BURO HAPPOLD

STŌK CAE RAS STADIUM KOP Stand Redevelopment

Ecological Appraisal

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Revision P02

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Glossary

Term	Definition
CIEEM	Chartered Institute of Ecology and Environmental Management
COFNOD	North Wales Environmental Information Service
EcIA	Ecological Impact Assessment
EPS	European Protected Species
LNR	Local Nature Reserve
LWS	Local Wildlife Site
MAGIC	The Multi-Agency Geographical Information for the Countryside
NBB	Net Benefit for Biodiversity
NERC Act	Natural Environment and Rural Communities Act 2006
PEA	Preliminary Ecological Appraisal
PPW	Planning Policy Wales
PRA	Preliminary Roost Assessment
SINC	Site of Importance for Nature Conservation
SLINC	Site of Local Importance for Nature Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TN	Target note
UKHab	UK Habitat Classification System
WCA	Wildlife and Countryside Act 1981 (as amended)
Zol	Zone of influence

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1 Executive summary

1.1 Understanding the project

Buro Happold has been commissioned by Wrexham Association Football Club to undertake an Ecological Appraisal to support a Section 73 planning application for the development of the 'Kop' stand at Mold Road, Wrexham. This report is an update to the previous Preliminary Ecological Appraisal (PEA) conducted by Ramboll UK Limited in 2022 for the original planning application (P/2022/0725). Since the last survey, the old 'Kop' stand and priority habitats, including broadleaved woodland and open mosaic habitat, have been removed as part of site clearance works.

1.2 Key report findings and recommendations

- Following the demolition of the old stand and site clearance, the site now has low ecological value. The UK Habitat survey identified that the site currently comprises hardstanding, a temporary stand, a fan zone with small storage units, artificial unvegetated surfaces, and small patches of sparsely vegetated urban land with short ephemeral and perennial vegetation, stones, and rubble.
- The Preliminary Roost Assessment (PRA) found no bat roosts or evidence of roosting bats. The temporary structures on-site (including the stand and small buildings) lack features suitable for roosting bats and are considered to have negligible potential for supporting them. Therefore, no further bat surveys were required.
- No evidence of other protected or priority species was found during the survey, and the site provides limited habitat to support them. Consequently, no further species surveys were required.
- Recommendations include mitigation measures and enhancements such as landscaping that incorporates wildflower and pollinator-friendly planting, integration of sustainable drainage systems, green walls and gardens where feasible, as well as the provision of habitat features such as bat and bird boxes and features supporting invertebrates. All of these will contribute to delivering a Net Benefit for Biodiversity.

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2 Introduction

Buro Happold has been commissioned by Wrexham Association Football Club to undertake an Ecological Appraisal to support a Section 73 planning application related to the development of the 'Kop' stand. Ramboll UK Limited ('Ramboll') produced a Preliminary Ecological Appraisal report (Ramboll, 2022) for the previous planning application (P/2022/0725). This report serves as an updated version to support the Section 73 application associated with the original application (P/2022/0725).

The ecological appraisal covers the proposed development site located at Mold Road, Wrexham, LL11 2AH (central grid reference: SJ 32879 50949), hereafter referred to as the 'site'. The site currently includes a temporary stand and the adjacent land to the east, which features a temporary fan zone area. The site plan can be found in Figure 2—1.

Previously, the site included a disused 'Kop' stand and two priority habitats: broadleaved woodland and open mosaic habitat on previously developed land. Since the last ecological survey conducted by Ramboll in 2022, the old stand has been demolished and the site has been cleared, resulting in the removal of these habitats.

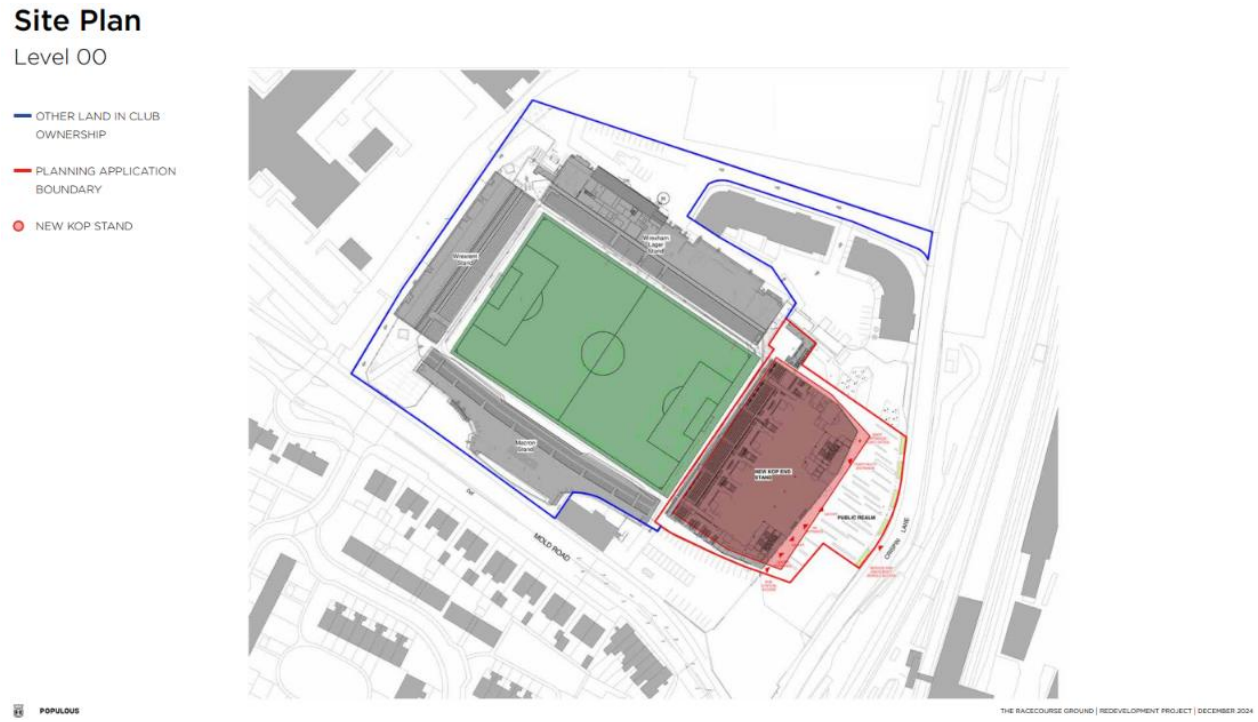


Figure 2—1 Site plan: Planning application boundary (red) and ownership boundary (blue)

The current proposals are as follows:

'The existing planning permission is being amended through a revised set of drawings showing updated floorplans, elevations, and different materials. The land use and application boundary are unchanged, and the bulk and massing are very similar.'

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2.1 Site context

The site is situated in an urban area in the northwest part of the City of Wrexham. It is bordered to the south by Mold Road, to the east by Crispin Lane, and to the west and north by Wrexham Glyndwr University and its associated grounds.

The wider landscape around the stadium includes a mix of urban and green spaces. A railway with an adjacent strip of woodland runs to the east of the site, just beyond Crispin Lane (Figure 2—2).

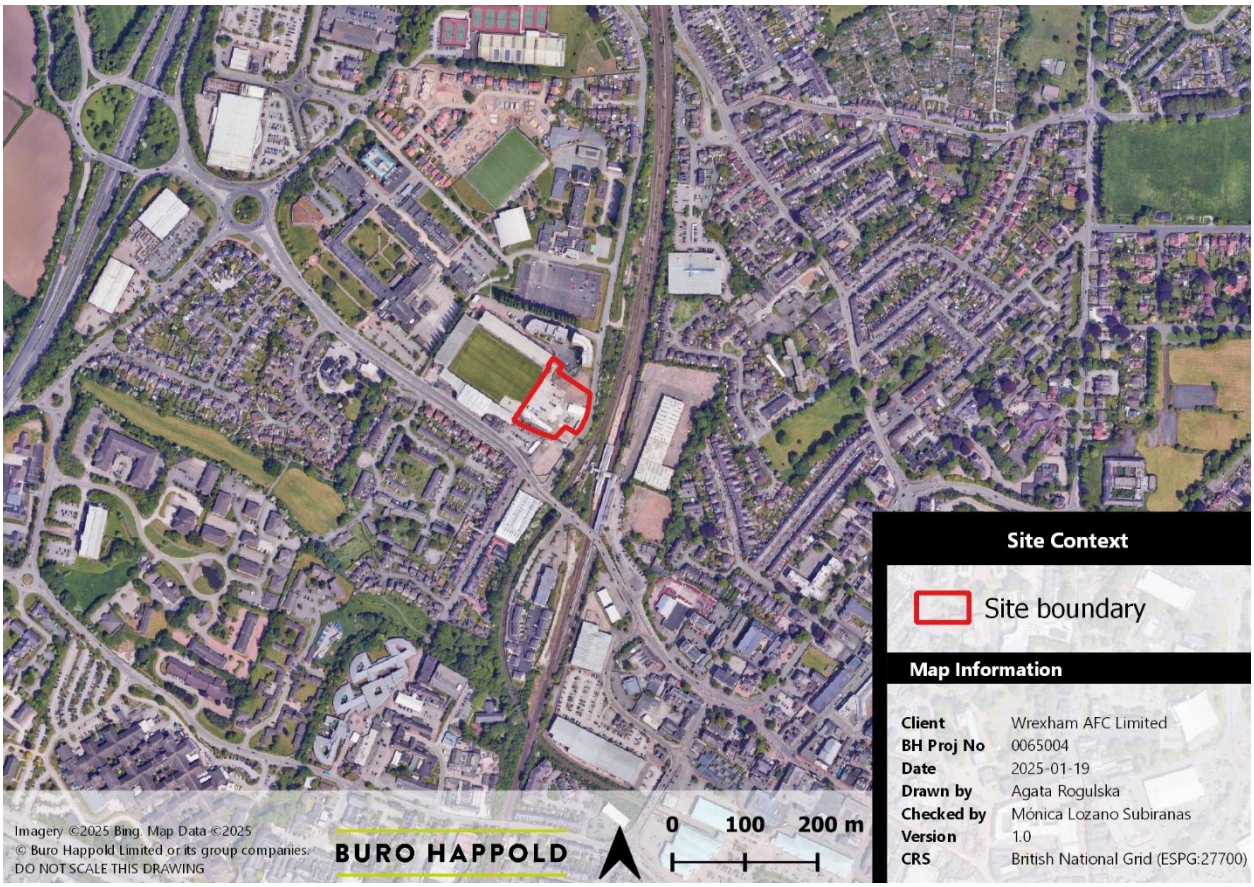


Figure 2—2 Site location in the wider context

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3 Methodology

In accordance with best practice guidance for undertaking ecological appraisals of sites for development (CIEEM, 2017), baseline information regarding the ecology of the site, and its likely zone of influence (ZoI), was gathered through desk study research of existing records on or within a defined buffer of the site, as well as a habitat survey using an established habitat classification and mapping methodology.

3.1 Desk study

The desk study was conducted by Ramboll as part of PEA in June 2022. Following guidance from CIEEM's 'Guidelines for Preliminary Ecological Appraisal' (CIEEM, 2017), it was concluded that repeating the desk study for the updated Ecological Appraisal was not necessary. The existing desk study data remains valid and relevant, due to the site being located in a highly urbanised area with low-value habitats. Only the habitat survey required updating for the revised Ecological Appraisal. The desk study included an ecological data search from the North Wales Environmental Information Service (COFNOD) and the Multi-Agency Geographic Information for the Countryside (MAGIC). Its purpose was to gather existing baseline data about the site and the Zone of Influence (ZoI), such as the location of designated sites or other natural features of potential ecological value. The following ZoI was considered:

- Non-statutory designated sites, such as Local Wildlife Sites (LWS), Sites of Importance for Nature Conservation (SINC), and Sites of Local Importance for Nature Conservation (SLINC), up to 1 km from the site.
- National statutory designated sites, including National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI), and Local Nature Reserves (LNR), up to 2 km from the site.
- International statutory designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), and Ramsar sites, up to 10 km from the site.

