10th February 2025

TEP Ref: 11549.002

Sorrel Bruce is dealing with this matter
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PLANNING I DESIGN I ENVIRONMENT

Pace Architecture Limited
Number 17
Teddington Business Park
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TW11 9BQ

For the Attention of: Neil Campbell at Pace Architecture on behalf of Hydro Aluminium Deeside Ltd.

Dear Neil,

HYDRO ALLUMINIUM RECYCLING CENTRE, WREXHAM: INVASIVE NON-NATIVE SPECEIES (INNS) SURVEY

TEP undertook an INNS survey on 28th January 2026, to inform the recommendations set out within the Construction Environmental Management Plan (CEMP) (TEP ref: 11549.005) and Landscape and Ecological Management Plan (LEMP) (TEP ref: 11549.001) associated with the proposed development at Hydro Aluminium Recycling Centre, Wrexham (hereby referred to as 'the Site').

A full planning application (reference: P/2024/1554) was submitted to Wrexham County Borough Council in October 2024 for the construction of a *'metal recycling sorting facility, soil heap removal, concrete yard extension and landscaping'*. Planning permission was granted in November 2025, subject to planning conditions, including:

- *"Condition 4 (CEMP) to include for invasive species management; species and habitats protection, avoidance, and mitigation measures; and*
- *Condition 6 (LEMP) to include details of short and long-term management prescriptions to both achieve and maintain the condition of the habitat, including contingency prescription for INNS or predators of identified ecological features (e.g. fish in respect of amphibians are detected) and biosecurity measures which consider INNS and specific diseases (e.g. Chytrid) to prevent the introduction of and where present control, removal or for the long-term management of invasive species both during construction and operation".*

INNS are described in Section 14 and Schedule 9 of the Wildlife and Countryside Act (WCA) 1981 (as amended). Section 14 aims to prevent the release into the wild of certain plants and animals which may cause ecological, environmental, or socio-economic harm. The Act makes it an offence to introduce or allow the spread of any species listed on Schedule 9[1].

As part of the Preliminary Ecological Appraisal (PEA), a Phase 1 Habitat Survey was undertaken in April 2023 (TEP ref: 9871.002) which identified no Schedule 9 INNS within the Site. Desktop study records returned for the PEA, identified the presence of the several INNS within 2km of the Site, including Canadian waterweed, Himalayan balsam, Japanese knotweed, montbretia and water fern.

[1] Preventing the release into the wild of certain plants and animals: guidance - GOV.UK (www.gov.uk)

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An updated INNS survey was undertaken on 28th January 2026 by Connor Tucker QCIEEM, FISC Level 3, a competent and appropriately trained individual. The weather was sunny with temperatures reaching a maximum of 7°C, accompanied by a mild breeze.

No Schedule 9 invasive non-native species were recorded within the Site during the survey. However, dog rose (*Rosa canina*) and Franchet's cotoneaster (*Cotoneaster franchetii*) were present. Neither species are listed on Schedule 9 of the WCA and therefore they are not classed as INNS.



Figure 1: Photographs of dog rose (Rosa canina) present within the Site.



Figure 2: Photographs of Franchet's cotoneaster (Cotoneaster franchetii) present within the Site.

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As no INNS were identified within the Site, no specific control or eradication measures are required. Nevertheless, standard biosecurity measures are recommended throughout the construction phase to prevent the introduction or spread of INNS or specific diseases (e.g. Chytrid), these can be found within the CEMP. Guidance for the long-term monitoring and management of INNS is included within the LEMP.

Please do not hesitate to contact me should you have any queries.

Yours sincerely,



Sorrel Bruce, BSc (Hons), AISEP
Senior Landscape Manager
TEP

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