



Template Method Statement to be used within a Great Crested Newt Development Licence Application

This template Method Statement is to be used to form part of your Licence Application for a European Protected Species Development Licence. It will be used to determine the impact of the application on the favourable conservation status of the species concerned (Regulation 55(9) (b) of the Conservation of Habitats and Species Regulations 2017). It must be prepared by a consultant ecologist or other suitably qualified person. You are strongly advised to refer to the **Great Crested Newt Mitigation Guidelines**¹. Please submit your Application and supporting Method Statement electronically to the contact details provided below.

Please note as of the 1st March 2018 the declaration box found at the end of this template must be included on any Method Statements submitted in support of a licence application, and must be signed and dated by the applicant and ecologist. Any application containing a Method Statement without this declaration will be rejected.

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Method Statement Title:	9134.025 EPS Development Licence Method Statement
Method Statement Version Number:	6.0
Method Statement Issue Date:	25/07/2024 / Revision 27/02/2026
Site Address:	Bryn Lane, Wrexham, LL13 9UR

¹ Great Crested Newt Mitigation Guidelines (NEWT1) available from Natural England website

Background and Supporting Information

A Executive Summary.

- A.1 TEP has been commissioned by Net World Sports Ltd. to assist in the implementation of a great crested newt (GCN) licence application associated with the development of land north of Bryn Lane, Wrexham.
- A.2 The site is located on land to the north of Bryn Lane. The approximate central grid reference of the site is SJ 38614 51101. The site is approximately 37.21ha in extent (including access and the roundabout to the south-west). The habitats to be impacted by the proposed works comprise arable fields, semi-improved neutral grassland, hedgerows and a single pond.
- A.3 The proposed works concern Phase 1 of the sites development and include the construction of warehousing facilities for the distribution of sports equipment, for which planning permission is sought. However, Phase 1 of the proposed development site contains a single ponds and suitable amphibian terrestrial habitat that will be impacted. Survey of the onsite pond and ponds outside of the development area have identified a large population of GCN. It is therefore proposed that mitigation will include provision of suitable GCN aquatic and terrestrial habitat, followed by translocation of GCN prior to development.
- A.4 The site forms part of the Strategic Ecology Corridor connecting Francis Lane to Isycoed.
- A.5 This method statement is part of a licence application to be submitted in support of an application to National Resources Wales (NRW) for a licence, under the Conservation of Habitats and Species Regulations 2017 (as amended), to disturb, take and obstruct access for great crested newts relating to development of the site.
- A.6 A licence is required to prevent any accidental killing and injury of GCN during the construction of the proposed development, and to ensure the continued presence of the GCN population within the site. Clearance and translocation of GCN will be undertaken in two phases.
- A.7 On receipt of the licence, prior to any construction/ground works, a new GCN receptor area will be constructed to the north west of the site, containing 10 new ponds, 8 new hibernacula and scrub planting. Following completion of the receptor area, a fenced trapping period will be undertaken and any GCN moved to the receptor site. As part of this trapping effort the pond will also be trapped out, drained and infilled.
- A.8 Following completion of the trapping period construction will commence. As part of the Phase 1 construction, a new GCN pond and landscaped habitat corridors will be created.
- A.9 On completion of the development the amphibian fencing around the perimeter will be removed under the guidance of a suitably licensed ecologist.
- A.10 Future Phases of the development will obtain GCN licences following receipt of full planning permission.

B Introduction

B.1 Background to activity/development

- B.1.1 TEP has been commissioned by Net World Sports Ltd. to assist in the implementation of a great crested newt (GCN) licence application associated with the development of a site North of Bryn Lane, Wrexham, L13 9UR.
- B.1.2 The site located on land north of Bryn Lane, the approximate central grid reference of the site is SJ 38614 51101. The site is approximately 37.21 ha in extent. It comprises a combination of arable fields, semi improved neutral grassland, poor semi-improved neutral grassland, semi-natural broad-leaved woodland, dense/continuous scrub, tall ruderal herbs, standing water, ditches, hedgerows, scattered broad-leaved and coniferous trees, introduced shrub, bare ground with ephemeral/short perennial vegetation, buildings and hardstanding. Of these, virtually all habitats within the site will be impacted by the proposed development.
- B.1.3 The site is bounded to the south by Bryn Land and Wrexham Industrial Estate, to the north by Francis Lane, to the west by both Black Wood Way and Hugmore Lane (with associated residential properties, and to the east by open agricultural fields.
- B.1.4 The surrounding area is rural in nature, with open countryside present to the north, east and south, and urban development to the west associated with Wrexham town centre.
- B.1.5 The site boundary is illustrated in Drawing G.9134.006A and aerial imagery is shown in Drawing G9134.041. The red line boundary shows the extent of the site ownership.
- B.1.6 The proposed works concern the development of the site, including the construction of warehouses, car parking, roads, and landscaping of the site.
- B.1.7 This method statement covers Phase 1 of the sites development but refers to Future Phases as part of the overall site strategy with regards GCN protection and mitigation. Phase 1 of the site development has full planning permission. Future phases of development have outline planning permission and GCN licences will be obtained for Future Phases of development following receipt of full planning permission.
- B.1.8 The Phase 1 development works will result in the loss of 1 Pond with confirmed GCN presence (P1). Future phases will also result in the loss of Pond P2 and the loss of a further pond with indeterminate GCN presence (P5b). GCN presence was determined through eDNA surveys undertaken during 2022. The development will also result in the permanent loss of core and intermediate habitats consisting of arable land, poor semi-improved neutral grassland, hedgerows, swamp, ephemeral pools, and scattered broad-leaved trees.
- B.1.9 The likelihood of GCN being impacted by the unmitigated Phase 1 works is considered high. In order to ensure no accidental killing or injury of GCN during the development, individual GCN will be translocated from the affected areas to a preprepared receptor area outside of the development area, under the same ownership as the development site. To achieve this, vertical amphibian fencing will be installed around the Phase 1 development area, where GCN have been identified. GCN will be captured using pitfall traps installed on the interior of the fenced areas and moved to the prepared receptor site.
- B.1.10 A receptor area will be created to the northwest of the entire development site, and will include 10 new GCN ponds, and 8 new hibernacula within an area formerly unsuitable to support GCN. Translocation of GCN from Phase 1 will be undertaken following completion of the receptor area, and prior to the commencement of development works.
- B.1.11 Future phases of development will also translocate GCN to the same receptor area under a separate licence.

- B.1.12 As part of the Phase 1 development, a replacement GCN pond will be constructed in the south of the development area, within a landscaped corridor running along the south and east boundaries of the development area. Future Phases of the development will also include landscape habitat corridors along the north and east boundaries, and through the centre of the site, and the inclusion of new GCN ponds as illustrated on drawing 22-2630 Bryn Lane Landscape Strategy Landscaping Plan.
- B.1.13 This method statement is part of a licence application to be submitted in support of an application to National Resources Wales (NRW) for a licence, under the Conservation of Habitats and Species Regulations 2017 (as amended), to disturb, take and obstruct access for great crested newts relating to development of the site.
- B.1.14 Consultation with NRW has been sought on this method statement. A table containing NRW feedback (NRW refs: CAS-289100-P7C1 and CAS-299921-J0C3) and the paragraph numbers of the sections addressing this feedback is provided in Annex K.4.

