Leigh Ecology Ltd
Tel 01606 892032 Email Roy@leighecology.co.uk www.leighecology.co.uk

BWRIAD / PROPOSAL: CHANGE OF USE OF LAND FOR USE AS CHRISTMAS TREE FARM AND OUTDOOR RECREATION CENTRE TO INCLUDE REINDEER CENTRE

LOCATION: Land South of Llay Road, Cefn Y Bedd, Wrexham, LL12 9UG

Ecological Response for further information request dated 02/12/25.

Introduction

This document provides further information as requested By Rebecca Price (YGC) in the comments sent to the LPA and received by email dated 2nd December 2025.

Previous PEA and Rebuttal Documents

The comments regarding the format of the previous documents were noted. Given the status of the proposal and the comments from the previous biodiversity officer reviewing the submission found this acceptable, it was considered that sufficient information was provided, and, in a format, that has been previously submitted and accepted on many previous planning applications.

General Working Safeguards

Immediately prior to commencement of any works on site (including but not limited to vegetation clearance/stripping, erection of fencing etc.) a suitably experienced ecologist should be appointed by the developer to carry out a search to ensure the status of the site has not changed.

• Prior to commencement of works, to ensure compliance with the ecological mitigation/method statement and to avoid any impacts on badgers, the project manager will take responsibility or appoint a person to be responsible for the following:

- compliance with legal consents and planning conditions relating to protected species,

- installation of physical protection measures and sensitive working practices during construction,

- regular inspection and maintenance of physical protection measures and monitoring of working practices during construction.

• All contractors and site personnel should be briefed on the presence of protected species in the area and the necessary precautionary measures that are required.

• Any excavations, trenches or pits relating to the development should be covered overnight to avoid entrapment of badgers or if left open an egress point e.g., mammal ladders or a roughened plank, will be placed within the excavation to form a ramp to allow badgers to escape. All excavations should be inspected each morning to ensure no badgers have become trapped overnight. If an animal is found, an ecologist must be contacted immediately for further advice.

• The storage of topsoil or other 'soft' building materials on site must be given careful consideration. Badgers may use these mounds in which to create new setts. Any mounds should be kept to a minimum and will be subject to daily inspections.

• All chemicals or materials that may harm badgers must be safely stored away from potential badger habitat and contained in such a way that they cannot be accessed or knocked over by otters or other protected species.

Bats

It is envisaged that only lighting will be located around the building on site. In this case it is suggested that they are linked to a passive infra-red system with a 1min lighting period.

These lights will be fixed on the building and will be fitted with a cowl in order to prevent any light flooding on to bat commuting or foraging features.

No lighting will be in the areas of bat activity such as trees, hedgerows, or over the lake.

Therefore, it is anticipated that there will be no impacts related to lighting on site.