3.2 UK Habitat survey

In accordance with CIEEM's 'Advice Note on the Lifespan of Ecological Reports and Surveys' (CIEEM, 2019), it was necessary to repeat the survey for the updated Ecological Appraisal due to significant changes in the habitats on-site, as the site has been cleared since the last survey conducted by Ramboll (Ramboll, 2022).

A UK Habitat Classification Survey (UKHab) of the site was undertaken on the 15th of January 2025, in accordance with the UK Habitat Classification System (UKHab Ltd, 2023). As part of the survey, all accessible external areas of the site were walked with habitat types and features present recorded. The survey was extended to include the search for the presence, or potential for presence, of protected and notable species on or near the site. Target notes (TN) were used to record any habitats or features of particular interest and any sightings, signs, or evidence of protected or notable fauna, as well as any potential habitats or features suitable to support these species.

3.3 Preliminary Roost Assessment (PRA)

A Preliminary Roost Assessment (PRA) was previously undertaken by Ramboll (Ramboll, 2022). However, due to the site clearance and demolition of the old stand, it was necessary to conduct an assessment of the temporary stand and temporary buildings currently on site.

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A PRA of the structures on the site was made for their potential to support roosting bats in accordance with best practice (Collins, 2023), as part of the UK Habitat survey. Each structure has been classified into a category dependent on the presence of features suitable to support bat roosts. Table 3—1 provides criteria for each of these categories.

Table 3—1 Guidelines for assessing the potential suitability of structures to support bat roosts.

Potential suitability	Roosting habitat in structures
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by large numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

3.4 Assessment of Importance of Ecological Features

On-site ecological features have been considered for their level of importance within a defined geographical context in accordance with CIEEM guidelines (CIEEM, 2019).

The following geographic frame of reference has been used for the assessment:

- International Importance;
- National Importance (Wales);
- Regional Importance (North Wales);
- County/ Borough Importance (Wrexham County Borough);
- Local Importance (Wrexham town);
- Negligible Importance.

A wide range of sources can be used to assign importance to ecological features, including legislation and policy. Ecological features not included in legislation and policy may also be assigned importance due to, for example, local rarity or decline or provision of a functional role for other ecological features. Professional judgement is used to assign such importance.

3.5 Limitations/ constraints to surveys

The UKHab survey was conducted in January, which is outside the optimal survey period (April to September) when plants are generally visible. However, this was not considered a limitation as the site is dominated by hardstanding and

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low-value habitats (artificial unvegetated – unsealed surface, sparsely vegetated urban land). As such, it is considered that the habitats present on-site have been categorised accurately.

The only desk study information available was from Ramboll's report (Ramboll, 2022), and no additional information could be provided. Given the habitats present on-site, this is not considered to be a limitation to the assessment presented in this report.

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4 Results

4.1 Designated sites

Statutory Sites

The Gatewen Marsh SSSI is located about 1 km northwest of the site. This site is designated for its diverse range of plant species, including greater reedmace (*Typha latifolia*) and brooklime *(Veronica beccabunga*) and primarily consists of wetland and marsh habitats. It is separated from the proposed development by urban areas and a major highway (A483), with no hydrological pathways (such as watercourses or culverted watercourses) connecting the development to the site.

There are no other statutory designated sites within 2 km of the proposed development. The River Dee SSSI is approximately 10 km east via the nearest hydrological pathway, the River Gwenfro, which is about 900 m from the proposed development. Therefore, no impact pathway is identified. There are no other designated sites within 10 km of the site.

Due to the nature of the works and lack of tangible impact pathways, it is considered unlikely that these statutory sites will be impacted by the proposals. Therefore, statutory designated sites are not considered further in this assessment.

Non-Statutory Sites

There are no non-statutory designated nature conservation sites within 1 km of the site. Given the nature of the works, no impacts are predicted beyond 1 km. Therefore, non-statutory designated sites are not considered further in this assessment.

4.2 Habitats

The search on the MAGIC website did not identify any priority habitats within 2 km of the site.

The site previously included two priority habitats: broadleaved woodland and open mosaic habitat on previously developed land. Additionally, it featured scattered scrub, semi-improved neutral grassland, and areas of ephemeral, short perennial vegetation and bare ground. Since the last ecological survey conducted by Ramboll in 2022, the site has been cleared, resulting in the removal of these priority habitats. Consequently, no priority habitats are currently present on the site.

The site currently comprises hardstanding, a temporary stand, a fan zone with small storage units, artificial unvegetated, unsealed surface, and small areas of sparsely vegetated urban land with short ephemeral and perennial vegetation, stones, and rubble. A butterfly bush (*buddleja davidii*) stand was also recorded near the site boundary (TN 1 in Figure 4—1).

All habitats recorded on site during the UK Habitat Classification survey are illustrated in Figure 4-1 and described in Table 4-1.

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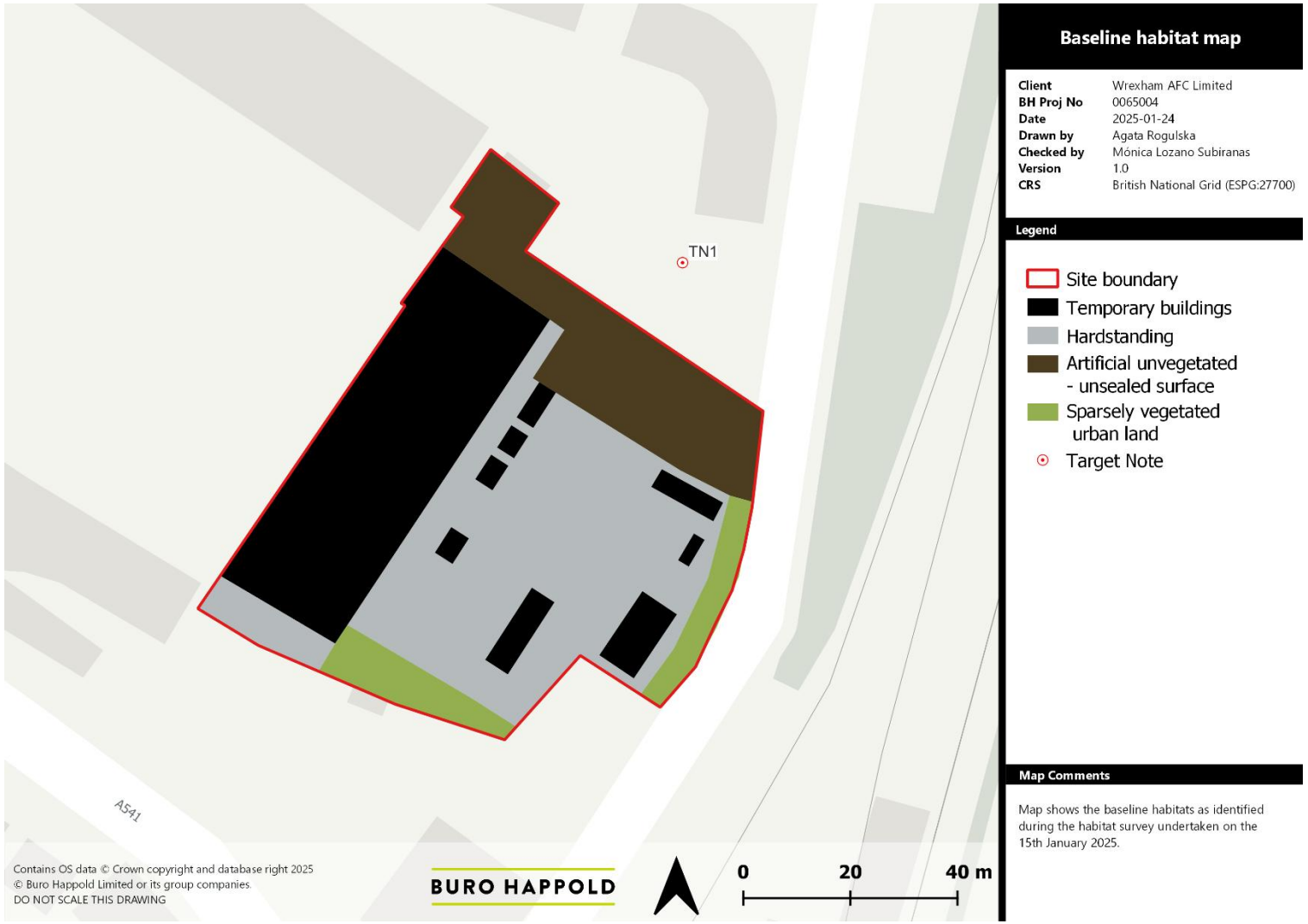


Figure 4—1 Baseline habitat map

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Table 4—1 Habitats identified on site and their description

Habitat	Description/notes	Geographic level of importance	UK Hab Primary Code	UK Hab Secondary Code
Buildings	Buildings include the temporary stand and temporary bar area, storage units, restrooms and a marquee. The temporary stand is made from modular metal components and was installed to address the stadium's limited capacity issues before the construction of a new permanent 'Kop' Stand.	Negligible	u1b5	815 (commercial), 822 (recreation ground)
Hardstanding	The hardstanding area stretches eastward from the temporary stand to the road. This section includes the temporary fan zone, which features food stands, a bar area, a marquee, storage units and restrooms.	Negligible	u1b	822 (recreation ground)
Artificial unvegetated - unsealed surface	An area of bare ground is located in the northeast of the site. It has a vegetation cover of up to 10% and has not been sealed with impervious material. Before the site clearance, this area consisted of woodland, grassland, and ephemeral/perennial vegetation.	Negligible	u1c	510 (bare ground)
Sparsely vegetated urban land	Two small areas of sparsely vegetated urban land characterized by short ephemeral and perennial vegetation, bare ground, stones, and rubble. Vegetation cover in these areas ranges from 10% to 50%. These unmanaged sections are fenced off from the temporary fan zone.	Negligible	u1f	510 (bare ground) 81 (ruderal or ephemeral) 518 (neglected)

4.3 Species

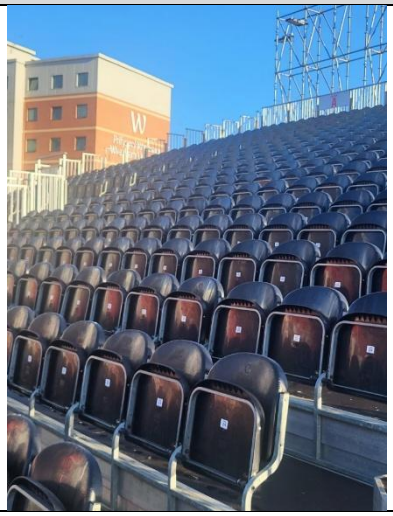
Bats

According to MAGIC, no European Protected Species (EPS) licences have been obtained for bats within 2 km of the site. An ecological data search provided by COFNOD (Ramboll, 2022 – Appendix B) shows that two species of bats have been recorded in the past 10 years: the common pipistrelle (*Pipistrellus pipistrellus*) and the noctule (*Nyctalus noctule*). The nearest record is for the common pipistrelle, located approximately 667 metres to the northwest of the site.