B.2 Full details of proposed works on site that are to be covered by the licence

- B.2.1 Net World Sports Ltd is proposing development of the site, includes the construction of warehouses with associated car parking, road network and landscaping.
- B.2.2 Development of the site will be undertaken in phases. This Method Statement covers Phase 1 of the development but refers to Future Phases as part of the overall strategy for the development.
- B.2.3 Phase 1 of the development, shown in drawing 22-136-SGP-ZZ-ZZ-DR-A-111001 (available at Annex K.2) will be undertaken following receipt of full planning permission from Wrexham County Borough Council. Phase 1 will include the construction of Warehouses, and landscaping of the surrounds.
- B.2.4 Future Phases of the development, shown in drawing 22-136-SGP-ZZ-ZZ-DR-A-111001 Illustrative Landscape Masterplan (as shown at Annex K.2) has obtained outline planning permission for development.
- B.2.5 The development will result in the creation of employment opportunities for the nearby population of Wrexham.
- B.2.6 The proposed works that will be covered by the licence include, site clearance, installation of ponds, habitats construction of buildings, roads, car parking and landscaping of the site.

B.3 Actions requiring licensing

- B.3.1 In order to facilitate the Phase 1 development works, a licence is required to allow the disturbance, capture, and translocation of GCN from the site, followed by destruction of aquatic breeding and terrestrial habitats. These licenced actions will be required as all habitats within the Phase 1 area of Development will be lost as part of the development proposals.

C Survey and site assessment

C.1 Existing information on great crested newts at the survey site.

- C.1.1 The site is situated within the North-east Wales Important Area for Ponds (IAP), which has been identified as an area European importance for its high quality pond habitats.² However, the conservation status of the GCN population in north-east Wales is considered to be unfavourable.³

² Nicolet, P., Weatherby, A., Biggs, J., Williams, P. and Hatton-Ellis, T. (2007) A preliminary assessment of Important Areas for Ponds (IAPs) in Wales. Available at: [IAP report structure](#) [Accessed 14/11/2025]

C.1.2 In January 2022, a search of the available data was undertaken using North Wales Environmental Information Service (COFNOD) records of GCN Monitoring in North Wales. This search revealed 161 historical records of GCN within 2km of the site, including records within the site boundary.

C.1.3 In February 2022, a search of Ordnance Survey mapping was undertaken to identify ponds within a 500m radius of the site. 22 ponds were located within the 500m buffer, 7 of which were present on site.

C.2 Statutory sites notified for the species (SSSIs or SACs) within 10km

C.2.1 There are also a number of statutory designated sites within a 10km radius. Drawing G9134.001 shows the locations of these.

C.3 Objectives of the survey

C.3.1 A GCN presence/absence eDNA survey was undertaken in June 2022 to establish if a GCN population remained present on the site and which ponds had a GCN presence on site.

C.4 Scaled plan/map of survey area

This should be of appropriate scale and orientation with integral or separate location map at 1:50,000 or 1:25,000 scale and aerial photographs.

C.4.1 Drawing G9134.006A shows the location of the site and G9134.041 shows aerial imagery of the site.

C.5 Site/habitat description

C.5.1 The site comprises a combination of arable fields, semi-improved neutral grassland, poor semi-improved grassland, semi-natural broad-leaved woodland, dense/continuous scrub, tall ruderal, standing water, ditches, hedgerows, scattered broad-leaved and coniferous trees, introduced shrub, bare ground with ephemeral/short perennial vegetation, buildings and hardstanding.

C.5.2 All habitats within the site will be impacted by the proposed works, resulting in their loss. GCN have been identified in 2 ponds in the east of the site (P1 and P2) which are surrounded by terrestrial habitats in the form of arable land, semi-improved neutral grassland, species-poor intact hedgerow, species-poor hedgerow and trees, native species-rich hedgerow and trees scattered broad-leaved trees. The hedgerows will provide suitable terrestrial habitat for GCN offering hibernation, refuge, foraging and ranging opportunities.

C.5.3 The site also provides breeding habitat. At the time of the June 2022 survey, 7 ponds were present within the site boundary, one of which was found to be dry (P7).

C.6 Field survey(s).

C.6.1 An eDNA survey of the ponds within and adjacent to the site boundary was undertaken in June 2022, the locations of which are illustrated on TEP G9134.034C. An additional eDNA survey was undertaken of two of the on-site ponds (P1 and P2) and one adjacent pond (P10) on 16th April 2025, with another adjacent pond (P11) surveyed on 9th May 2025. The surveys undertaken at each of the ponds is summarised in Table 1.

³ NRW (2018) Review of the Current Conservation Status (CCS) of the Great Crested Newt in Wales, with specific references to its long-term prospects and within its stronghold in North-East Wales, Report No 259. Available at: <https://naturalresources.wales/media/687859/eng-evidence-report-259-review-of-the-current-conservation-status-ccs-of-the-great-crested-newt-in-wales.pdf> [Accessed 14/11/2025]

The Conservation of Habitats and Species Regulations 2017

C.6.2 Of the 14 ponds selected in 2022, 8 were tested for GCN eDNA (P1, P2, P5b, P6, P8, P9, P10 and P11), 5 were found to be dry (P3, P4a, P4b, P5a and P7) and 1 (P12) was found to no longer exist. The location of these ponds are shown in Drawing G9134.034C. All ponds selected for testing in 2025 were surveyed.

Table 1: Summary of field survey methods

Pond ID	Survey method used at pond	
	HSI Assessment (Year of surveys)	eDNA Survey (Year of surveys)
P1	Yes (2022 and 2025)	Yes (2022 and 2025)
P2	Yes (2022 and 2025)	Yes (2022 and 2025)
P3	Yes (2022)	No, Dry (2022)
P4a	Yes (2022)	No, Dry (2022)
P4b	Yes (2022)	No, Dry (2022)
P5a	Yes (2022)	No, Dry (2022)
P5b	Yes (2022)	Yes (2022)
P6	Yes (2022)	Yes (2022)
P7	Yes (2022)	No, Dry (2022)
P8	Yes (2022)	Yes (2022)
P9	Yes (2022)	Yes (2022)
P10	Yes (2022 and 2025)	Yes (2022 and 2025)
P11	Yes (2022 and 2025)	Yes (2022 and 2025)
P12	No evidence of pond	

C.7 Survey Results.

C.7.1 GCN presence has been identified in 4 ponds through the 2022 and 2025 eDNA surveys. Table 1, below, provides a summary of the results in relation to GCN.

Table 2: GCN eDNA Survey Summary Results

Pond Number	Last Surveyed	GCN Present?
P1	2025	Yes
P2	2025	Yes
P3	Not surveyed – dry (2022)	
P4a	Not surveyed – dry (2022)	
P4b	Not surveyed – dry (2022)	
P5a	Not surveyed – dry (2022)	
P5b	2022	Indeterminate
P6	2022	No
P7	Not surveyed – dry (2022)	
P8	2022	No
P9	2022	Yes
P10	2025	Yes
P11	2025	No
P12	Not surveyed - no evidence of pond (2022)	

C.7.2 In the 2022 surveys, P1 and P2 achieved HSI scores of Excellent and Good for GCN respectively, while P10 and P11 both achieved Poor. In the 2025 surveys, P1 and P2 achieved Good and Below Average respectively, and P10 and P11 both achieved Average. The reduction in suitability in P1 and P2 is likely due to scrub encroachment which has increased shading and reduced water levels. The slight increase in suitability in P10 and P11 is partly due to higher ratings being given to water quality and terrestrial habitat in the most recent surveys. The 2022 and 2025 HSI results are provided in Annex K.1 and K.3 respectively.