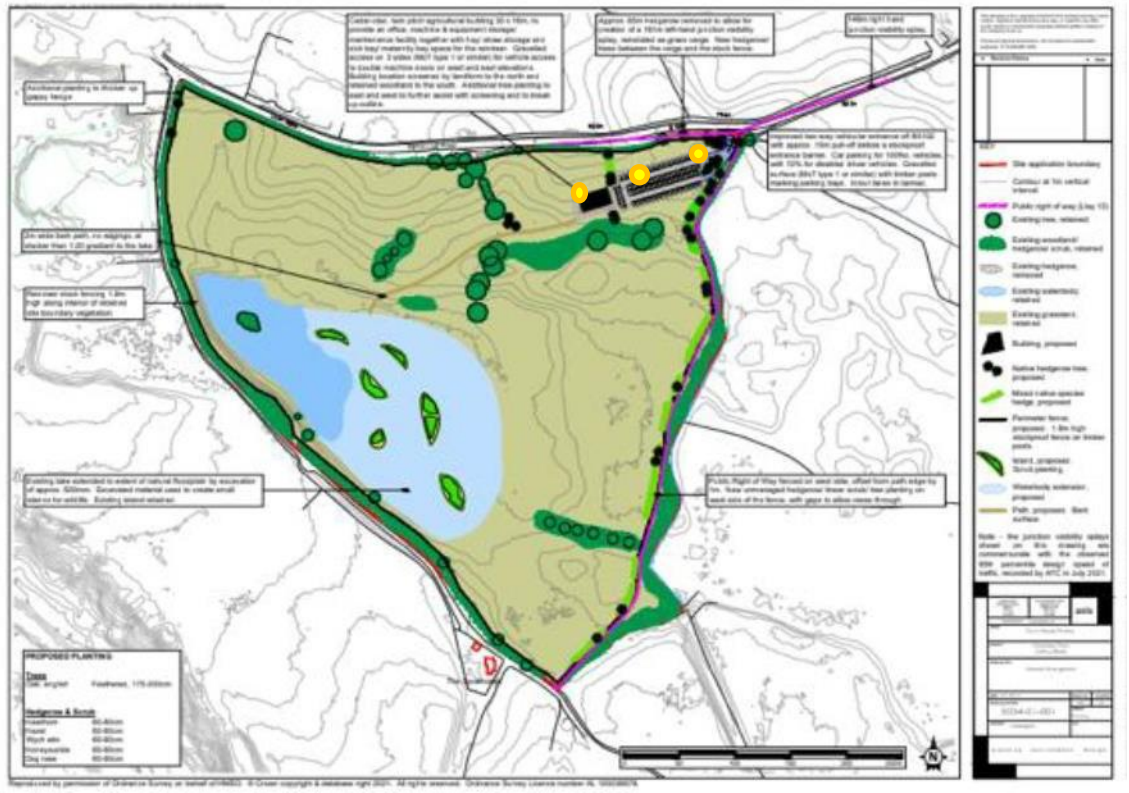


Fig 1: Bat Lighting Plan Light Location

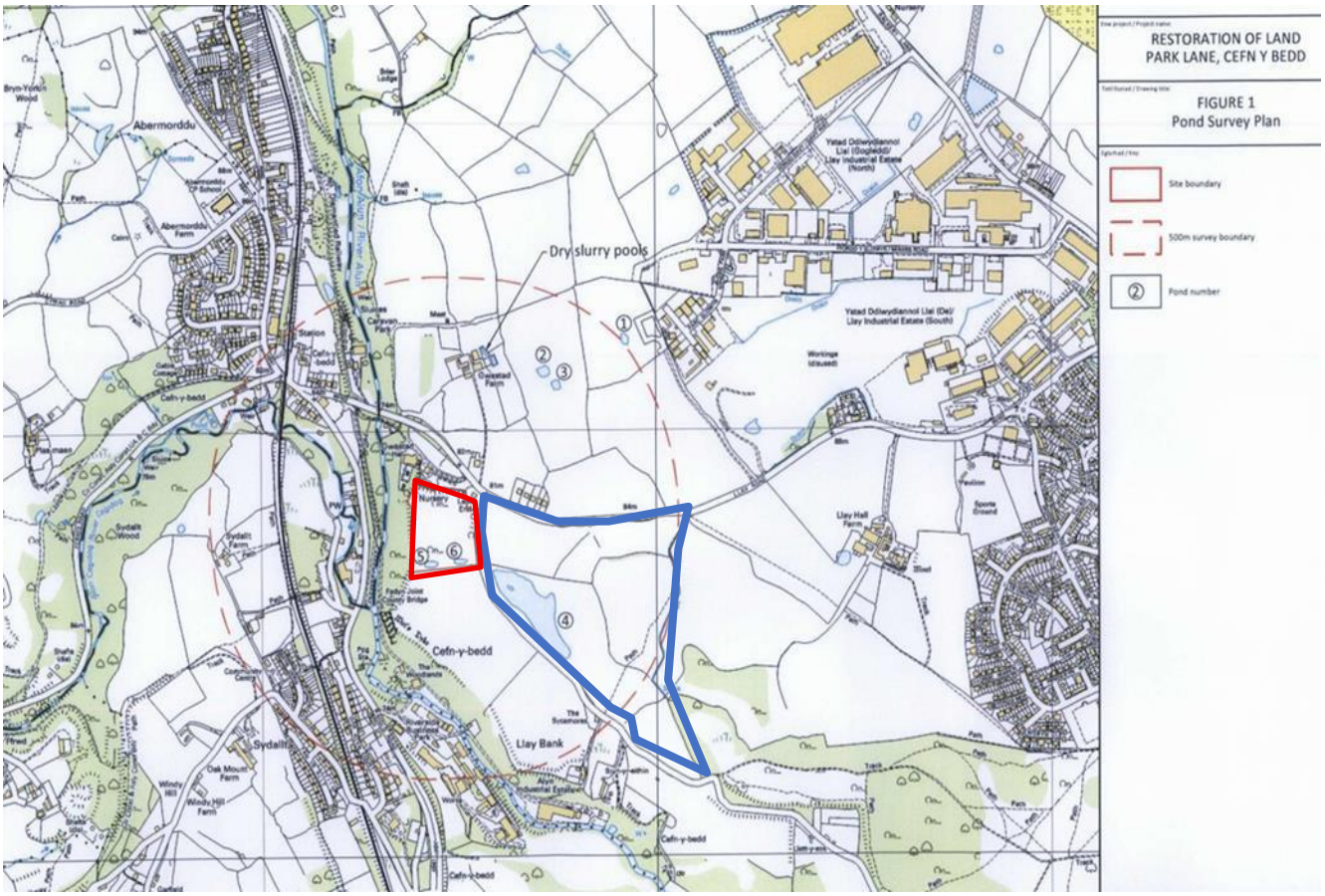
Bat Boxes will be fitted to trees within the foraging and commuting habitat

Great Crested Newts (GCN)

Impact Assessment

Data provided by Natural Resources Wales is shown below, pond 6 on the plan below (Fig 2 and 3) is known to contain GCN. This was confirmed in the 2010 and 2013 surveys, the pond is located 64m west of the site boundary.

The ponds on site were dry when visited to undertake the eDNA sampling during May. In terms of impacts, both ponds are located to the southeast of the site and out with the red line boundary. Therefore, given both ponds are over 150m from any proposed works, they are unlikely to suffer any negative impacts from the proposals. Additionally, a plan to develop a GCN safe area will be provided in the habitat surrounding these ponds. Therefore, it is suggested that no further GCN or eDNA surveys are required to inform the proposal.



No access was allowed to pond 5 and 6 to update the surveys in order to inform this application, however, in light of the previous presence it was concluded that it is likely that GCN from the pond may use the terrestrial habitat within the western boundary of the proposal site to hibernate, commute and forage. No impacts will occur on ponds 5 and 6 containing the GCN.

The temporary loss of terrestrial areas from the TAF impact will include scrub areas and hedgerows.

Therefore, any impact on terrestrial habitat will have a negative effect on the GCN population. However, given the pond and the site are fragmented by Park Road, it is likely that whilst it is accepted that some GCN may cross the road, this will be in more limited numbers, and will be initially prevented accessing the site by the amphibian fencing. Then in the long-term provision of good terrestrial habitat and purpose-built hibernacula will help to improve the population of GCN.