No bat roosts or evidence of roosting bats were identified during the PRA of the site. The temporary stand and small temporary buildings associated with the temporary fan zone were deemed to lack features suitable for roosting bats. Therefore, all structures on site have been considered to have a 'negligible' potential to support roosting bats. Details are provided in Table 4—2.

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Table 4—2 Bat roost potential in structures present on site.

Structure	Feature description	Image	Bat roost potential
Temporary stand	No features present in this structure to support roosting bats		Negligible
Temporary restrooms	No features present in this structure to support roosting bats		Negligible
Temporary storage and bars	No features present in this structure to support roosting bats		Negligible

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Marquee	No features present in this structure to support roosting bats		Negligible

The habitats present on site have very limited potential to support foraging and commuting bats. Connectivity to suitable bat habitats in the wider landscape is poor given the highly urban nature of the site, with the exception of the nearby railway embarkment, which can provide potential commuting features.

Birds

The data search provided by CODFNOD (Ramboll – Appendix B) returned records of bird species typical of urban environments within 1 km of the site, including but not limited to: house sparrow (*Passer domesticus*), herring gull (*Larus argentatus*), starling (*Sturnus vulgaris*), house martin (*Delichon urbicum*), pied flycatcher (*Ficedula hypoleuca*), and herring gull (*Larus argentatus*). Additionally, the black redstart (*Phoenicurus ochruros*) has been recorded locally. It is possible that this species could use the area of bare ground and sparsely vegetated urban land during the breeding season (March-August, inclusive), but no suitable nesting habitat is present.

However, the on-site habitats have very limited potential to support nesting birds and no evidence of nesting birds, such as old nests or typical nesting activity, was recorded during the survey.

Other species

From the ecological data search obtained via COFNOD (Ramboll, 2022 – Appendix B), three species of invertebrates were recorded within 1 km of the site in the last 10 years: the non-native harlequin ladybird *(Harmonia axyridis*), the large yellow-faced bee *(Hylaeus Prosopis signatus*), and the white-letter hairstreak *(Satyrium w-album*). Of these, the white-letter hairstreak is listed on the UK BAP and has additional protection as priority species. This species was recorded approximately 578 m northwest of the site. However, due to the absence of suitable habitat on-site, it is not expected to utilise the site for any of its life stages.

The ecological data search also included one record of reptiles in the past 10 years, a common lizard *(Zootoca vivipara*), recorded approximately 300 m south of the site near the railway line adjacent to the Premier Inn.

The areas of sparsely vegetated urban land on-site with scattered rubble and debris could be used by invertebrates and may provide suitable habitat for reptiles. However, poor connectivity with other suitable habitats in the wider landscape due to physical barriers such as roads, makes the presence of reptiles on-site unlikely.

No evidence of other protected or priority species was found during the survey.

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5 Impacts, mitigation and enhancement

5.1 Impacts and mitigation

5.1.1 Habitats

To facilitate development, the area of sparsely vegetated urban land will be cleared. Since the on-site habitats that will be lost due to development are of low ecological value and have limited potential to support protected, priority, or notable species, no mitigation is required.

5.1.2 Species

Bats

In the UK, all bat species and their roosts are legally protected under both domestic and international legislation. This includes the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. It is illegal to deliberately capture, injure, or kill a bat as well as to disturb them or damage their breeding or resting sites. Activities that could result in harm to bats or their habitat will require a licence. This comprehensive legal framework aims to ensure the conservation of bat populations across the UK.

Due to the lack of features suitable for roosting bats and the urban nature of the site, the temporary stand and other temporary structures present on site have been identified as having 'negligible potential' to support roosting bats. Therefore, in accordance with the most recent best practice guidance, further surveys are not required.

As the proposed scheme will not impact any potential roosting features (PRFs) or habitats that could support bats, no mitigation measures are required.

Breeding birds

In the UK, all wild birds, their nests, and eggs are protected under the Wildlife and Countryside Act 1981. This legislation makes it illegal to intentionally kill, injure, or take any wild bird, as well as damage or destroy their nests while they are in use or being built. Additionally, certain species, known as Schedule 1 birds, receive extra protection, making it an offence to disturb them while they are nesting.

If any vegetation clearance is required during the removal of the temporary stand and to facilitate the development, it should be undertaken outside the bird nesting season (March-August inclusive). Where avoidance of the bird nesting season not feasible, a suitably experienced ecologist should carry out a nesting bird check no more than 48 hours before vegetation removal. If an active nest is found, this would need to be protected throughout the works with a suitable buffer area as defined by the ecologist, until the chicks have fledged, and the nest is no longer in use.

Other species

Reptiles are protected under the Wildlife and Countryside Act 1981, which makes it illegal to intentionally kill or injure them.

It is unlikely that common reptile species are present on-site, and therefore, no mitigation measures are required.

5.2 Ecological Enhancement

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In Wales, a Net Benefit for Biodiversity (NBB), last updated in March 2023, embedded within the Environment (Wales) Act 2016 and Planning Policy Wales (PPW), mandates that any new development must not only avoid significant loss of habitats and species but also actively enhance biodiversity and ecosystem resilience. This approach goes beyond mere mitigation, requiring developers to improve and create habitats, ensuring that ecosystems are left in a better state than before.

Additional biodiversity enhancement measures that will contribute to delivering NBB are detailed in below sections.

5.2.1 Habitats

Habitat areas are being proposed along the eastern site boundary. Native tree and shrub planting in these areas would strengthen the existing woodland corridor along Crispin Lane. This aligns with Wrexham Local Development Plan Policy SP19: Green Infrastructure, which requires that development should, where appropriate, create new interconnected areas of green infrastructure between the proposed site and the existing network.

The proposed landscaping within the public realm, for example, along pathways and parking areas, should aim to incorporate wildflower and pollinator-friendly shrub areas to provide floristic diversity and interest for native pollinator species. When non-native planting is proposed, it is recommended to select species that benefit pollinators. For instance, if ornamental non-native species are preferred in the landscaping design, those listed on the Royal Horticultural Society's 'Plants for Pollinators' list, or otherwise recognized for their benefits to UK pollinator species such as bees and butterflies, should be used to enhance the development design with beneficial planting for native species.

The landscaping should also include the integration of Sustainable Drainage Systems (SuDS), such as rain gardens, and green walls, where feasible. SuDS help manage surface water runoff, reduce flood risk and create habitat for wildlife. Green walls provide a range of benefits and can reduce urban heat island effect, protect building façades, improve air quality, reduce noise and contribute to biodiversity. Green walls climbing plans could be incorporated on one or more elevations of the new stand. SuDS and green walls can also be used to support the increase of green infrastructure within the local area of the development.

5.2.2 Bats

Enhancements for bats could be provided through the installation of bat boxes on suitable planted trees or integrated into the new building on the site. Details of these are provided in Table 5—1.

Table 5—1 Examples of bat boxes

Box type	Description	Specification
Miramare Bat Box 	The bat box has four internal compartments and is made from FSC certified WoodStone. It can be mounted using brackets and has two additional fixing eyes that allow a rope or wire to be passed around a tree trunk. Bat boxes should be mounted on suitable trees 3–5 metres high.	Diameter: 25cm Height: 85cm Weight: 22.2kg Materials: FSC certified WoodStone and exterior grade plywood
1FF Schwegler Bat Box with Built-in Wooden Rear Panel	This bat box has an opening at the bottom, allowing droppings to fall out, so it does not need cleaning, making it suitable for hanging in inaccessible places such as high in trees. The box is	Dimensions: Height: 43cm

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Box type	Description	Specification
	made from long-lasting Woodcrete, concrete, and clay. It can be sited in trees or on buildings and is best positioned at a height of between 4 to 6 metres.	Width: 27cm Length: 14cm Entrance hole: 12cm x 24cm Weight: 9.5kg Material: Schwegler Woodcrete Colour: Black with stable hard-wearing wooden insert Supplied with: Galvanised steel hanger and aluminium tree-friendly nail
2FN Schwegler Bat Box 	The bat box has two entrances, one at the front and one at the rear against the tree, and it has a domed roof to allow the bats to form roosting clusters for warmth. This bat box is also designed to be effective against small predators and excludes draughts and light. The bat box also has an opening at the bottom, therefore does not require cleaning. It is constructed with Woodcrete, concrete, and clay. Bat boxes should be mounted 3–5 metres high on trees at varying heights and different orientations between east, south, or west facing to provide a variety of conditions	Dimensions: Height: 36cm, Diameter: 16cm Weight: 4.3kg Material: Schwegler Woodcrete Colour: Black with grey front panel Supplied with: Galvanised steel hanger and aluminium tree-friendly nail
1FD Schwegler Bat Box 	This bat box has been developed specifically for smaller bats, as both the interior and the type and size of the entrance hole match the requirements of smaller species. It features a special layout inside the domed roof, an increased interior height, and two grooved internal wooden front panels with precise spacing between them. This model has proved highly effective as a nursing area. The front panel can be removed for cleaning and inspection. This box is designed to be sited on trees using the galvanised steel hanger and aluminium nail provided. Bat boxes should be mounted 3–5 metres high on trees at varying heights and different orientations between east, south, or west facing to provide a variety of conditions.	Colour: Black, grey front panel Material: Schwegler wood-concrete, galvanised steel hanger Diameter: 16cm Height: 36cm Weight: 4.8kg

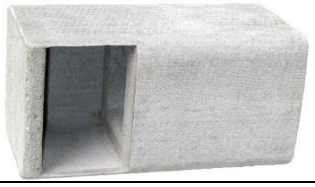
5.2.3 Breeding birds

Where appropriate, bird nesting features can be created on-site to provide new nesting and foraging habitats for birds. In, particular, urban tree and hedgerow/ scrub planting can provide both foraging and nesting opportunities for birds. In addition, (depending on the targeted species) affixing nesting boxes to the side of buildings can provide additional bird nesting opportunities. Details of these are provided in Table 5—2.

Table 5—2 Examples of bird boxes

Box type	Description	Specification
Swift Box No 17A Triple Cavity	This swift box is made from a special mixture of compressed plant fibres and concrete which enables it to provide good insulation and an extremely long life. It can accommodate three pairs of swifts in parallel, enabling the rapid formation of swift colonies. These boxes should be installed at the roof level, where there is unobstructed access for swifts entering and leaving.	Dimensions: Height: 15cm Width: 98cm Length: 15cm Weight: 7.1kg

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Box type	Description	Specification
	Where possible, boxes should be sited under the shelter of eaves or overhanging roofs.	Supplied with two L-shaped fixing brackets and screws.
Black redstart -1HE Schwegler Brick box 	The brick box is a lightweight nesting box made of plant fibre and is intended for installation in or on external walls of buildings of all kinds. Because of its special narrowing entrance, it is safe against magpies, jays, cats and martens. .	Length 28cm Height 15cm Depth 15cm
1N Schwegler Deep Nest Box 	The 1N Schwegler Deep Nest Box is suitable to support a range of bird species including black redstart, spotted flycatcher and pied wagtail, as well as more generalist birds such as robins and wrens.	External dimensions: 20 x 20 x 30cm Nesting chamber: 15 x 21cm Entrance hole (twin): 30 x 50mm Weight: 5.6kg Material: Woodcrete
Vivara pro Woodstone Kingfisher Tunnel 	The tunnels are made from WoodStone, a mix of cement and FSC wood fibres making them resistant to rot. The tunnels provide a thermally stable internal environment and increased protection from predators. These boxes should be positioned at least 1m above the ground.	Tunnel dimensions: Height: 150mm Width: 150mm Length: 550mm Weight: 5.5kg Nesting chamber dimensions: Height: 165mm Width: 275mm Depth: 275mm Weight: 6.3kg
Vivara Pro Woodstone 32mm Nest Boxes 	This type of smaller entrance hole nest boxes are suitable for a number of general birds which are well adapted to urban environments and would be expected to be seen within urban landscaping such as blue tits, coal tits and house sparrows. The boxes will be placed on 'large' planted trees with trunks large enough to support a box at a preferred height at between 1.5-3m. They should be sited in proximity to other vegetation, such as trees and shrubs to provide cover as well as native grassland which will provide foraging opportunities.	Entrance hole diameter: 32mm Width: 20cm Height: 31cm Length: 20cm Weight: 6.9kg

5.2.4 Other enhancements

In conjunction with the incorporation of pollinator planting, the installation of habitat features specifically to benefit invertebrates near pollinator planting can provide additional cover, food and nesting/resting habitat for invertebrates. Further details are provided in Table 5—3.