C.8 Interpretation/evaluation of survey results

C.8.1 The eDNA surveys revealed that the local GCN population is utilising two of the ponds on site (P1, P2) and two ponds located to the north and east of the site (P9 and P10 respectively).

- C.8.2 These ponds are situated within the North-east Wales IAP, which has been identified as an area of European importance for its high-quality pond habitats.⁴ The conservation status of the GCN population in north-east Wales is considered to be unfavourable.⁵
- C.8.3 The current GCN population size on site is unknown. Therefore, the Current Conservation Status of the GCN population on site has not been assessed.⁶ Moderate threats to the prospects of the on-site ponds have been identified due to lack of management and scrub encroachment. The reduction in the suitability of two on-site ponds (P1 and P2) between 2022 and 2025 due to scrub encroachment is consistent with historic findings that hydrosere succession is impacting GCN populations in the Wrexham Industrial Estate area.⁷ Therefore, the condition of these ponds is considered likely to decline over time. The aims of the mitigation should be to achieve and maintain Favourable Conservation Status for GCN within the site.
- C.8.4 One of the on-site ponds (P1) with GCN presence is located within Phase 1 of the development and will be lost as part of the development.
- C.8.5 Pond P2 is located within the development footprint of Future Phases of development as will be lost during future development.
- C.8.6 Ponds P9 and P10, located outside of the development site, to the north, will be unaffected by Phase 1 of the development, however intermediate terrestrial habitat will be affected by the future phases of the development.
- C.8.7 Ponds P5b returned an indeterminate result for GCN eDNA, therefore the presence of GCN in this pond cannot be ruled out. Indeterminate results can be caused by a variety of factors, including the water chemistry or the presence of high levels of sediment in samples, both of which can interfere with the DNA extraction process.
- C.8.8 Additional sampling of this pond could be undertaken to determine the presence/absence of GCN. However, it has already been established that GCN are present in on-site and off-site ponds and Natural Resources Wales have agreed to the assumption that a large GCN population is present within the site, therefore additional surveys are not required.
- C.8.9 GCN surveys are valid for at least 2 survey seasons and potentially 4 years or more depending on the specific use of the data, local conditions and the potential impact predicted on GCN. As update surveys of two on-site (P1 and P2) and two off-site ponds (P10, P11) took place in 2025 and confirmed the continued presence of GCN on site, and mitigation will be based on the assumption that a large GCN population is present within the site, it is considered that the current survey data is sufficient.

D Impact assessment

- D.0.1 Due to the confirmed presence of GCN within the proposed development area, it is highly likely that GCN will be present on site at the time of construction works and be injured or killed. Under the relevant legislation, it is an offence to knowingly kill, harm or injure GCN. In the absence of

⁴ Nicolet, P., Weatherby, A., Biggs, J., Williams, P. and Hatton-Ellis, T. (2007) A preliminary assessment of Important Areas for Ponds (IAPs) in Wales. Available at: [IAP report structure](#) [Accessed 14/11/2025]

⁵ NRW (2018) Review of the Current Conservation Status (CCS) of the Great Crested Newt in Wales, with specific references to its long-term prospects and within its stronghold in North-East Wales, Report No 259. Available at: <https://naturalresources.wales/media/687859/eng-evidence-report-259-review-of-the-current-conservation-status-ccs-of-the-great-crested-newt-in-wales.pdf> [Accessed 14/11/2025]

⁶ NRW (2017) Spatial Action Plan for Great Crested Newts in Wrexham, Report No 77. Available at: <https://naturalresources.wales/media/684989/report-077-spatial-action-plan-gcn-wrexham.pdf> [Accessed 14/11/2025]

⁷ NRW (2018) Review of the Current Conservation Status (CCS) of the Great Crested Newt in Wales, with specific references to its long-term prospects and within its stronghold in North-East Wales, Report No 259. Available at: [Contents](#) [Accessed 14/11/2025]

mitigation works this could have a high impact as set out in English Nature Mitigation Guidelines 2001.

D.1 Short-term impacts: disturbance

Phase 1

- D.1.1 During Phase 1 of Development, GCN populations present in Pond 2 will be restricted from dispersing to the south due to habitat destruction. Although the ponds are some distance from each other (429m) there is potential for individual newts to range move between the two ponds.

Future Phases

- D.1.2 During future phases of the development GCN present within P9, P10 and offsite habitats will be restricted from dispersing through the site.

D.2 Long-term impacts: site modification

- D.2.1 The development of Phase 1 of the site will result in the permanent loss of a GCN breeding pond and terrestrial habitats including hedgerows that provide ranging habitats for GCN within and across the site. The result of the development on the GCN population in the absence of mitigation is considered to be negative.

D.3 Long-term impacts: site loss

- D.3.1 As part of the sites development there will be permanent loss of breeding and terrestrial GCN habitat. Pond 1,2 and 3 will be replaced within the corridor.

Phase 1

- D.3.2 The Phase 1 development will result in the permanent loss of Pond P1, 1.156 ha area of core habitat and 9.45ha area of intermediate terrestrial habitat. The core terrestrial habitat is low quality arable farmland. The intermediate terrestrial habitat also consists of mainly arable farmland and hedgerows. The hedgerows provide high quality habitat for GCN.

Future Phases

- D.3.3 Future development phases will result in the permanent loss of Pond P2, 1.196ha area of core habitat and 8.38 ha area of intermediate terrestrial habitat. The core terrestrial habitat is low quality semi-improved grassland and species poor hedgerows and trees. The intermediate terrestrial habitat also consists of low quality semi-improved, arable farmland, hedgerows and scattered trees. The hedgerows provide high quality habitat for GCN.

D.4 Long-term impacts: fragmentation and isolation

- D.4.1 Completion of all phases of development will result in fragmentation of GCN habitats, through the loss of ponds and terrestrial habitats. The loss of the onsite ponds may remove stepping stone habitat for GCN moving through the local area, including populations offsite, such as identified at Ponds P9 and P10. Loss of terrestrial habitats as part of the development also removes dispersal routes, particularly through the loss of hedgerows.

D.5 Post-development interference impacts

- D.5.1 Following completion of development there is potential for interference impacts to the GCN population as a result of the sites use.

- D.5.2 Around roads and parking area, gully pots may result in GCN becoming trapped.

- D.5.3 Post development, human interference is likely due to the increased use of the site, from pedestrians and vehicles which GCN may encounter as a result of the development.

D.6 Predicted scale of impact

- D.6.1 The overall scale of the impact of development in the absence of mitigation is considered to be high.

Delivery Information - Mitigation, compensation and monitoring

E Works to be undertaken

E.1 Great Crested Newt capture and exclusion (if applicable).