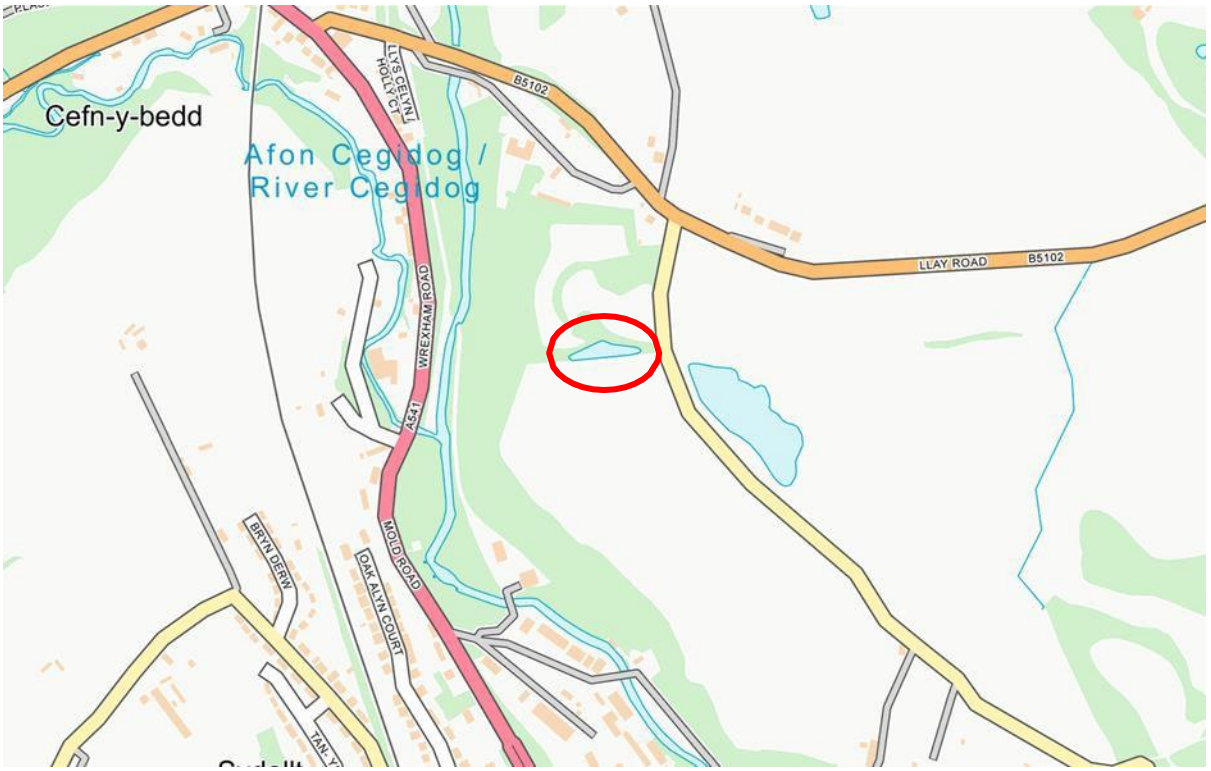


Fig 3: The location plan showing the pond containing GCN circled in red.