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Table 5—3 Examples of habitat features

Box type	Description	Specification
Insect Tower 	This type of box provides habitat for solitary bees and other insects. The design of the tower provides a range of different habitats to support a variety of insect species. The nesting tubes are suitable for solitary bees to build their nests in, the vertical slots are designed to encourage butterflies, the other refuge holes are suitable for ladybirds and lacewings and the pinecones offer a habitat for a range of other species.	Width: 21cm Height: 65cm Depth: 12.5cm Weight: 3kg
BeePost 	Freestanding bee towers designed for solitary bees. The posts should be positioned in a warm sunny spot, south facing, with no vegetation in front of the holes. They are designed to be set into a concrete base approximately 30mm into the ground.	Material: Concrete Origin: Cornwall, UK Colour: White Dimensions: Width: 12cm Height: 230mm Depth: 12mm Weight: 75kg

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6 Conclusion

The UK habitat survey has identified that, following the demolition of the old stand and site clearance, the site now offers low ecological value. The site predominantly consists of hardstanding, a temporary stand, a fan zone with small storage units, artificial unvegetated surfaces, and small patches of sparsely vegetated urban land with short ephemeral and perennial vegetation, stones, and rubble. Given the nature of the proposed works, it is unlikely that any statutory or non-statutory sites will be impacted.

The proposed scheme will impact only habitats of low ecological value, including an area of sparsely vegetated urban land and bare ground.

The Preliminary Roost Assessment (PRA) found no bat roosts or evidence of roosting bats. The temporary structures on-site, including the stand and small buildings, lack features suitable for roosting bats and thus are considered to have negligible potential for supporting them. Consequently, no further bat surveys are required.

No evidence of other protected or priority species was found during the survey. However, the site offers some potential habitat for nesting birds typical of urban environments. Measures to protect nesting birds during clearance and construction activities are recommended.

The site is unlikely to support other protected or priority species. Therefore, no further species surveys or mitigation measures are required.

Proposed mitigation and enhancements across the site can contribute to delivering a Net Benefit for Biodiversity.

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8 List of Appendices

Reference	Title
Appendix A	Legislation and policy considerations
Appendix B	Preliminary Ecological Appraisal report (Ramboll 2022)

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Appendix A Legislation and Policy Considerations

A.1 Legislation

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 ensure that the UK's legal framework for protecting habitats and species remains robust post-Brexit. This legislation maintains the protection of species and habitats previously covered under EU law by establishing a national site network, replacing the Natura 2000 network. For those animal species listed on Schedule 2, it is an offence to deliberately capture, kill, disturb, or take, or destroy the eggs of a European Protected Species (EPS), or to damage or destroy a breeding site or resting place of an EPS. Additionally, under the Habitat Regulations, it is an offence to deliberately pick, collect, cut, uproot, or destroy a wild plant listed in Schedule 5. However, these actions can be made lawful through the granting of licences by the appropriate authorities.

The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the primary piece of legislation in England and Wales for protecting wildlife in England and Wales. This legislation makes it illegal to deliberately take, kill or injure a protected wild animal, or to intentionally, or recklessly, disturb such an animal in its place of shelter, or to damage, destroy or obstruct access to laces of shelter.

Environment (Wales) Act 2016

The Environment (Wales) Act 2016 was introduced to establish the necessary legislation for planning and managing Wales' natural resources in a sustainable and integrated manner.

The Environment Act introduced a new duty to replace the existing biodiversity duty outlined in the Natural Environment and Rural Communities Act 2006. Previously, public authorities were required to have regard to conserving biodiversity. The new Section 6 duty goes further, requiring all public authorities, when carrying out their functions in Wales, to seek to “maintain and enhance biodiversity” where it is within the proper exercise of their functions. Additionally, public authorities must also seek to “promote the resilience of ecosystems”.

Wild Mammals Protection Act 1996

The Wild Mammals (Protection) Act 1996 is a crucial piece of legislation in the UK that safeguards wild mammals from acts of cruelty. This cat makes it an offense to intentionally cause unnecessary suffering to any wild mammal through actions such as mutilating, kicking, beating, crushing, drowning or asphyxiating. Violations of this act can result in significant penalties, including fines and imprisonment.

Protection of Badgers Act 1992

The Protection of Badgers Act 1992 is a key piece of legislation in the UK that provides comprehensive protection for badgers and their setts. It is illegal to kill, injure, or take a badger, and to interfere with their setts, which includes damaging, destroying, or obstructing access to them. The act was introduced in response to the high levels of persecution badgers faced, aiming to safeguard these animals from harm. Licences can be issued for certain activities, such as scientific research or necessary development work, but these are strictly regulated. Violations of the act can result in significant penalties, including fines and imprisonment.

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A.2 National policy

Planning Policy Wales (PPW, 2021)

This policy framework sets out the Welsh Government's land use planning policies, emphasizing the importance of biodiversity and ecosystem resilience. Recent updates focus on achieving net benefits for biodiversity and strengthening policies on Sites of Special Scientific Interest (SSSIs), trees, woodlands, and green infrastructure.

It states: "*Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity. In doing so planning authorities must also take account of and promote the resilience of ecosystems.*"

The Net Benefit for Biodiversity (NBB) mandates that any new development must not only avoid significant loss of habitats and species but also actively enhance biodiversity and ecosystem resilience. This approach goes beyond mere mitigation, requiring developers to improve and create habitats, ensuring that ecosystems are left in a better state than before. NBB encourages developers to consider biodiversity and ecosystem benefits early in the design process.

Future Wales: The National Plan 2040

Future Wales includes Policy 9 – Resilient Ecological Networks and Green Infrastructure, a high-level strategic policy aimed at advancing and integrating biodiversity and ecosystem resilience within the planning system. The Welsh Government now mandates strategic action to protect ecological networks and enhance biodiversity.

It states: *"Action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems, and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment."*

A.3 Local policy

Wrexham Local Development Plan 2 (LDP2) 2013 to 2028

The Wrexham Local Development Plan (LDP) was adopted by the Council on 20th December 2023 and covers the period from 2013 to 2028. It forms part of the statutory development plan, alongside Future Wales: The National Plan 2040.

Policy NE2: Local Designations for Nature Conservation and Geological Importance states that development adversely affecting locally designated sites, habitats, and species will only be permitted in exceptional circumstances. It must be demonstrated that there is no satisfactory alternative location and that compensation measures ensure no reduction in the site's overall conservation value.

Policy NE3: Trees, Woodlands and Hedgerows states that development will only be permitted if it does not cause "*unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value or those that provide important ecosystem services.*" Development affecting woodlands should "*support proposals which assist in the respectful and appropriate use and protection of woodlands and boundary edges,*" and "*promote sustainable management to deliver multiple benefits,*".

If adverse effects cannot be avoided, "*adequate mitigation will be required*," including proposals for "*the planting of new trees, woodlands, and hedgerows within the site, ensuring connectivity between proposed and existing green infrastructure.*" Furthermore, strategic Policies SP5 and SP19 support the creation, enhancement, protection, and

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management of green infrastructure, stating that one way to achieve this is through "*increased planting of trees and woodland.*"

Policy SP19: Green Infrastructure requires that development maintains the extent, quality, and connectivity of green infrastructure on or near a site. Where appropriate, it should enhance green infrastructure by:

1. *"Creating new interconnected areas of green infrastructure between the proposed site and the existing network.*
2. *Filling gaps in the existing network to improve connectivity.*
3. *Protecting the features most valuable for both nature and people.*
4. *In instances where loss of green infrastructure is unavoidable, provide mitigation and compensation for the lost assets on a site-specific basis."*

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Appendix B Preliminary Ecological Appraisal – Ramboll 2022

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Wrexham Association Football Club

Kop Development

Preliminary Ecological Appraisal

Intended for
Wrexham Association Football Club

Date
June 2022

Project Number
1620012485

KOP DEVELOPMENT
PRELIMINARY ECOLOGICAL APPRAISAL

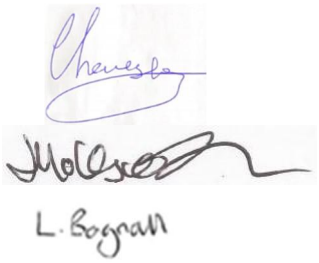
RAMBOLL

KOP DEVELOPMENT
PRELIMINARY ECOLOGICAL APPRAISAL

Project No.	1620012485
Issue No.	04
Date	29 June 2022
Made by	Adam Levesley
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Appendix 2
Relevant Legilsation and Policy

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1. INTRODUCTION

1.1 Background

Ramboll UK Limited ("Ramboll") was commissioned by Wrexham Association Football Club (the "client") to provide a Preliminary Ecological Appraisal (PEA) of the disused 'kop' at the eastern aspect of the site and the land to the immediate east of the 'kop', Mold Road, Wrexham, LL11 2AH (the "site") in advance of the proposal to build a 5,500 seater capacity stand (the Proposed Development). The site is centred on OS grid reference SJ 32879 50949, located within the administrative boundary of Wrexham County Borough Council.

1.2 Objectives

The aim of this report is to provide a PEA of the site (CIEEM, 2017[1]). PEA is the term used to describe a rapid assessment of the ecological features present, or potentially present, within a site and its Zone of Influence (ZoI). The ZoI is the area over which ecological features may be affected by the biophysical changes caused by the Proposed Development and its associated activities. The structure and content of the report is based on current ecological report writing guidance (CIEEM 2017[2] and BSI Standards Institution 2013[3]).

The content of this report is based on the findings of:

- a desk study;
- a bat scoping survey; and
- an extended Phase 1 habitat survey.

The specific objectives of this report are to:

- identify designated nature conservation sites located either within the site or the ZoI of the Proposed Development;
- assess the potential for the site and the ZoI of the Proposed Development to support populations of protected species or species of nature conservation importance[4];
- record the main habitats and features of ecological interest on the site;
- assess the overall ecological importance of the site;
- provide recommendations for any additional further surveys (if required); and
- provide preliminary recommendations for the protection and enhancement of the site's ecological features.

The report is supported by the following appendices:

- Appendix 1: Phase 1 Habitat Map; and
- Appendix 2: Legislation and Policy Context.

[1] CIEEM (2017). Guidelines for Preliminary Ecological Appraisal, Second Edition. Chartered Institute of Ecology and Environmental Management (CIEEM), Winchester

[2] CIEEM (2017) Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.

[3] BSI Standards Institution (2013). BS 42020:2013. Biodiversity – Code of Practice for Planning and Development. BSI Standards Limited, London.