Phase 1

- E.1.1 Drawing G9134.038 shows the capture and exclusion proposals for Phase 1 of the development. Vertical amphibian fencing will be installed around the perimeter of the Phase 1 development area and this will remain in place for the duration of the works. The fencing will be installed on the interior side of the hedgerows, which will remain in place through the development works. The vertical fence will possess a top-curl and will be buried in the ground. The anticipated specification for the vertical fence is provided in TEP.ECO.001.
- E.1.2 Drift fencing will be installed as shown within the perimeter fence, using the same specification. Drift fencing will be installed on both sides of the hedgerows that cross the Phase 1 development area. A ring fence will also be installed encircling Pond P1.
- E.1.3 All fence installation works will be supervised by a suitable experienced ecologist holding a NRW great crested newt licence. The area where the fencing will be installed will be subject to a hand search prior to installation. In the event newts are uncovered during fencing operations they will be moved to the receptor area, located within the centre of the site.
- E.1.4 When the section of hedgerow is removed, the rootballs will be hand searched for GCN and any found will be moved to the receptor area.
- E.1.5 Pitfall traps will be installed at 10m intervals around the interior of the entire perimeter fence and both sides of all drift fencing, ensuring traps are also located in the corners of all compartments. Pitfall traps will also be installed at 5m intervals on both sides of the ring fence around Pond P1.
- E.1.6 Upon commencement of the trapping period (April to July 2026) traps will be inspected daily, before 9am by an experienced ecologist. A record of all amphibians trapped will be made, including the species, date, time, and compartment number. Following trapping, all amphibians will be moved to the receptor area.
- E.1.7 Due to the assumed presence of a large population of GCN, trapping will be undertaken for a period of 60 days of suitable weather, excluding cold and periods of dry, hot weather. If a period of 10days of suitable weather passes without GCN capture, the ecologist can use their judgement as to whether trapping should, continue. Due to the compartmentalisation of the exclusion areas, trapping can continue in specific compartments when necessary.
- E.1.8 The exclusion and drift fencing will be routinely inspected by the supervising ecologist to ensure that the fences remain in a viable condition to prevent recolonisation of the site by amphibians. Any damage will be repaired the same day during the summer months (March to October) and within a 24 hour period during the winter months (November to February). A documented record of inspections and repairs shall be kept.
- E.1.9 Pond P1 will be drained down during the autumn of 2026. Water will be pumped out using a fine mesh net covering the hose. Bottle Trapping/Netting will be used to trap newts out of the pond prior to draining for a period of 30days. Following draining down of the pond, a destructive search will be conducted.

- E.1.10 Following completion of trapping, each compartment will be released for development. Where trapping has been completed in neighbouring compartments, drift fencing will be removed.
- E.1.11 Perimeter amphibian exclusion fencing will remain in place until completion of the Phase 1 development. Fence inspections will continue throughout the development period by a site representative, and repairs will be undertaken the same day as damage is identified. Periodic inspection by a qualified ecologist will be undertaken to ensure compliance with the licence.
- E.1.12 On completion of the development the perimeter fencing will be removed under supervision of a suitably qualified ecologist.

Future Phases

- E.1.13 Following receipt of full planning permission, future phases of the development will be the subject of separate licence applications detailing the specific trapping and exclusion methods.

E.2 Great Crested Newt habitat

E.2.1 Receptor site modification, enhancement or creation.

Phase 1 Receptor Site

- E.2.1.1 Prior to the start of the exclusion and trapping period, a receptor area will be constructed to the northwest of the site. Construction will be undertaken from November 2025, and will be ready to accept translocated GCN in spring 2026. The location and layout of the receptor site is shown in Drawing G9134.040 and as Parcel 4 in Drawing G9134.042A.
- E.2.1.2 The receptor site consists of an area of arable farmland with no ponds within the site. The site is considered to have low suitability to support GCN in its current state. Within the translocation site the following habitats will be created:
- 10 new GCN Ponds.
 - 8 GCN hibernacula.
 - Areas of scrub planting.
- E.2.1.3 The new translocation area will create 2.8ha area of new GCN habitat.
- E.2.1.4 Additional mitigation will be created to the south-east of the site on 9.41ha of off-site land (Parcels 2 and 5 on drawing G9134.042A). Within the mitigation site the following habitats will be created:
- 11 new GCN ponds.
 - 10 GCN hibernacula.
 - Areas of scrub planting.
- E.2.1.5 Mitigation areas measuring 5.77ha will be also be created on-site (the 'Green corridor' illustrated on drawing G9134.040).

Phase 1 Development Site Habitats

- E.2.1.6 As part of the landscaping element of the Phase 1 development, a new GCN pond will be created in the south of the development area. A landscaping corridor will be included along the southern and eastern boundaries of the Phase 1 development area, including hedgerows, scrub and wildflower grassland.

Future Phases Site Habitats

- E.2.1.7 Future phases will be the subject of separate GCN licence method statements following the receipt of full planning permission. In summary, landscaping corridors will be created along the east and northwest boundaries of the site as shown in drawing G9134.040 further landscaping and SUDs

corridor will be included in the centre of the Future Site, retaining two existing ponds and a new hibernaculum. A replacement GCN pond will be constructed following the expected loss of Pond P2 in the northeast of the site. A further new GCN pond will be constructed in the northwest of the site, just south of the new translocation area.

Ponds and hibernacula

E.2.1.8 The ponds and hibernacula that are constructed as part of Phase 1 and Future Phases of the development will follow designs shown in drawings TEPAQU.004 & TEPMIS.10. All GCN habitat creation will be supervised by a suitably qualified ecologist.

E.2.2 Temporary loss of breeding sites, resting places

E.2.2.1 All GCN habitats within the Phase 1 development area will be permanently lost.

E.2.3 Destruction of existing breeding sites, resting places

Phase 1

E.2.3.1 Pond P1 will be permanently lost as part of the development. Following completion of the trapping and translocation period (April to July 2026), Pond P1 will be drained down and destroyed. Fencing locations for the trapping and translocation period, including ring fencing the pond are shown in drawing G9134.038.

E.2.3.2 The pond will be drained down using a pump with mesh.

E.2.3.3 Following completion of the trapping and exclusion period, all hedgerows to be removed will be cut to ground level and searched by hand by an ecologist. All amphibians will be moved to the translocation receptor area. Following the hand search the roots of the hedgerows will be carefully removed by machine under the supervision of an ecologist. Each root ball will be inspected by the ecologist and any amphibians identified will be moved to the receptor area.

Future Phases

E.2.3.4 All habitat destruction in Future Phases of the development will be the subject of a specific GCN Method Statement detailing methods.

E.2.4 Scaled maps/plans

E.2.4.1 All plans referred to throughout this method statement are listed as follows:

- G9134.006A Site Location Plan (Version A, April 2023);
- G9134.041 Aerial Imagery of Site (Original issue, July 2024);
- G9134.007B Phase 1 Habitat Survey Plan (Version B, April 2023);
- G9134.001A Statutory Ecological Designations within 10km Radius (Version A, April 2024);
- G9134.034C GCN Survey Results (Version C, February 2026)
- G9134.038 Fencing Plan Capture & Exclusion Proposals (Original issue, June 2024);
- G9134.040 GCN Mitigation and Receptor site (Original issue, July 2024)
- G9134.042A GCN Off-Site Mitigation Phasing Plan (Version A, July 2025)
- 22-2630 Bryn Lane Landscape Strategy Landscaping Plan (Version 5, December 2023)
- TEP.AQU.004 Pond Design (Original issue, August 2017)
- TEP.MIS.010 Amphibian Hibernacula Design (Original issue, April 2003)
- D9134.002A Temporary Amphibian Fencing (Version A, September 2025)
- TEP.MIS.018 Amphibian Sub-surface Tunnel (Version A, January 2023)

- 22-136-SGP-ZZ-ZZ-DR-A-111001 Illustrated Landscape Masterplan (Version M, February 2023)

E.2.4.2 These are presented in Annex K.2.

E.2.4.3A GIS data layer is included within this licence application showing locations of existing and proposed habitats. **This will be included with formal licence application**

E.3 Mechanisms for ensuring delivery of mitigation and compensation measures

E.3.1 Measures to ensure compliance with this method statement.

E.3.1.1 An Audit will undertaken as described below.