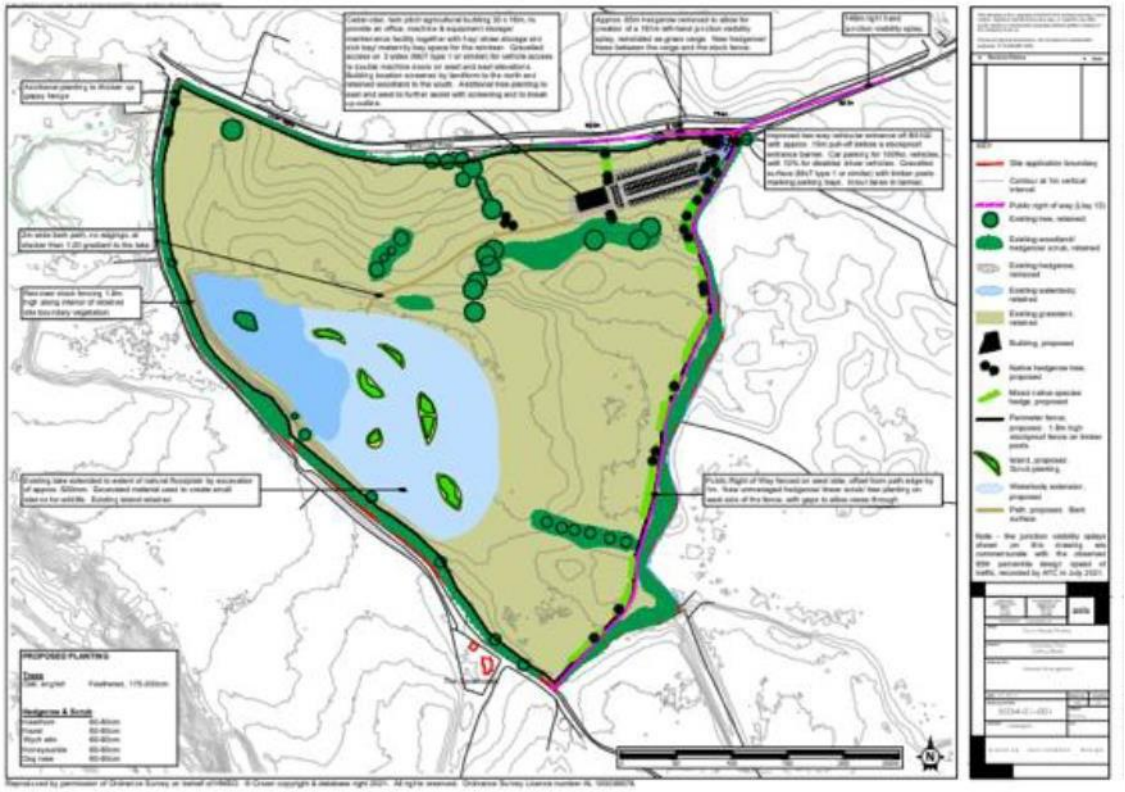


Fig 4: The proposal plan.

Mitigation Proposals

During the period of excavation activities to enlarge the lake is undertaken, temporary amphibian fencing is to be erected along the northern and western boundary hedges to prevent GCN and other amphibians entering the site and being injured or killed. This work will require a detailed method statement and NRW Licence. The TAF design will depend on the time of year the works are undertaken, a barrier fence or a one-way 45deg will be specified, as required.



Fig 5: Amphibian Mitigation Plan

Amphibian Safeguarding Method Statement

This statement should be followed for the initial phase of works within the site, which may affect the surrounding terrestrial habitat. Minor or short term destructive or disturbance works will also follow this Method Statement to ensure legal compliance and to ensure the favourable conservation status of the species is not compromised.

The following measures will be adopted throughout the construction period of the proposed development.

- A toolbox talk covering the following points will be presented to the developer undertaking the construction activities;

- A fingertip search by a licensed ecologist of the proposed construction area immediately prior to any turf removal;

- Should any trenches or excavations be required, an escape route for animals that enter the trench must be provided, especially if left open overnight. Ramps should be no greater than of 45 drees in angle. Ideally, any holes should be securely covered;

- All excavations left open overnight or longer should be checked for animals prior to the continuation of works or infilling;

- There will be no impacts on surrounding hedgerows. All hedgerows will be maintained throughout the construction programme;

- Any excavated material should be placed on boards or sheeting to reduced damage to the grass sward (if present). If left overnight this material should be searched prior to being used as infill;

- Back filling should be completed immediately after any excavations, ideally back filling as an ongoing process to the work in hand;

• **If a GCN is found during the construction activities, work must stop immediately and contact should be made with a licensed, qualified ecologist, who will liaise with Natural Resources Wales.**

Habitat Enhancements

It is proposed that a number of mitigation measures are provided in order to maintain and enhance the long-term conservation status of GCN on site.