[4] The following species are considered to be of nature conservation importance: i) listed as a national priority for conservation (such as those listed as priority habitats and species under the Environment (Wales) Act 2016; ii) listed as a local priority for conservation, for example in the relevant local Biodiversity Action Plan (BAP); iii) assessed as a threatened or near-threatened species according to International Union for the Conservation of Nature (IUCN) red list criteria; iv) Red or Amber Listed species in national Species of Conservation Concern assessments; v) listed as a Nationally Rare or Nationally Scarce species (e.g. in one of the Species Status Project reviews) or a Nationally Notable species where a more recent assessment of the taxonomic group has not yet been undertaken; and/or vi) endemic to a country or geographic location (including endemic sub-species, phenotypes, or cultural behaviours of a population that are unique to a particular place).

1.3 Proposed Development

The Proposed Development comprises demolition of the disused kop stand and the construction of a new stand for 5,500 spectator seats, inclusive of a 500 capacity hospitality area, with a 600 capacity non-match day exhibition space, new public realm and associated works. The Proposed Development area is shown on the Proposed Site Plan (drawing ref.: 211509-AFL-ZZ-ZZ-DR-A-00101; Appendix 4).

1.4 Legislation and Policy Framework

Various legislation and planning policies refer to the protection of wildlife. These are summarised in Appendix 2 but should not be regarded as a definitive legal opinion.

2. METHODOLOGY

2.1 Desk Study

The purpose of the desk study was to collect existing baseline data about the site and the ZoI such as the location of designated sites or other natural features of potential ecological value such as woodland and ponds. The following ZoI has been considered:

- non-statutory designated sites such as Local Wildlife Sites (LWS), Sites of Importance for Nature Conservation (SINC), Sites of Local Importance for Nature Conservation (SLINC) up to 1 km from the site;
- national statutory designated sites up to 2 km from the site, including National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR); and
- international statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites, up to 10 km from the site.

A third-party local records centre data search was requested from North Wales Environmental Information Service (COFNOD). In addition to this, the Multi Agency Geographic Information for the Countryside (MAGIC) website[5] was searched for supplementary information on statutory sites. This included a search for European Protected Species (EPS) licences issued within 2 km of the site. Supplementary information on the site and its surroundings were obtained from aerial images available from Google™ Earth.

2.2 Extended Phase 1 Habitat Survey

An extended Phase 1 habitat survey of the site was undertaken by Lee Bagnall CEcol CEnv MCIEEM of Ramboll on the 05 and 16 August 2021. Lee is an associate ecologist with over 15 years' experience and holder of Natural Resources Wales (NRW) licences for great crested newt (GCN) *Triturus cristatus* and bats, a full member of the Chartered Institute of Ecology and a Chartered Environmentalist & Ecologist.

The survey involved a site walkover and preliminary assessment of key habitats, land use and ecological features. The main habitats present were recorded using standard Phase 1 habitat survey methodology as described in the Handbook for Phase 1 Habitat Survey (JNCC, 2016[6]).

The site was assessed for its potential to support protected and notable species such as bats and breeding birds and was inspected for signs of any invasive plant species subject to legal controls. This was in order to identify potential ecological constraints and to guide recommendations for further survey requirements for these species.

2.3 Daytime Building and Tree Inspection for Bats

2.3.1 A daytime inspection of buildings, trees and structures was also completed on 05 and 16 August 2021 by Lee Bagnall. The exterior and interior (where access was available) of the sites buildings and trees were visually inspected for field evidence of roosting bats including droppings, urine staining, feeding remains and potential roosting points. In accordance with the guidance outlined in Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition (Collins, 2016[7]) each building was assessed for its potential to support bats. The following building types and features are considered to be of particular suitability to support roosting bats:

- buildings of pre-20th or early 20th century construction;

[5] www.magic.gov.uk, accessed 20 May 2021

[6] Joint Nature Conservation Committee (JNCC) (2016). Handbook for Phase 1 habitat survey – a technique for environmental audit. JNCC Peterborough

[7] Collins J. (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). Bat Conservation Trust (BCT)

- agricultural buildings of brick, stone or timber construction;
- large and complicated roof void(s) with unobstructed flying spaces;
- large (>20 cm) roof timbers with mortise joints, cracks and holes;
- entrances into buildings for bats to fly through;
- poorly maintained buildings such that they provide access points for bats into roofs, walls, bridges, but at the same time not being too cool and draughty;
- roof warmed by the sun e.g. south-facing;
- weatherboarding and/or hanging tiles with gaps;
- undisturbed building roofs and structures;
- buildings and built structures in proximity to each other providing a variety of roosting opportunities throughout the year; and
- buildings and built structures close to good foraging habitat e.g. mature trees, parkland, woodland or wetland.

2.3.2 A ground-level inspection of trees was also undertaken. The following tree features are considered of particular suitability to support roosting bats:

- natural holes;
- woodpecker holes;
- cracks / splits in major limbs;
- loose bark;
- bat, bird or mammal boxes;
- partially detached large-stemmed ivy; and
- other hollows/cavities.

2.3.3 Each building, structure and tree has been classified into a category dependent on the presence of features suitable to support bat roosts. The categories assigned were: Confirmed Roost, High, Moderate, Low and Negligible potential for use by bats. Table 2.1 provides criteria for each of these categories.

Table 2.1: Building, Structure and Tree Bat Roost Potential Categories

Roost Potential	Description
Confirmed	A building, structure or tree that is confirmed to support a bat roost.
High	A building, structure or tree with one or more potential roost site that is obviously suitable for use by larger numbers of bats on a regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate	A building, structure or tree with one or more potential roost site that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
Low	A building or structure with one or more potential roost site that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection and / or suitable surrounding habitat to be used on a regular basis or by a large number of bats (i.e. unlikely to be suitable for hibernation or maternity). Trees of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with very limited roosting potential.
Negligible	Negligible habitat features likely to be used by roosting bats and bats very unlikely to be present.

Notes: Category descriptions drawn from Collins (2016)

2.4 Assessment of Importance of Ecological Features

The importance of ecological features (i.e. designated sites, habitats and species) identified within the ZoI has been assessed using a scale that classifies ecological features within a defined

geographic context in accordance with CIEEM guidelines (2019[8]). The classification uses recognised and published criteria (e.g. Ratcliffe, 1977[9], Wray *et al.* 2010[10]) where the habitats and site were assessed in relation to their size, diversity, naturalness, rarity, fragility, typicalness, connectivity with surroundings, intrinsic value, recorded history and potential value. The following geographic frame of reference has been used for the site:

- International Importance;
- National Importance (Wales);
- Regional Importance (North Wales);
- County/ Borough Importance (Wrexham County Borough);
- Local Importance (Wrexham town);
- Site Importance (limited to the site boundary); and
- Negligible Importance.

A wide range of sources can be used to assign importance to ecological features, including legislation and policy. In the case of designated sites, their importance reflects the geographic context of the designation. For example, sites designated as SACs are recognised as being of importance at an International level. Ecological features not included in legislation and policy may also be assigned importance, due to, for example, local rarity or decline, or provision of a functional role for other ecological features. Professional judgement is used to assign such importance.

2.5 Limitations

The ecological assessment has been undertaken based on CIEEM's 2017 Guidelines for Preliminary Ecological Appraisal, with elements of 2019 Ecological Impact Assessment Guidelines[11], taking a proportional approach to the level of survey effort and reporting required given the urban nature of the site. It should be noted that under normal circumstances it is not appropriate to submit a PEA in support of a planning application because the scope of a PEA is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species. However, in this instance, no further surveys are considered necessary to inform the assessment and a full Ecological Impact Assessment (EcIA) is not recommended as this PEA report contains sufficient information on which the application can be determined.

The extended Phase 1 habitat survey provides a snapshot of ecological conditions and does not record plants or animals that may be present at the site at different times of the year. The survey was undertaken during the optimum April to September Phase 1 habitat survey period when plants are generally visible.

It was not possible to fully inspect the exterior of the kop building due to the presence of dense vegetation on the eastern side of the building. However, the majority of the building could be inspected and this is not considered to present a significant limitation. The requirement for further bat surveys was discussed with the Local Planning Authority (LPA) ecologist and it was agreed that no further bat surveys would be required due to the limited potential for bats to be present.

[8] CIEEM (2019) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute for Ecology and Environmental Management, Winchester

[9] Ratcliffe, D. (1977) A Nature Conservation Review. Cambridge University Press

[10] Wray, S., Wells, D., Long, E. and Mitchell-Jones, T. (2010) Valuing Bats in Ecological Impact Assessment. In Practice, pp 23-25

[11] Chartered Institute of Ecology and Environmental Management (CIEEM), 2019. Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal and Marine. Chartered Institute of Ecology and Environmental Management, London.

The conclusions presented in this report represent Ramboll's best professional judgment based upon the information available and conditions existing as of the date of this report. In performing its assignment, Ramboll must rely upon publicly available information, information provided by the Client and information provided by third parties during desk studies. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll was accurate and complete.

Ramboll is satisfied that this report represents a robust appraisal of the site. If any action or development has not taken place on this land within twelve months of the date of this report, the findings of this survey should be reviewed by a suitably qualified ecologist and may need to be updated in line with CIEEM's 'Advice Note on the Lifespan of Ecological Reports and Surveys' (2019)[12].

[12] Chartered Institute of Ecology and Environmental Management (CIEEM), 2019. Advice Note on the Lifespan of Ecological Reports and Surveys. CIEEM, Winchester. Available online: https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf [Accessed 04/09/2019]

3. BASELINE CONDITIONS

3.1 Desk Study

3.1.1 Landscape Context

The site, set in an urban environment, is located in the north west of Wrexham town. The site is bounded by Mold Road to the south, Crispin Lane to the east and Wrexham Glyndwr University and its associated grounds to the west and north.

3.1.2 Designated Sites

Statutory Sites

The Gatewen Marsh SSSI is situated approximately 1 km north west of the site. The Gatewen Marsh supports a wide variety of botanical species such as greater reedmace *Typha latifolia* and brooklime *Veronica beccabunga*. This designation consists primarily of wetland and marsh habitats. This SSSI is separated from the Proposed Development by urban developments and a major highway (A483) and there is no hydrological pathway (e.g. a watercourse or culverted watercourse) from the development to the site.

There are no other national statutory designated sites within 2 km of the Proposed Development and no direct connectivity to designated sites further afield, such as the river Dee SSSI. The River Dee SSSI is located approximately 10 km east via the nearest hydrological pathway, the River Gwenfro, but the River Gwenfro is located approximately 900 m from the Proposed Development and therefore no impact pathway is identified. There are no other designated sites within 10km of the site and there are also no indirect pathways which could from the site.

On this basis, statutory designated sites are not considered further in this assessment.

Non-Statutory Sites

There are no non-statutory designated nature conservation sites within 1 km of the site. As no impacts are predicted beyond 1 km, the assigned ZoI, non-statutory designated sites are not considered further in this assessment.

3.2 Habitats

3.2.1 General Site Description

The Proposed Development, including proposed compound and laydown areas, occupies an area of approximately 0.85 ha. The Proposed Development site comprises; the existing kop building, with hardstanding to the west, semi-improved neutral grassland to the north interspersed with scattered scrub and ruderal vegetation, and an area of scrub with trees on a steep embankment to the south and east of the existing kop. Further south and east, there is an area of open mosaic habitat.

3.2.2 Broadleaved Semi-natural Woodland

This habitat is found on the steep embankment to the immediate east of the existing kop (Target Note (TN) 7). This habitat comprises early mature/mature trees including sycamore *Acer pseudoplatanus*, Swedish whitebeam *Sorbus intermedia*, goat willow *Salix caprea*, crab apple *Malus sylvestris*, cherry *Prunus* spp., yew *Taxus baccata,* and elder *Sambucus nigra*. Bramble *Rubus fruticosus* and dog rose *Rosa canina* are present within the understorey whilst there is limited ground flora due to the high degree of shading and large amount of fly-tipped material on the embankment.