Ecological Compliance Audit Tier	Audit Type	Key Performance Indicators Attached	If no proposed date for submission to NRW
1	Not required due to small scale of work	Not applicable	Not applicable
2	Internal	☐ Yes ☒ No	Following completion (<i>Internal audit - TEP</i>)
3	External	Yes	Large Scale works

E.3.2 Ensure that sufficient land has been acquired for compensation purposes

E.3.2.1 The loss of habitat associated with the development and the gains in habitat from the creation of mitigation areas on-site and off-site are shown in the table below:

Total site area (including roundabout and access)	Total area of land lost	Total area of land acquired for compensation purposes		
		On-site	Off-site	Total
37.21ha	36.35ha	5.77ha	12.21ha	17.98ha

E.3.2.2 The total area of land acquired for compensation purposes is 17.98ha, which equals 50% of the land lost to development. The on-site land set aside for compensation is illustrated as the 'Green corridor' on drawing G9134.040. The off-site land acquired for compensation is illustrated as Parcels 2, 4 and 5 on drawing G9134.042A. Additionally, the layout of Parcel 4 is provided on drawing G9134.040.

E.3.2.3 The translocation receptor area (Parcel 4) has been purchased by the developer.

E.3.3 Ensure that designs of subsequent development are newt friendly

E.3.3.1 Gulley Pots will not be installed in location that impact on GCN, bypass kerbs and amphibian ladders will be installed where required in the road scheme design.

E.3.3.2 Amphibian tunnel will be constructed under roads where required. 2m wide, 0.8m wide, supported by fencing directing animals.

E.3.3.3 The use of salt on roads and footpaths in cold weather will be prohibited and alternatives will be used subject to the approval of NRW (through the licensing process).

E.3.4 Provide sufficient resources

E.3.4.1 Monitoring will be carried out on all ponds within the site boundary, new and existing, and newly created. Offsite ponds created within the mitigation area will also be monitored during and post construction.

E.4 Mitigation contingencies

E.4.1 If the vertical perimeter amphibian fence suffers major vandalism, or damage during construction works and is in need of major repairs then TEP shall be contacted immediately, and the fence shall be repaired the same day during the summer months (March to October) and within a 24 hour period during the winter months (November to February).

E.4.2 Machines will be stored away from the pond areas. Any pollution incidents which occur on site during construction should also be reported to TEP immediately and steps will be taken to ensure clean-up operations are instigated where required.

E.5 Biosecurity risk assessment

E.5.1 Bio-security measures will be implemented throughout the construction period. These will include:

- Amphibian species to be transported in separate compartments;
- Surveyors to disinfect footwear and equipment on entering and leaving the site.
- Machinery will be cleaned and disinfected on entering and leaving the site.

E.5.2 A full biosecurity risk assessment will be prepared.

F Post-development site safeguard

F.1 Habitat/site management and maintenance

F.1.1 The site will be managed by Net World Sports and their assigned qualified licensed consultants. Net World Sports are committed to managing ecological areas within Utopia City, working with high quality contractors who understand how to maintain important habitats. These contractors will be fully understanding of the correct management and surveillance prescriptions. Secured under 106 commitment.

F.1.2 However, in the event that Net World Sports decides in the future that it no longer wishes to manage these contractors it will undertake a procurement of a suitable body to take on management responsibilities. This will be a thorough process, with Net World Sport being supported by their professional ecology and landscape advisors as necessary. This suitable body could, for example, be a wildlife charity and – in all circumstances – will be appropriately qualified and experienced to undertake the role.

F.1.3 In any scenario, management of ecology areas will likely be funded via an estate management charge paid by occupiers within Utopia City. This ensures that an income stream is available for any party responsible for managing ecology areas within Utopia City.

F.2 Population monitoring

F.2.1 All Ponds, within the Phase 1 development site, Future Phases and, Receptor area and within 250m of the site boundary will be surveyed annually to determine presence and population sizes of GCN. As new ponds are created, these will be included in the surveys. Surveys will be undertaken by licenced ecologists through out the development period and for a minimum of 25 years post completion of all parts of the site. Surveys will be undertaken using torchlit surveys

The Conservation of Habitats and Species Regulations 2017

and additional methods where required, eDNA will be used to support these surveys if the season allows. These will be discussed with NRW.

F.2.2 Net World Sports will report back the monitoring results as part of the Wales GCN Monitoring Scheme.

F.3 Post-development mitigation contingencies

F.3.1 If monitoring results are unfavourable, the Landscape and Ecological Management Plan (9134.05.001) will be revisited to identify areas where further management or habitat creation could encourage greater use of the site by GCN. The LEMP should be reviewed yearly making sure that the sites are managed correctly against prescriptions and timescales identified in the plan.

F.3.2 Should a population fish establish then methods will be used to remove fish from site.

F.3.3 Pollution incidents arise these will be dealt with in an appropriate manner consulting with the necessary agencies.

F.3.4 If invasive species colonise, then the appropriate methods will be implemented to remove without the use of chemicals.

F.4 Mechanism for ensuring delivery of post-development works

F.4.1 The requirement for the management plan is secured and enforceable via a combination Planning Condition and s106 Agreement.

G Timetable of works

Date	Action
October 2025	Receipt of Planning Permission
November 2025 to February 2026	Construction of Receptor Site, including pond creation, hibernacula and scrub planting. Francis Lane
March/ April 2026	Installation of amphibian fencing and pitfall traps at Phase 1 Site.
April 2026 to July 2026	GCN traps opened and trapping period undertaken for 60 consecutive nights of suitable weather conditions.
July/ August 2026	Removal of drift fencing and destructive searches of hedgerows. Ring fencing remains in place around Pond P1.
September 2026	Pond P1 drained down and hand searched before infilling.
October 2026 - onwards	Phase 1 construction activities, including landscaping and construction of replacement GCN pond.
TBC	Removal of GCN perimeter fencing.

H Land Ownership – Mitigation Site/Compensation Site

H.1 Mitigation Site/Compensation Site Ownership

The Conservation of Habitats and Species Regulations 2017

H.1.1 All land to be used for mitigation purposes, including the translocation receptor site is under the ownership of the developer.

H.2 Mitigation Site/Compensation Ownership post construction

H.2.1 All land used for GCN mitigation will remain under the ownership and management of the developer Networkworld post completion. An appropriate ecological consultants with GCN licences will be employed to support the developer owner.

I Declaration

I declare that should a licence be granted, the work as proposed in this Method Statement will be strictly adhered to. I understand that any deviation from the works as proposed in this Method Statement without agreement from NRW would result in a breach of the licence.

NB. Applicants should note that it is an offence under regulation 59 of the Conservation of Habitats and Species Regulations 2017 to knowingly or recklessly provide false information in order to obtain a licence.