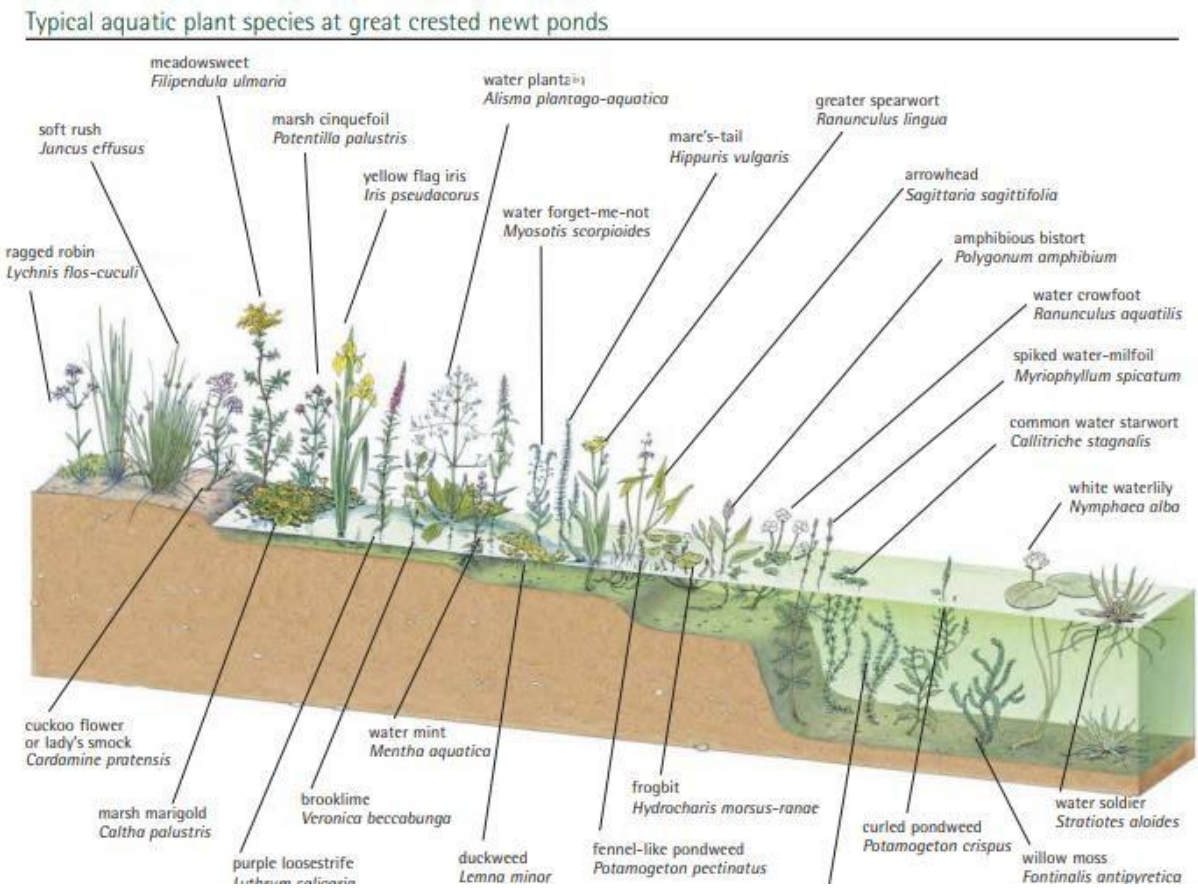
Two purpose-built hibernacula are being proposed within the habitat corridor located on the western boundary of the site as indicated on Fig 4.



A pond which is currently ephemeral will be re profiled and lined with clay allowing retention of water through the year, therefore providing breeding habitat for GCN and other amphibians.

It is planned the shoreline and aquatic zones will be planted with locally sourced vegetation as shown below.

The pond will be for wildlife only and not to be stocked with fish. Ongoing monitoring and management will ensure the longevity of the waterbody for amphibians and other wildlife.