3.2.3 Buildings

The main building on site is the disused 'kop' structure (TN1) that is scheduled to be demolished. This building is constructed of a single metal skin and is open fronted on its western and southern aspects. Ramboll staff were unable to observe the entirety of the eastern aspect of the building due to the gradient of the embankment, density of the vegetation and amount of fly-tipped material covering the vegetation. Within the building there are small patches of light ivy *Hedera helix* and old man's beard *Clematis vitalba* growing up the eastern and northern wall.

There are two small, brick-built buildings near the southern boundary of the site. The buildings comprise small, one storey brick-built buildings with flat rooves and include a substation, and it is understood these may be demolished to accommodate the new kop. A disused cabin (TN4) is present to the north of the site and it is understood this cabin will be removed as part of the kop redevelopment.

3.2.4 Hardstanding Ground

An area of hardstanding (TN2) is present between the kop building and football pitch which provides a walkway in and out of the grounds leading out onto Mold Road.

3.2.5 Short ephemeral vegetation

This habitat (TN5 & TN9) forms an open mosaic consisting mainly of short ephemeral vegetation but also interlaced with areas of ruderal, flower-rich vegetation and bare, previously disturbed ground. The southern and eastern most extent of this habitat has the greatest coverage of bare ground, comprising stones/rubble remaining from clearance and compaction of material from the demolition of a former development. Within this area there is a limited number of species including mugwort *Artemesia vulgaris*, weld *Reseda luteola* and smooth sow-thistle *Sonchus oleraceus.* Moving west, towards the base of the scrubby embankment and north towards the area of semi-improved grassland areas of open bare ground (TN8) are smaller, with higher vegetation coverage and a higher diversity of species present. Main species present include weld, mugwort, common fleabane *Pulicaria dysenterica*, common poppy *Papaver rhoeas*, wild carrot *Daucus carota*, common speedwell *Veronica persica*, fat hen *Chenopodium album*, nipplewort *Lapsana communis*, scarlet pimpernel *Angallis arvensis*, mallow *Malva sylvestris*, common fumitory *Fumaria officinalis* and prickly lettuce *Lactuca serriola*.

This habitat meets the criteria to qualify as *Open mosaic habitat on previously developed land* which is a Welsh Priority Habitat as listed under Section 7 of the Environment (Wales) Act 2016. This habitat forms an open mosaic with scattered scrub, semi-improved neutral grassland and bare ground.

3.2.6 Scattered Scrub

Scattered scrub (TN6) is present in patches along the peripheries of the semi-improved grassland to the north and north and east of the wooded embankment and open mosaic habitat. Scattered scrub forms localised dense patches and includes species that are typical of urban waste grounds such as butterfly bush *Buddleja davidii*, alongside patches of bramble, dog rose, goat willow *Salix caprea* and ash *Fraxinus excelsior* and rowan *Sorbus aucuparia* saplings. This habitat forms an open mosaic with short ephemeral vegetation, semi-improved neutral grassland and bare ground.

3.2.7 Semi-improved neutral grassland

The semi-improved grassland comprises a small area to the north of the existing kop (TN3). This grassland has frequent areas of discarded materials/ rubbish within the grassland including old tree cuttings, boards, rubble, and bricks. The species here are typical of this habitat type and include; false oat grass *Arrhenatherum elatius*, Yorkshire fog *Holcus lanatus*, bird's-foot trefoil *Lotus corniculatus,* black medic *Medicago lupulina*, red clover *Trifolium pratense*, colt's-foot

Tussilago farfara, creeping cinquefoil *Potentila reptans*, vetch *Viccia ssp.*, ragwort *Senecio jacobaea*, creeping thistle *Cirsium arvense* and field horsetail *Equisetum arvense*. The grassland is broken up by patches of butterfly bush *buddleja davidii*, old man's beard, goat willow, rosebay willowherb *Chamerion angustifolium*, dog rose *Rosa canina*, bramble *Rubus fruticosus* and ash *Fraxinus excelsior* and rowan *Sorbus aucuparia* saplings. This habitat forms an open mosaic with short ephemeral vegetation, scattered scrub and bare ground.

3.2.8 Introduced Shrub

There are several specimens of butterfly bush located within the scrub towards the eastern edge of the site.

3.3 Species

3.3.1 Invertebrates

From the ecological data search obtained via COFNOD, three species of invertebrates were recorded within 1km within the last 10 years. These are of the non-native harlequin ladybird *Harmonia axyridis*, large yellow-faced bee *Hylaeus (Prosopis) signatus* and white-letter hairstreak *Satyrium w-album*. Of these, white-letter hairstreak is the only species located on the UK BAP list and therefore, has additional protections given to it. This species was recorded approximately 578 m to the north west of the site. However, due to the absence of suitable habitat on site this species is not expected to be utilising the site for any of its life stages, but may use the site for commuting purposes. The areas of semi-improved grassland and open mosaic habitat are likely to support a range of common invertebrates and the presence of plants such as weld provide habitat for less common species such as the yellow-faced bee which has been recorded locally. Furthermore, the areas of rubble and debris scattered throughout the site are likely to be used by a range of invertebrates.

3.3.2 GCN/ Amphibians

According to MAGIC, no EPS licences have previously been obtained for GCN within 2 km of the site. From the ecological data search obtained via COFNOD, there were no records of amphibians within 1km for the previous 10 years.

The nearest waterbodies are two ponds and the River Gwenfro, one of these ponds is located approximately 210 m to the south east of the site, whilst the other pond is located approximately 455 m to the south west of the site. The presence of GCN in these ponds is unknown. However, the ponds are separated from the site by the A541 dual carriageway and Wrexham General Train Station which is a partial barrier to the movement of GCN. The River Gwenfro is also separated from the site by the A541, but this watercourse is not expected to support GCN populations as it is not a suitable habitat for GCN.

The railway line to the immediate east of the site could be used by GCNs if they are present locally, but this area will not be affected by the proposed works. GCNs and other amphibians are therefore unlikely to be present on site or use the site for any of their life stages. Due to this, GCNs are not considered further in this assessment.

3.3.3 Reptiles

The ecological data search provided by COFNOD included one record of reptiles in the past 10 years. This was of common lizard *Zootoca vivipara* which was recorded approximately 300 m to the south of the site near the railway line adjacent to the Premier Inn.

There is a large amount of fly-tipped material, rubble and a mosaic of habitats suitable for reptiles within the construction boundary. Whilst the site is isolated due to its setting in an urban environment, as populations of common reptiles are known to be present locally, it is possible

that a small population of common reptiles are present on site. In addition to this, the railway line that lies to the east of the site could be used by reptiles as a potential corridor for them to move along.

3.3.4 Birds

From the ecological data search provided by COFNOD, 43 different species of birds were recorded within the past 10 years. Of these the closest record was of kestrel, located approximately 255 m to the north of the site. The other species records returned by COFNOD include the following species: barn owl *Tyto alba*, black-headed gull *Chroicocephalus ridibundus*, brambling *Fringilla montifringilla*, bullfinch *Pyrrhula pyrrhula*, Canada goose *Branta canadensis*, coal tit *Periparus ater*, cormorant *Phalacrocorax carbo*, cuckoo *Cuclus canorus*, dipper *Cinclus cinclus*, dunlin *Calidris alpina*, dunnock *Prunella modularis*, fieldfare *Turdus pilaris*, garden warbler *Sylvia borin*, goldcrest *Regulus viridis*, green woodpecker *Picus viridis*, herring gull *Larus argentatus*, house martin *Delichon urbicum*, kestrel *Falco tinnunculus*, kingfisher *Alcedo atthis*, lapwing *Vanellus vanellus*, lesser black-backed gull *Larus fuscus*, lesser redpoll *Acanthis cabaret*, long-tailed tit *Aegithalos caudatus*, mallard *Anas platyrhynchos*, marsh tit *Poecile palustris*, mute swan *Cygnus olor*, osprey *Pandion haliaetus*, peregrine *Falco peregrinus*, pied flycatcher *Ficedula hypoleuca*, red kite *Milvus milvus*, redstart *Phoenicurus phoenicurus*, redwing *Turdus iliacus*, reed bunting *Emberiza schoeniclus*, ring-necked parakeet *Psittacula krameria*, snipe *Gallinago gallinago*, song thrush *Turdus philomelos*, starling *Sturnus vulgaris*, swallow *Hirundo rustica*, swift *Apus apus*, whitethroat *Sylvia communis* willow warbler *Phylloscopus trochilus* and woodcock *Scolopax rusticola*. Of these species, barn owl, brambling, fieldfare, kingfisher, osprey, peregrine, red kite and redwing are all Schedule 1 species and bullfinch, cuckoo, herring gull, house sparrow, lapwing, lesser redpoll, marsh tit, reed bunting, song thrush and starling are all UK BAP priority species. Both of these acts of legislation means that they have additional protections added to them and that it is an offence to intentionally disturb them during the breeding season without a valid licence.

The site provides suitability for nesting birds that are typical of the urban environment. These species could nest within the broadleaved woodland to the east of the site and disused nests from previous seasons were also observed with the kop building. Nesting birds may also be present within the scrub to the rear of the building during the nesting bird season (March – August, inclusive). As black redstart has been recorded locally, it is possible that this species could use the area of bare ground and open mosaic habitat during the breeding season. Therefore, clearance works should be undertaken outside of this period where possible. Where not possible, an ecologist should undertake a survey to confirm presence/absence of nesting birds, this is likely to be feasible for the open ground areas and kop structure but may not be possible for the area of scrub to the rear and clearance for this area should be prioritised to avoid the breeding bird season.

3.3.5 Bats

According to MAGIC, no EPS licences have previously been obtained for bats within 2 km of the site. From the ecological data search provided by COFNOD, two species of bat have been recorded in the past 10 years. These are of common pipistrelle *Pipistrellus pipistrellus* and noctule *Nyctalus noctule*. The closest of these records was for common pipistrelle, located approximately 667 m to the north west of the site.

There are two small, brick-built, buildings near the southern boundary of the site. The buildings comprise small, one storey brick-built buildings with flat rooves. It is understood that these buildings, which include a substation, will be demolished. The buildings were observed to be in good condition with no obvious features that could be used by bats for roosting. These buildings are assessed as having negligible potential to support bats. A disused cabin is present to the

north of the site. This building was in a poor state of repair, with a broken window, missing door and hole in the structure. As a result it is well lit and draughty, it is also located in scrub with no clear flight lines to the building. This building is assessed to have negligible potential to support bats. It is understood this cabin will be removed as part of the proposed redevelopment.

Trees within the site are limited to the wooded embankment. The majority of the trees are young and shrub like with no potential to support roosting bats. Although there are several semi-mature to mature trees on the embankment, they were observed to be in good condition with no obvious features that could be used by bats. A small number of trees had light to moderate ivy cover, ivy can provide a potential roosting feature although the ivy coverage observed was light and generally not of sufficient extent to provide roosting opportunities. These trees are assessed to have negligible to low potential to support bats.

The extent of potential foraging and commuting habitat for bats on the site is limited, with the railway embankment to the east providing potential commuting features and the open mosaic habitat providing limited foraging opportunities. Connectivity to suitable bat habitats in the wider landscape is poor, with the exception of the nearby railway, given the highly urbanised nature of the site.