Signature of the Applicant		Date	25/07/24
<i>For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.</i>			X
Full name in BLOCK LETTERS	JOHN HUGHES		
Signature of the Ecologist		Date	25/7/24
<i>For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.</i>			X
Full name in BLOCK LETTERS	LEE GREENHOUGH		

J References

Nicolet, P., Weatherby, A., Biggs, J., Williams, P. and Hatton-Ellis, T. (2007) A preliminary assessment of Important Areas for Ponds (IAPs) in Wales. Available at: [IAP report structure](#) [Accessed 14/11/2025]

NRW (2018) Review of the Current Conservation Status (CCS) of the Great Crested Newt in Wales, with specific references to its long-term prospects and within its stronghold in North-East Wales, Report No 259. Available at: <https://naturalresources.wales/media/687859/eng-evidence-report-259-review-of-the-current-conservation-status-ccs-of-the-great-crested-newt-in-wales.pdf> [Accessed 14/11/2025]

NRW (2017) Spatial Action Plan for Great Crested Newts in Wrexham, Report No 77. Available at: <https://naturalresources.wales/media/684989/report-077-spatial-action-plan-gcn-wrexham.pdf> [Accessed 14/11/2025]

K Annexes

- K.1** Pre-existing survey report (TEP Ref: 9134.007) from surveys in 2022
- K.2** Scaled maps/plans, including Illustrative Landscape Masterplan 22-136-SGP-ZZ-ZZ-DR-A-111001
- K.3** GCN HSI results for P1, P2, P10 and P11 from further surveys in 2025
- K.4** Table displaying NRW feedback and relevant amended paragraphs within Method Statement

Annex K.1 - Pre-existing survey report (TEP Ref: 9134.007) from surveys in 2022



THE
ENVIRONMENT
PARTNERSHIP



LAND NORTH OF BRYN LANE WREXHAM GREAT CRESTED NEWT TECHNICAL APPENDIX

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Document Title	Great Crested Newt Technical Appendix
Prepared for	Net World Sports
Prepared by	TEP - Warrington
Document Ref	9134.007

Author	Poppy Parker
Date	April 2023
Checked	Lee Greenhough
Approved	Lee Greenhough

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DRAWINGS
G9134.034 - Great Crested Newt Survey Results

Executive Summary

1. TEP was commissioned by Net World Sports in October 2021 to undertake eDNA surveys and Habitat Suitability Index (HSI) assessments at Land North of Bryn Lane, Wrexham (hereby referred to as "the site"). Ecological surveys are required to support an Environmental Statement that will inform proposals for a commercial development.
2. The proposed development is commercial in nature and encompasses:

Detailed Component:

- *Demolition of existing buildings, site clearance and preparation works, including removal of vegetation and reprofiling of topsoil, where necessary;*
- *Construction of a new warehouse unit, providing 33,595 sqm Gross External Area (GEA) for B1c (light industry appropriate in a residential area), B2 (general industrial) and B8 (storage & distribution) uses (Unit 2);*
- *Construction of 8 new smaller units (Units 3-7; 14-16), providing a total of 29,659 sqm GEA for B1c (light industry appropriate in a residential area), B2 (general industrial) and B8 (storage & distribution) uses;*

Outline Component:

- *Construction of up to 72,635 sqm GEA for employment uses (B1c (light industry appropriate in a residential area), B2 (general industrial) and B8 (storage & distribution) uses), ancillary retail/drive thru facilities and potential for a hotel and petrol filling station (A1, A3, C1 or sui generis). The overall quantum of A1, A3, C1 or sui generis use would not exceed 16,150 sqm GEA;*
- *The proposed buildings will be up to 28.5m in height above ground level;*

Site Wide

- *Access and parking provision, including new access junctions, internal roads, service yards and car and HGV parking. Two new junctions are proposed (in detail) providing vehicular access, as well as cycle and pedestrian access, from Bryn Lane/Industrial Estate Road with an additional access road for a substation. Car parking spaces, HGV trailer spaces and HGV lorry spaces are proposed across the application site;*
 - *Retention and enhancement of some existing on-site green spaces and provision of landscaping around the application site; and*
 - *Implementation of drainage/attenuation measures.*
3. eDNA surveys, to establish the presence or absence of great crested newts (GCN), and HSI assessments, to determine the suitability of waterbodies to support GCN, have been undertaken on 14 waterbodies within 500m of the site. Surveys were undertaken within the appropriate season and under the recommended conditions, so no survey limitations were encountered.

4. The surveys are required to establish whether GCN are present on or within influencing distance of the site.
5. Several historic records of GCN were found within 2 km of the site.
6. A HSI assessment was undertaken on all accessible ponds. The ponds ranged from having Poor to Excellent suitability to support GCN.
7. eDNA sampling was also undertaken on all ponds holding water, to assess whether GCN are present within any of the ponds. GCN presence was detected in two of the seven on-site ponds (ponds P1 and P2) and one of the seven off-site ponds (pond P9).
8. A licence from Natural Resources Wales will be required to facilitate any future development proposals. Following discussions with Natural Resources Wales it has been agreed that the use of eDNA and historic data will be acceptable to support the planning application.

2.0 Introduction

2.1 TEP was commissioned by Net World Sports in October 2021 to undertake eDNA and HSI surveys of waterbodies within 500 m of land known as the land north of Bryn Lane in Wrexham, North Wales (hereby referred to as "the site"). Ecological surveys are required to support an Environmental Statement that will inform proposals for a commercial development.

2.2 The proposed development is commercial in nature and encompasses:

Detailed Component:

- *Demolition of existing buildings, site clearance and preparation works, including removal of vegetation and reprofiling of topsoil, where necessary;*
- *Construction of a new warehouse unit, providing 33,595 sqm Gross External Area (GEA) for B1c (light industry appropriate in a residential area), B2 (general industrial) and B8 (storage & distribution) uses (Unit 2);*
- *Construction of 8 new smaller units (Units 3-7; 14-16), providing a total of 29,659 sqm GEA for B1c (light industry appropriate in a residential area), B2 (general industrial) and B8 (storage & distribution) uses;*

Outline Component:

- *Construction of up to 72,635 sqm GEA for employment uses (B1c (light industry appropriate in a residential area), B2 (general industrial) and B8 (storage & distribution) uses), ancillary retail/drive thru facilities and potential for a hotel and petrol filling station (A1, A3, C1 or sui generis). The overall quantum of A1, A3, C1 or sui generis use would not exceed 16,150 sqm GEA;*
- *The proposed buildings will be up to 28.5m in height above ground level;*

Site Wide

- *Access and parking provision, including new access junctions, internal roads, service yards and car and HGV parking. Two new junctions are proposed (in detail) providing vehicular access, as well as cycle and pedestrian access, from Bryn Lane/Industrial Estate Road with an additional access road for a substation. Car parking spaces, HGV trailer spaces and HGV lorry spaces are proposed across the application site;*
- *Retention and enhancement of some existing on-site green spaces and provision of landscaping around the application site; and*
- *Implementation of drainage/attenuation measures.*

Site Description

2.3 The site (central grid reference SJ 38614 51101) is approximately 37.21 ha in size and is located to the east of Wrexham in North Wales. There are seven ponds within the site boundary and seventeen ponds within 500m of the site that are not separated by any major barriers such as main roads and rivers etc.

- 2.4 A review of mapping and satellite imagery identified one A-road, the A534 Wrexham Road, acting as a barrier to amphibian dispersal. This road is located approximately 900m north of the site.
- 2.5 The site boundary is illustrated in Figure 1.