Otter

It is accepted that Otter will frequent the lake on site to forage and during commuting activities between key watercourses.

Given this it is important that otters are protected on site.

Impacts

No otter holts were noted during the otter surveys undertaken therefore as mentioned above, it is considered that the proposal site may be used by otters for foraging and commuting between water courses.

It is, therefore proposed that a series of safeguards are followed, the general working safeguards will prevent most impacts on otters however more specific safeguards should be executed.

Try to avoid impacts in the first instance, e.g. by:

- Not working on or near the water body and known otter habitat;
- Not disturbing otters e.g. by leaving a buffer zone along a river and around resting places;
- Avoiding night works (in darkness and at dusk and dawn) in freshwater areas;
- Not obstructing otters' access to paths/open water;

Post construction safeguards are also proposed:

- No night-time water-based activities;
- No lighting over the lake or adjacent shoreline;
- Ongoing Otter activity monitoring should be undertaken and further advice taken if any potential conflicts are foreseen.

Water Vole

We advise that the surveys and assessments in respect of water vole are satisfactory when considered with extant information. No water vole habitat occurs on site.

Biosecurity on Site

Biosecurity refers to a set of precautions that aim to prevent the introduction and spread of harmful organisms. These include non-native tree pests, such as insects, and disease-causing organisms, called pathogens, such as some bacteria and fungi.

Pests and diseases can be transported between or within sites via a number of pathways, including:

- live plant and tree products, such as potted plants;
- timber and wood packaging materials (WPM), such as shipping crates and pallets – find out more if you're an importer using WPM;
- dirty tools, kit, machinery and vehicles, such as chainsaws, boots and all-terrain vehicles.

- soil and organic material, such as leaf litter
- natural methods, such as wind and water

Preventative Measures to be implemented.

Think kit':

Make sure all equipment, including boots, clothing, ropes and saws, is free from soil and organic material before entering and leaving a site.

regularly clean ropes as per the manufacturer's guidance or use dedicated ropes for particular sites.

clean and disinfect chainsaws, pruning saws and other cutting tools as part of routine maintenance, and before using them on a new site.

'Think transport':

remove any build-up of soil and organic material on vehicles and machinery, including cabs, wheels and foot wells, before leaving each site

use proper off-site wash-down facilities regularly.

'Think trees, plants, and materials':

responsibly source planting stock through nurseries or suppliers that adhere to national standards such as the Plant Health Management Standard, or that have their own biosecurity policy in place that you trust.

source planting stock from pest and disease-free areas

keep accurate, up-to-date records of all purchases and supplies to assist with tracing exercises in the event of an outbreak.

regularly monitor plant and tree stock for signs of ill-health and report any suspect symptoms using TreeAlert.

if you're responsible for importing or moving plants, check your plant passport and registration requirements with APHA before doing so.

source landscaping materials from pest-and-disease-free areas only be aware of any restrictions in place, or phytosanitary (plant health) measures and treatments required when importing certain materials or their packaging.

specify British-grown plants when sourcing planting stock, to reduce the risk of an accidental introduction of invasive non-native pests or diseases.

When working on a site that is subject to a Statutory Plant Health Notice (see below), or where a pest or disease has been confirmed, you must follow any additional biosecurity guidance for that pest or disease in addition to the measures above.

If you must remove infected or infested material from such sites for safety reasons, you must ensure that:

it’s kept separate from other arisings

it’s not used for mulch or firewood

it’s disposed of at a licensed handling facility, or through deep burial or incineration on site

you obtain a movement licence if required.

Full biosecurity safeguards will be in place for the site works including excavation, movement of spoil, and introduction of plants to the site.

The importing of soil and organic material will require special attention and traceability.

All vehicles will require washdown facilities, personnel will require boot and hand tool cleaning areas.

All biosecurity elements will be logged and retained for inspection via a relevant authority.