3.3.6 Badger

No badger setts or other field signs indicative of this species were identified on the site during the extended Phase 1 habitat survey. Given the nature of the habitat on the site (predominantly hardstanding), badgers are considered to be absent from the site although likely present in the wider area, however, they were not returned on an ecological data search from COFNOD. Therefore, badgers are not considered further within this assessment.

3.4 Assessment of Important of Ecological Features

Table 4.4 presents the ecological importance of habitats and species present on the site, in accordance with CIEEM guidance. Species assessed as being unlikely to be present on the site are not considered further in this assessment.

Table 3.1: Ecological Importance of Features Present on the Site (in accordance with CIEEM, 2016)

Feature	Ecological Importance	Rationale
Broad-leaved woodland	Site Level	Contributes to biodiversity value of the site, and provides potential habitat for common invertebrates and birds, but value is unlikely to extend beyond the Site Level.
Hardstanding	Negligible	Does not contribute to biodiversity value of the site.
Open mosaic habitat (including short ephemeral vegetation, semi-improved neutral grassland, scattered scrub and bare ground)	County Level	Open mosaic habitat on previously developed land is a Welsh Priority Habitat as listed under Section 7 of the Environment (Wales) Act 2016. Such pioneer habitats are not uncommon in Wales where there are numerous areas of ex industrial land which has been abandoned. However, this habitat is not common in such an urban context as per the Proposed Development and is therefore considered to be important at the County level. This combination of habitats contributes towards the overall biodiversity of the site, and provides potential habitat for common invertebrates, birds and potentially reptiles.

Table 3.1: Ecological Importance of Features Present on the Site (in accordance with CIEEM, 2016)		
Buildings	Negligible	Does not contribute to biodiversity value of the site.
Invertebrates	Local Level	The invertebrate assemblage is likely to be important at the local level, beyond site level, due to the presence of habitats which are not common locally and may support notable invertebrates such as the yellow-faced bee
Birds	Local Level	Vegetation is likely to be used by common foraging bird species and may be used by small numbers of common nesting bird species although it is possible that species such as black redstart could use the pioneer habitats on site which are important locally.
Bats	Local Level	The extent of foraging and commuting habitat on the site is limited and none of the buildings or trees on site are considered likely to be used by bats. However, as bats are a highly mobile species, any bats which do use the site for foraging or commuting are likely to be part of the wider population important at the local level.
Reptiles	Local Level	The site may support a small population of reptiles which are uncommon in the local urban environment.

4. CONCLUSIONS AND RECOMMENDATIONS

This section collates the information gained during the desk study, extended Phase 1 habitat survey and bat scoping survey, presenting the ecological constraints and opportunities and making recommendations for mitigation and compensation. It has been prepared in the context of the Proposed Development of the site.

4.1 Habitats

The loss of a habitat important at the County level and a Welsh Priority Habitat (Open Mosaic Habitat on Previously Developed Land) is likely to occur through construction of the proposed development. The loss of this habitat is likely to occur through site clearance required to accommodate access, compounds and material laydown areas. To minimise loss of this habitat, these activities should be restricted to the southern extent of the site which is predominantly bare ground, thereby retaining open mosaic habitat to the north.

If this cannot be achieved through design, the loss of this habitat should be compensated for onsite and this could be achieved through the inclusion of a biodiverse roof on the new kop building. This would provide similar conditions to those on site within which the open mosaic habitat has developed. In addition, areas of bare ground could be left to naturally revegetate as designated as wildlife areas. Should the open mosaic habitat not be affected by the kop development, consideration by the client should be given as to the future development plans for this area such that a biodiverse roof can still be incorporated at part of this development to compensate for any future loss of this habitat.

Potential temporary, indirect impacts on retained habitats can be controlled through a CEMP. This could include dust control measures to prevent construction dust impacting the retained habitats and measures to prevent contaminated run-off leaching into adjacent habitats.

Retained habitats should be managed to prevent the spread of the invasive butterfly bush as without management this plant is likely to progressively dominate the site.

4.2 Species

No further species surveys are required but the following recommendations should be implemented prior/during site clearance as appropriate.

4.2.1 Invertebrates

Areas of open mosaic habitat should be retained where possible. As above, where this cannot be achieved compensatory habitat should be provided on site. This could be in the form of a biodiverse roof and ensuring that any landscape planting includes a range of species which are valuable to invertebrates, in particular pollinators. Refuges should be provided through provision of log piles, pebbles or insect boxes (‘bug hotels’) in newly created habitats to replace the loss of existing habitat provided by the rubble and debris scattered throughout the existing site.

4.2.2 Birds

All wild birds are protected whilst nesting, with destruction of active nests, killing or injuring a wild bird constituting offences under the Wildlife and Countryside Act 1981 (as amended). Loss of vegetation would remove suitable nesting habitat for breeding birds. Were this to take place during the breeding season (March to August inclusive), there would be a risk that nests would be damaged or destroyed during the process. Therefore, vegetation removal should take place between September and February. If this is not possible, a nesting bird check should be undertaken by an experienced ecologist prior to vegetation removal where practical to do so (i.e. this may not be possible for areas of dense scrub). If evidence of nesting birds is identified, work

should stop and a suitable no-work buffer zone around the nest area should be installed, until such time as chicks have fledged.

In addition to this, birds listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), such as black redstart, are afforded additional protection and it is an offence to intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird. Should this species be present, it would be necessary to avoid disturbing it during site clearance/development which may mean setting up an exclusion zone which neutralises part of the site until breeding is complete.

Ten bird boxes should be installed on retained trees or integrated into the new building to compensate for the loss of nesting habitat associated with vegetation removal during site clearance.

4.2.3 Bats

It is recommended that the trees on the wooded embankment which have light-moderate ivy cover are soft-felled under an ecological watching brief on a precautionary basis.

Potential impacts upon bats could arise from light spill onto retained habitats. This could potentially cause disturbance to foraging and commuting bats. The lighting strategy for the site should therefore be devised to ensure that spillage of artificial lights is minimised. In addition to complying with building regulations, the lighting scheme should be designed following guidelines from the BCT Bats and Lighting in the UK[13]. These include:

- using low- or high-pressure sodium lights or LEDs instead of mercury or metal halide lamps, where possible, and avoiding the use of lamps greater than 150W;
- directing lighting to where needed and avoiding spillage, including the use of hoods, cowls, shields etc. to avoid spillage onto areas of vegetation; and
- only lighting areas which need to be lit and using the minimal level of lighting required to comply with building regulations.

4.2.4 Reptiles

Potential impacts upon reptiles could arise during site clearance, during which there is potential to disturb and potentially injure/kill reptiles in additional to loss of suitable habitat for reptiles. To protect reptiles potentially using the site, site clearance should be undertaken under a Precautionary Working Method Statement (PWMS) which will include measures to minimise the risk to reptiles through careful site clearance with ecological supervision. Should reptiles be found to be present it is anticipated that this would be in small numbers and sufficient terrestrial habitat could be retained to the north of the site, in the area of semi-improved grassland, scrub and short-ephemeral vegetation. This area is not located within the footprint of the Proposed Development but is located within the construction boundary and it would be necessary to limit impact on this area in keeping with the recommendations to retain the open mosaic habitat as specified in Section 4.1

4.3 Opportunities for Ecological Enhancement

Additional biodiversity enhancement measures could include (but are not limited to) the following:

- provision of green walls by the incorporation of climbing plants on one or more elevations of the new stand;

[13] Bat Conservation Trust, 2018. Bats Artificial Lighting in the UK. Guidance Note 08/18.

- Creation of mini ponds or rain gardens using collected surface water and redirecting to a designated area;
- enhancement for bats provided through the provision of bat boxes installed upon suitable trees or buildings or integrated into the new building on the site; and
- enhancement for hedgehogs through the provision of suitable nest boxes.

5. SUMMARY

The table below summarises the proposed ecological mitigation and compensation measures:

Table 5.1: Ecological Importance of Features Present on the Site (in accordance with CIEEM, 2016)

Feature	Mitigation	Compensation
Open mosaic habitat	Minimise loss of habitat by restricting compound and laydown areas to the southern extent of the site.	Inclusion of a biodiverse roof or roof section on the new kop building.
Invertebrates	Minimise loss of habitat by restricting compound and laydown areas to the southern extent of the site.	Inclusion of a biodiverse roof or roof section on the new kop building Ensure landscape planting includes pollinator friendly species Provide refuges through log piles, or insect boxes.
Reptiles	To protect reptiles potentially using the site, site clearance should be undertaken under a Precautionary Working Method Statement (PWMS) which will include measures to minimise the risk to reptiles through careful site clearance with ecological supervision.	
Birds	Undertake clearance outside of the nesting bird season between September and February.	Ten bird boxes should be installed on retained trees or integrated into the new building to compensate for the loss of nesting habitat associated with vegetation removal during site clearance.
Bats	Soft fell trees on the wooded embankment which have light to moderate ivy cover under a watching brief. Use of a sensitive lighting strategy to reduce unnecessary light spill onto retained and new habitats.	
Ecological enhancement opportunities	Provision of green walls by the incorporation of climbing plants on one or more elevations of the new stand. Creation of mini ponds or rain gardens using collected surface water and redirecting to a designated area. Enhancement for bats provided through the provision of bat boxes installed upon suitable trees or buildings or integrated into the new building on the site. Enhancement for hedgehogs through the provision of suitable nest boxes.	

APPENDIX 1
PHASE 1 HABITAT MAP



Legend

- Construction Boundary
- A2.2 Scrub - scattered
- Target note
- A1.1.1 Broadleaved woodland - semi-natural
- A2.2 Scrub - scattered
- B2.2 Neutral grassland - semi-improved
- J1.3 Cultivated/disturbed land - ephemeral/short perennial
- J3.6 Buildings
- J4 Bare ground
- Hardstanding

Figure Title
Figure 1: Phase 1 Habitat Map

Project Name
Project Name

Project Number	Figure No.
RUK2021N00485	1
Date	**Prepared By**
August 2021	NJ
Scale	**Issue**
1:750 @A3	1

Client
Wrexham AFC

RAMBOLL

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community, Esri Community Maps Contributors, Esri UK, Esri, HERE, Garmin, INCREMENT P, METI/NASA, USGS

APPENDIX 2
RELEVANT LEGILSATION AND POLICY

Ecological features are protected under various United Kingdom (UK) and European legislative instruments. These are described below. European legislation is not included as it is incorporated in UK legislation by domestic provisions.

Legislation

The Conservation of Habitats and Species Regulations 2017

The Habitats Directive (Council Directive 92/43/EEC)[14] came into force in 1992 and provides for the creation of a network of protected wildlife areas across the European Union (EU), known as 'Natura 2000'. The Natura 2000 network consists of Special Areas of Conservation (SAC) designated under the Habitats Directive and Special Protection Areas (SPA) designated under the Birds Directive (Council Directive 79/409/EEC)[15]. These sites are part of a range of measures aimed at conserving important or threatened habitats and species.

The Conservation of Habitats and Species Regulations 2017[16] (commonly known as the 'Habitats Regulations') transposes the Habitats Directive into national law and set out the provisions for the protection and management of species and habitats of European importance, including Natura 2000 sites. The 2017 bill consolidated all previous versions of the regulations and subsequent amendments since initial transposition, bringing them all under the single heading, and made some minor amendments. It extends to England and Wales, and to a limited extent Scotland and Northern Ireland. Further amendments were made via The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018[17] to ensure they reflect recent European case law (C-323/17 People Over Wind and Sweetman v Coillte Teoranta) in relation to the assessment of plans and projects on sites protected under Council Directive 92/43/EEC on the conservation of natural habitats of wild fauna and flora (the 'Habitats Directive'). In Scotland, the Habitats Directive is transposed through a combination of the Habitats Regulations 2010 (in relation to reserved matters) and the Conservation (Natural Habitats &c.) Regulations 1994. The Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) transposes the Habitats Directive in relation to Northern Ireland.

