be directly affected by the proposed works. The nest location needs to be identified before impacts can be determined and adequate avoidance/ mitigation measures implemented. As the Breeding Bird Surveys are out-of-date there may now be other bird species adversely affected by the proposals, despite the cursory update work undertaken as part of the PEA.

- **Hazel Dormouse**

The ecological reports state that habitat suitable for Hazel dormouse is present within the site and that records of the species exist that are within 1.6km to the south of the site. The previous detailed survey was undertaken in 2019 and it is not inconceivable that dormouse might have spread to the area in that time. A repeat of the surveys would seem to be appropriate.

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As well as the above, we have some concerns regarding the proposed mitigation work. Firstly, we're not at this stage convinced that the replacement planting of woodland along the South, South West and West of the site would adequately mitigate for the loss of regenerating woodland habitat occurring as a result of the development. Secondly, it is not currently clear to us whether hedgerow, scrub and woodland due to be planted to function as bat replacement bat commuting routes will have grown sufficiently to be effective before the existing bat commuting routes are lost to the development.

If you require further information or clarification, please do not hesitate to contact me.

Yours faithfully,

Adrian Lloyd Jones
Living Landscape Manager

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