Biodiversity Enhancements

A series of bird and bat boxes will be erected on the site in order to increase the sites potential to offer nesting and roosting habitat for key species.

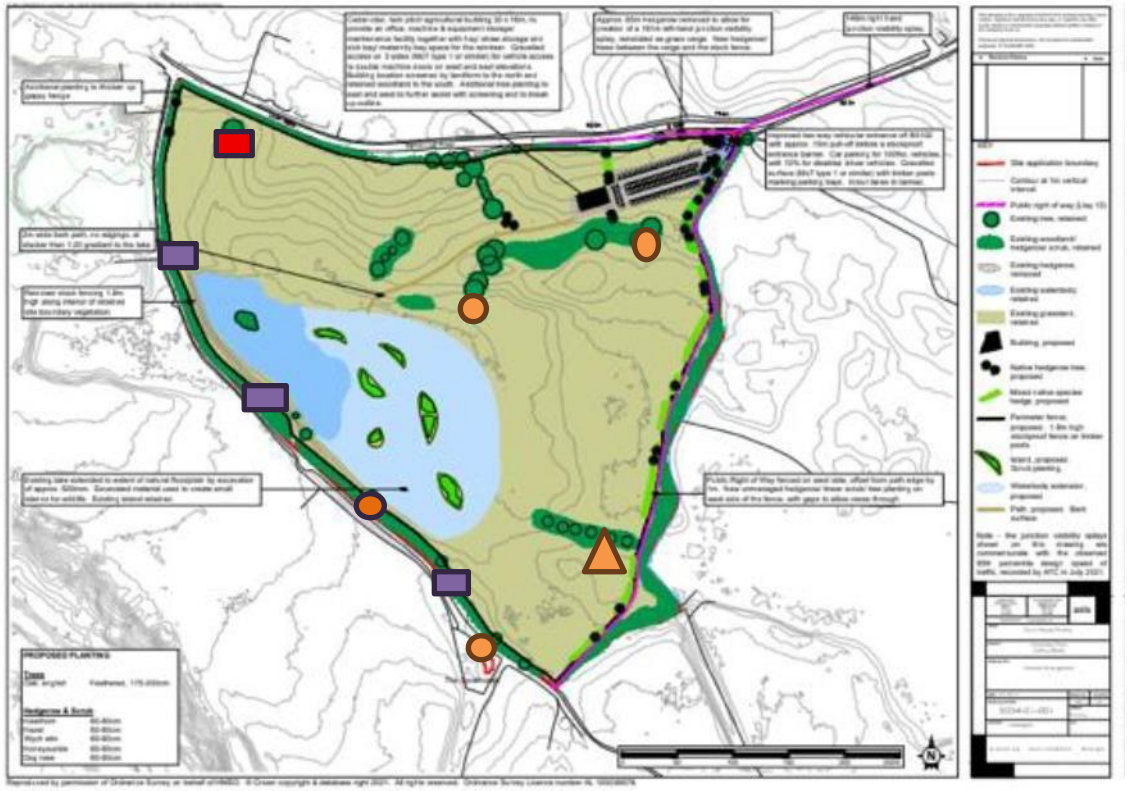


Fig 6 Biodiversity Enhancement

Key

Barn Owl A frame Box

Kestrel Box

Tit Style Box

Woodcrete Bat Box

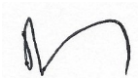
Blast Pond Local Wildlife Site

The above site forms part of the site and will be reprofiled, enlarged and several islands provided.

The site provides breeding habitat for waterbirds and wildfowl. Several species were noted during the spring surveys, Canada Geese, Moorhen, Coot, Mallard, Great Crested Grebe. Barn Swallow were noted foraging over the watercourse. The marshy fringe habitat contained 2 pairs of Lapwing.

It is suggested that both island and shoreline nesting bird refuges are established and enforced during the breeding season.

It is suggested that the marshy grassland is protected by raised board walkways.



Roy S Leigh 5th February 2026