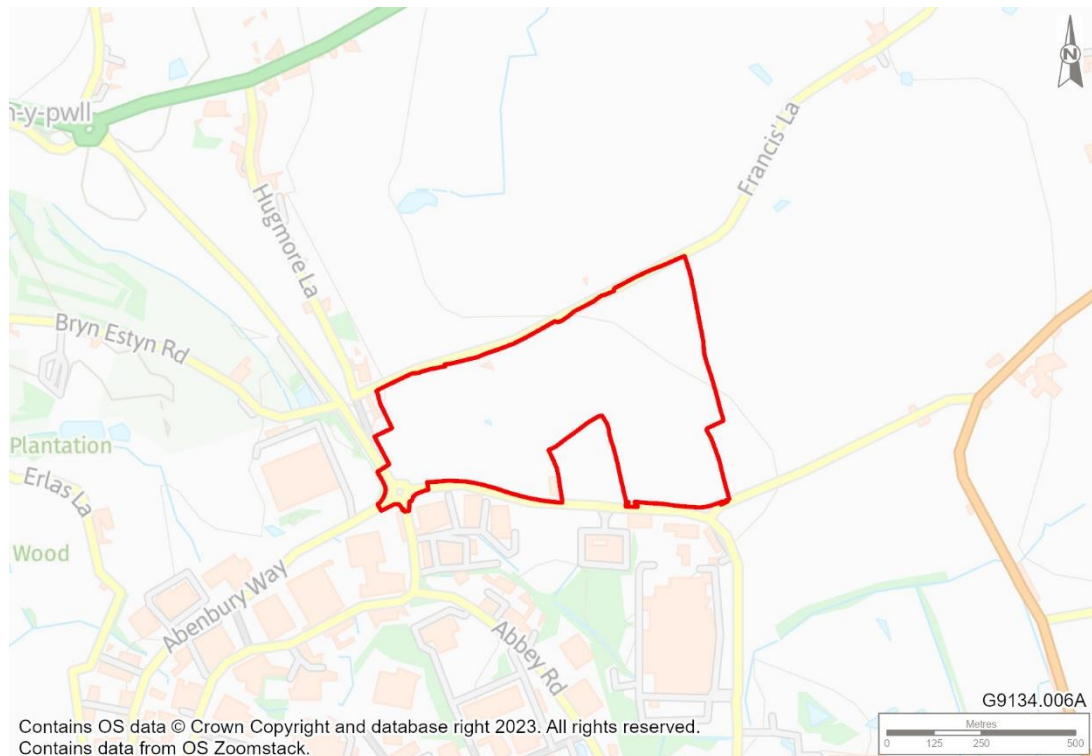


Figure 1: Site location within the context of the wider landscape

- 2.6 Environmental DNA (eDNA) sampling has been used to establish whether or not great crested newts *Triturus cristatus* are breeding within the site or in ponds within ranging distance of the site. Where GCN are present survey effort is designed to allow population size class to be assessed. This information is required to inform development proposals including the design of any mitigation and consideration of any relevant legislation and policies. Although surveys target GCN, any incidental records of other amphibian species, if encountered, will also be recorded and the results presented in this report.
- 2.7 All seven ponds within the site have been included in the field survey scope. Of these, all ponds were subject to HSI assessments, however four ponds (P3, P4a, P4b and P5a) were found to be dry and so were not subject to eDNA survey. Access was granted to all seven ponds on site.
- 2.8 A further seven ponds were identified within 500m of the site that are not separated by barriers to amphibian movement. Of these, one pond (P12) was found to no longer exist and could not be subject to any surveys. The remaining six ponds were all subject to HSI surveys, but one pond (P7) was found to be dry and so was not subject to eDNA survey. Access to survey these seven ponds was granted from third parties.

3.0 Method

Ecology Desk Study

- 3.1 Data requests were submitted to North Wales Environmental Information Service (COFNOD) in January 2022 to ascertain if any records of GCN are present within influencing distance of the site. The search zone included the site and within 2 km of the site boundaries.

Habitat Suitability Index (HSI) Assessments

- 3.2 A HSI assessment of seven ponds was undertaken by TEP Principal Ecologist Alun Evans on 3rd December 2021.
- 3.3 HSI is a standard measure of calculating the suitability of a pond to support breeding GCN, based on an assessment of ten characteristics (indices), including size, shading, depth and vegetation profile. The assessment generates a number between 0 and 1 for each of the indices which are combined to provide an overall assessment of a pond's suitability to support GCN on a categorical scale (Table 1). The assessment has not been designed for or tested on other waterbodies such as ditches.

Table 1: Pond habitat suitability index scoring

HSI Score	Suitability	Predicted GCN Occupancy of Ponds in each Category
< 0.5	Poor	3%
0.5 to 0.59	Below average	20%
0.6 to 0.69	Average	55%
0.7 to 0.79	Good	79%
> 0.8	Excellent	93%

eDNA

- 3.4 Environmental DNA (eDNA) sampling was undertaken at eight ponds (P1, P2, P5b, P6, P8, P9, P10 and P11) by licenced ecologists Angela McEwan (Licence No: 2015-16877-CLS-CLS) and Lee Greenhough (Licence No: 2015-18144-CLS-CLS).
- 3.5 Ponds P3, P4a, P4b, P5a and P7 were found to be dry and therefore were not suitable for this survey method. Furthermore, no evidence of pond P12 was found at the time of survey.

3.6 Sample collection was undertaken by TEP. Sample kits and analysis was provided by ADAS. Both organisations followed the relevant sections of the method set out in the DEFRA funded study endorsed by Natural England and Natural Resources Wales¹. In summary the sampling protocol is as follows:

- 20 samples were taken from around the entire perimeter of the waterbody.
- The surveyor stayed out of the water while taking the samples (extension poles were used in situations where open/sufficiently deep water was at a distance from the dry banks.
- Survey locations were distributed around the pond perimeter but micro-siting was used to select locations most likely to be used by GCN.
- At each sample location the water column was stirred prior to taking the sample but care was taken to avoid disturbing the sediment on the base of the pond.
- Once all 20 samples were taken, 15ml of the total sample were pipetted into each of the 6 sampling tubes, whilst ensuring that the water in the sample bag was mixed before taking each 15ml sample and that only one sample tube was opened at any one time.
- At all times the surveyor ensured that the risk of contaminating the sampling equipment was minimised by avoiding the placement of the ladle or pipette on the ground or on any otherwise potentially contaminated surfaces and by changing gloves between the initial sampling stage and the pipetting stages of the method.

Chain of custody

3.7 On receipt from ADAS the sampling kits were registered on a central database using the unique bar codes. Immediately prior to survey, sampling kits were issued to surveyors with individual Sample Forms using the unique bar code as identification. The site name and date of issue was also recorded on this form (and on the central database). Once in the field and at the ponds, the surveyor confirmed that the appropriate field survey sheet was being completed by checking the bar code on the box and double checking the corresponding bar codes on the sample tubes. The surveyor then filled in the date of survey and the pond ID number (as well as other information relating to survey conditions) on the Sample Form.

3.8 On returning to the office the Sample Forms were signed to confirm for each sample who received the samples and checked them into the fridge and the temperature of the fridge. The pond IDs on each form were checked against a site map confirming which ponds had been sampled and this map was stored with the Sample Forms. All this information was also recorded on the central database. The sample preserving tubes were stored in a fridge until the morning of collection by the courier. The Sample Forms and the central database were updated to confirm the date of collection by the courier.

¹: Biggs et al 2014. Analytical and methodological development for improved surveillance of the Great Crested Newt. Defra Project WC1067. Freshwater Habitats Trust: Oxford

- 3.9 The unique bar codes were used by ADAS to report results. All results were recorded in the central database by one member of staff and cross checked by a second member of staff before issuing to the project leader for review.

Qualifications

- 3.10 TEP Associate Director (Ecology) Elizabeth Seal underwent training on the eDNA sampling method with Dr Jeremy Biggs of the Freshwater Habitats Trust² on 11th April 2014. A copy of the certificate of this training can be provided on request. Following this Elizabeth devised a TEP internal training course covering theoretical and field based modules on eDNA sampling method, biosecurity measures and record keeping procedures. Only those TEP ecologists with GCN survey licences who have successfully undertaken this course are tasked with eDNA sampling.

Summary

- 3.11 An overview of the survey methods employed at each pond is presented in Table 2.