In addition to providing for the designation and protection of Natura 2000 sites, the Habitats Regulations provide strict protection for plant and animal species as European Protected Species. Derogations from prohibitions are transposed into the Habitats Regulations by way of a licensing regime that allows an otherwise unlawful act to be carried out lawfully for specified reasons and providing certain conditions are met. Under the Habitats Regulations, competent authorities have a general duty, in the exercise of any of their functions, to have regard to the Habitats Directive and Wild Birds Directive including in the granting of consents or authorisations. They may not authorise a plan or project that may adversely affect the integrity of a European site, with certain exceptions (considerations of overriding public interest).

The Conservation of Habitats and Species Regulations 2017, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, require the Secretary of State and Welsh Ministers to secure compliance with the requirements of the Nature Directives. Any new powers in the 2019 Regulations must be exercised in line with the Directives and retained EU case law up to 1 January 2021.

[14] European Commission, 1992. Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

[15] European Commission, 1979. Council Directive 79/409/EEC on the conservation of wild birds.

[16] Her Majesty's Stationery Officer (HMSO), 2017. The Conservation of Habitats and Species Regulations 2017. HMSO.

[17] Her Majesty's Stationery Officer (HMSO), 2018. The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018. HMSO.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019[18]

SACs and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- existing SACs and SPAs; and
- new SACs and SPAs designated under these Regulations.

Any references to Natura 2000 in The Conservation of Habitats and Species Regulations 2017, as amended and in guidance now refers to the new national site network. Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:

- fulfil the commitment made by government to maintain environmental protections
- continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions

Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs, and may be designated for the same or different species and habitats. All Ramsar sites remain protected in the same way as SACs and SPAs.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 establish management objectives for the national site network. These are called the network objectives.

The UK Government and devolved administrations (in Wales, Northern Ireland and Scotland) will cooperate to manage, and where necessary, adapt the network to contribute towards meeting the network objectives.

Any references in the 2017 Regulations to meeting the 'requirements of the Directives' includes achieving the network objectives.

The appropriate authorities may publish guidance relating to these requirements. The appropriate authorities are the Secretary of State for Environment, Food and Rural Affairs in England and the Welsh Ministers in Wales.

The network objectives are to:

- maintain or, where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a favourable conservation status (FCS)
- contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive

The appropriate authorities must also have regard to the:

- importance of protected sites
- coherence of the national site network
- threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs

The network objectives contribute to the conservation of UK habitats and species that are also of pan-European importance, and to the achievement of their FCS within the UK.

[18] Secretary of State (2019) The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Her Majesty's Stationery Office (HMSO)

The Countryside and Rights of Way Act 2000

The Countryside and Rights of Way Act 2000[19] primarily extends to England and Wales. It provides a new statutory right of access to the countryside and modernises the rights of way system, bringing into force stronger protection for both wildlife and the countryside.

The Act is divided into five distinct sections, Part III is of relevance to ecology:

- Part III – Nature Conservation and Wildlife Protection: The Act details measures to promote and enhance wildlife conservation. These measures include improving protection for Sites of Special Scientific Interest (SSSI) and increasing penalties for deliberate damage to SSSIs. Furthermore, the Act affords statutory protection to Ramsar Sites which are wetlands designated under the International Convention on Wetlands[20].

The Wildlife and Countryside Act 1981 (As Amended)

The Wildlife and Countryside Act 1981 (as amended)[21] forms the basis of much of the statutory wildlife protection in the UK. Part I deals with the protection of plants, birds and other animals and Part II deals with the designation of SSSIs.

This Act covers the following broad areas:

- Wildlife – listing endangered or rare species in need of protection and creating offences for killing, disturbing or injuring such species. Additionally, the disturbance of any nesting bird during breeding season is also noted as an offence, with further protection for species listed on Schedule 1. Measures for preventing the establishment of non-native plant and animal species as listed on Schedule 9 are also provided;
- Nature Conservation – protecting those sites which are National Nature Reserves (NNR) and SSSIs;
- Public Rights of Way – placing a duty on the local authority (to maintain a definitive map of footpaths and rights of way. It also requires that landowners ensure that footpaths and rights of way are continually accessible; and
- Miscellaneous General Provisions.

The Act is enforced by local authorities.

Natural Environment and Rural Communities Act 2006

Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006[22], public authorities must show regard for conserving biodiversity in all their actions. Public authorities should consider how wildlife or land may be affected in all the decisions that they make. The commitment to the biodiversity duty must be measured by public authorities.

Section 41 also requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England.

[19] Her Majesty's Stationery Officer (HMSO), 2000. The Countryside and Rights of Way Act 2000. HMSO.

[20] United Nations Educational, Scientific and Cultural Organization (UNESCO), 1971. Convention on Wetlands of International Importance especially as Waterfowl Habitat, as amended in 1982 and 1987. Ramsar, Iran Published in Paris, 1994.

[21] Her Majesty's Stationery Office (HMSO), 1981. The Wildlife and Countryside Act 1981 [as amended in Quinquennial Review and by the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006]. HMSO.

[22] Her Majesty's Stationery Office (HMSO), Natural Environment and Rural Communities Act 2006. HMSO.

Protection of Badgers Act 1992

The Protection of Badgers Act 1992[23] consolidated previous legislation relating specifically to badgers. The Act makes it an offence to kill, injure or take a badger, or to damage or interfere with a sett unless a licence is obtained from a statutory authority (i.e. Natural England).

Wild Mammals (Protection) Act 1996

The Wild Mammals (Protection) Act 1996[24] makes it an offense for any person to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering. There are certain exemptions including acts of mercy and acts made lawful by means of hunting, shooting, coursing or pest control activities.

Policy

Biodiversity in the Planning Process

Administrative and policy guidance on the application of some of these statutory obligations is provided through relevant government policy guidance and advice. In England, this includes National Planning Policy Framework 2012, National Planning Practice Guidance, Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System, Biodiversity 2020 and Natural Environment White Paper The natural choice: securing the value of nature.

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Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System

This circular[25] provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the NPPF and PPG.

Natural Environment White Paper. The Natural Choice: Securing the Value of Nature

The Natural Environment White Paper[26] outlines the Government's vision for the natural environment over the next 50 years, shifting the emphasis to an integrated landscape-scale approach. It describes the actions that will be taken to deliver that goal.

Nature Recovery Action Plan 2020 - 2021

The Nature Recovery Action Plan (NRAP) for Wales was originally published in December 2015 as the Nature Recovery Plan. It sets out how the United Nations Environment Programme's Convention on Biological Diversity's (CBD) Strategic Plan for Biodiversity and the associated Aichi Biodiversity Targets for 2011-20 in Wales would be addressed, and is the National Biodiversity Strategy and Action Plan for Wales.

[23] Her Majesty's Stationery Office (HMSO), 1992. Protection of Badgers Act 1992. HMSO.

[24] Her Majesty's Stationary Office (HMSO), Wild Mammals (Protection) Act 1996. HMSO.

[25] Office of the Deputy Prime Minister, 2005. Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. Available at: https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005

[26] Department for Environment, Food and Rural Affairs (Defra), 2011. Natural Environment White Paper. The natural choice: securing the value of nature. Available at: https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature

Biodiversity Action Plans (BAP)

In 1994, the Government produced the UK Biodiversity Action Plan (BAP)[27], a national strategy for the conservation of biodiversity. This led to the creation of the UK Biodiversity Steering Group, which has listed 1,150 Species Action Plans (SAPs) and 65 Habitat Action Plans (HAPs). Regional and District/Borough BAPs apply the UK BAP at a local level.

From July 2012, the 'UK Post-2010 Biodiversity Framework'[28] succeeds the UK BAP. This is a result of a change in strategic thinking following the publication of the 'Convention on Biological Diversity's Strategic Plan for Biodiversity 2011-2020'[29] and its 20 'Aichi targets'[30], at Nagoya, Japan in October 2010, and the launch of the new EU Biodiversity Strategy (EUBS) in May 2011.

The UK Post-2010 Biodiversity Framework constitutes the UK's response to these new 'Aichi' strategic goals and associated targets. The Framework recognises that most work which was previously carried out under the UK BAP is now focussed on the individual countries of the UK (and Northern Ireland) and delivered through each countries' own strategies.

Following the publication of the new Framework, the UK BAP partnership no longer operates. However, many of the tools and resources originally developed under the UK BAP remain of use. The UK list of priority species has been used to help draw up statutory lists of priorities in England, Scotland, Wales and Northern Ireland. For England, this is in line with Section 41 of NERC.

Local Planning Policy

Wrexham Local Development Plan 2 (LDP2) Strategic Policies

The Wrexham Local Development Plan (LDP) was adopted in October 2017. The applicable Policy – Local Planning Guidance Note 32 (Biodiversity & Development) is contained with Wrexham Council Local Planning Guidance Notes. The Local Plan aims to safeguard and enhance biodiversity through the identification and protection of sites and/ or species of international, national, and local importance.

[27] Her Majesty's Stationery Office (HMSO), 1994. Biodiversity: The UK Action Plan. HMSO.

[28] JNCC and Defra (on behalf of the Four Countries' Biodiversity Group), 2012. UK Post-2010 Biodiversity Framework. July 2012. jncc.defra.gov.uk/pdf/UK_Post2010_Bio-Fwork.pdf

[29] Available at: https://www.cbd.int/sp/

[30] Available at: https://www.cbd.int/sp/targets/

APPENDIX 3
PHOTOGRAPHIC APPENDIX

Target Note	Photograph
TN1 – Disused kop	
TN2 - Hardstanding	

Target Note	Photograph
TN3 – Semi-improved neutral grassland	

Target Note	Photograph
TN4 – Disused cabin	
TN5&9 – Short ephemeral vegetation with woodland embankment and butterfly bush scrub beyond	

Target Note	Photograph
TN6 – Scattered scrub	
TN7 – Broad-leaved semi-natural woodland	

Target Note	Photograph
TN8 – Bare ground at the southern extent of the site looking towards Mold Road	

APPENDIX 4
PROPOSED SITE PLAN

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KEY

OTHER LAND IN CLUB OWNERSHIP

PLANNING APPLICATION BOUNDARY

NEW KOP END STAND

SHOP ENTRANCE/ TICKET OFFICE

HOSPITALITY ENTRANCE

GA PUBLIC REALM

GA ENTRANCE

GA EXIT

GOODS ENTRANCE

SUB-STATION ACCESS

MOLD ROAD

CRISPIN LANE

NOTES
All dimensions and levels to be checked on site

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rev no.	rev date	rev by	description
P6	27.06.22	WR	DRAFT PLANNING ISSUE
P5	13.06.22	WR	WIP Issue
P4	20.05.22	WR	Boundaries Updated
P3	16.05.22	WR	Site Boundaries Added
P2	13.05.22	WR	WIP ISSUE
P1	08.04.2022	WR	First Issue - Floodlight positions added for coordination purposes

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key plan

drawing title
Proposed Site Plan

AFL job number 211509 | scale @ A1 1 : 500 | drawn VR | checked NT | rev date 27.06.22

dwg purpose PLANNING | status S2 | rev P6

bim project origin zone level type role 5-digit no.
211509-AFL-ZZ-ZZ-DR-A-00101

1 Proposed Site Plan
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