Table 2: Summary of field survey methods

Pond ID	Survey method used at pond	
	HSI Assessment	eDNA Survey
P1	Yes	Yes
P2	Yes	Yes
P3	Yes	No (Dry)
P4a	Yes	No (Dry)
P4b	Yes	No (Dry)
P5a	Yes	No (Dry)
P5b	Yes	Yes
P6	Yes	Yes
P7	Yes	No (Dry)
P8	Yes	Yes
P9	Yes	Yes
P10	Yes	Yes
P11	Yes	Yes
P12	No evidence of pond	

² Dr Briggs authored the 2014 DEFRA funded report on the eDNA survey method for great crested newts.

4.0 Results

Ecology Desk Study

- 4.1 The data search found 161 GCN records and 19 common toad records within 2km of the site. GCN records were identified within the site boundaries, and the closest record of common toad was recorded approximately 530m southeast of the site. Further details are available in the Ecology Desk Study (TEP Report Ref: 9134.002).

Habitat Suitability Index (HSI) Assessments

- 4.2 Pond descriptions and photographs are provided in Table 3 and the results of the HSI assessment surveys are presented in Table 4.
- 4.3 The suitability of ponds within the site to support GCN ranged from Poor to Excellent.

Table 3: Pond descriptions and photos

Pond Ref	Description and grid reference	Photograph
P1	SJ 38734 50924 A circular pond within an agricultural improved pasture. Willows and reed mace are present within the pond margins.	
P2	SJ 38821 51373 A circular pond in the centre of an agricultural grassland/pasture. Willows are growing along one edge and sedges are present in the margins.	

Pond Ref	Description and grid reference	Photograph
P3	SJ 38111 51119 A dry pond	
P4a	SJ 38300 51070 A dry pond, next to P4b, in a willow copse at the edge of an agricultural pasture. A hedgerow runs adjacent.	
P4b	SJ 38310 51090 A dry pond, next to P4a, in a willow copse at the edge of an agricultural pasture. A hedgerow runs adjacent.	
P5a	SJ 38470 51140 A dry pond in a woodland copse within an agricultural improved pasture. A hedgerow runs adjacent to the pond.	

Pond Ref	Description and grid reference	Photograph
P5b	SJ 38480 51130 A near-dry pond in a woodland copse within an agricultural improved pasture. A hedgerow runs adjacent to the pond.	
P6	SJ 38588 50936 A large pond within an area of agricultural grassland. Surrounded by tall ruderal and occasional willows.	
P7	SJ 38561 51412 A dry pond that likely holds water over winter, within a managed lawn area adjacent to Francis' Lane. A ditch and hedgerow run adjacent.	
P8	SJ 38514 51561 A circular pond underneath a hedgerow. Willow is present along one side and the other is disturbed by grazing.	

Pond Ref	Description and grid reference	Photograph
P9	SJ 38726 51620 A circular pond within the corner of an agricultural field, adjacent to the hedgerow. The pond is completely surrounded by willows, with some growing within the pond.	
P10	SJ 39037 51485 A circular pond within the middle of a field. The pond is disturbed by cattle and there is no vegetation in or around the margins, however a single willow is present in the centre.	
P11	SJ 39054 51243 A circular pond in a woodland copse in the middle of an agricultural pasture grazed by cattle.	
P12	No evidence of pond	

Table 4: HSI assessment result

Pond Ref	SI1 Location		SI2 Pond Area		SI3 Permanence		SI4 Water Quality		SI5 Shade		SI6 Waterfowl		SI7 Fish		SI8 Pond Density		SI9 Terrestrial Habitat		SI10 Macrophyte Cover		Overall HSI	
	Measure	Score	Measure	Score	Measure	Score	Measure	Score	Measure	Score	Measure	Score	Measure	Score	Measure	Score	Measure	Score	Measure	Score	HSI	Suitability
P1	A	1	550	1	Never	0.9	Moderate	0.67	30	1	Absent	1	Possible	0.67	30	1	Poor	0.33	50	0.8	0.80	Excellent
P2	A	1	350	0.7	Never	0.9	Moderate	0.67	5	1	Absent	1	Absent	1	38	1	Poor	0.33	20	0.5	0.77	Good
P3	A	1	250	0.5	Sometimes	0.5	Moderate	0.67	10	1	Absent	1	Absent	1	18	1	Poor	0.33	70	1	0.75	Good
P4a	A	1	50	0.1	Annually	0.1	Poor	0.33	100	0.2	Absent	1	Absent	1	21	1	Moderate	0.67	0	0.3	0.41	Poor
P4b	A	1	50	0.1	Annually	0.1	Poor	0.33	100	0.2	Absent	1	Absent	1	21	1	Moderate	0.67	0	0.3	0.41	Poor
P5a	A	1	50	0.1	Annually	0.1	Poor	0.33	50	1	Absent	1	Absent	1	29	1	Moderate	0.67	0	0.3	0.48	Poor
P5b	A	1	100	0.2	Annually	0.1	Poor	0.33	80	0.6	Absent	1	Absent	1	29	1	Moderate	0.67	0	0.3	0.49	Poor
P6	A	1	600	1	Never	0.9	Poor	0.33	15	1	Minor	0.67	Possible	0.67	61	1	Poor	0.33	25	0.55	0.69	Average
P7	A	1	50	0.1	Annually	0.1	Poor	0.33	90	0.4	Absent	1	Absent	1	37	1	Moderate	0.67	0	0.3	0.44	Poor
P8	A	1	50	0.1	Sometimes	0.5	Moderate	0.67	80	0.6	Minor	0.67	Possible	0.67	34	1	Moderate	0.67	10	0.4	0.55	Below average



Pond Ref	SI1 Location		SI2 Pond Area		SI3 Permanence		SI4 Water Quality		SI5 Shade		SI6 Waterfowl		SI7 Fish		SI8 Pond Density		SI9 Terrestrial Habitat		SI10 Macrophyte Cover		Overall HSI	
P9	A	1	50	0.1	Annually	0.1	Bad	0.01	100	0.2	Minor	0.67	Possible	0.67	37	1	Moderate	0.67	0	0.3	0.27	Poor
P10	A	1	400	0.8	Annually	0.1	Bad	0.01	15	1	Minor	0.67	Absent	1	38	1	Poor	0.33	0	0.3	0.37	Poor
P11	A	1	50	0.1	Sometimes	0.5	Poor	0.33	100	0.2	Minor	0.67	Possible	0.67	38	1	Poor	0.33	0	0.3	0.41	Poor

eDNA

- 4.4 The results of the eDNA surveys are presented in Table 5. GCN eDNA was identified in the on-site ponds P1 and P2, and the off-site pond P9. Ponds P5b and P10 returned indeterminate results for GCN eDNA. No GCN eDNA was identified in any of the other ponds during these surveys.

Table 5: eDNA survey results

Pond Ref	Survey Date	Surveyors	Score	GCN Present? (Y/N)
P1	20/06/2022	A McEwan	3 / 12	Y
P2	21/06/2022	A McEwan	2 / 12	Y
P3	Not surveyed – dry			
P4a	Not surveyed – dry			
P4b	Not surveyed – dry			
P5a	Not surveyed – dry			
P5b	20/06/2022	A McEwan	Indeterminate	
P6	20/06/2022	A McEwan	0 / 12	N
P7	Not surveyed – dry			
P8	21/06/2022	A McEwan	0 / 12	N
P9	21/06/2022	A McEwan	2 / 12	Y
P10	21/06/2022	A McEwan	Indeterminate	
P11	20/06/2022	A McEwan	0 / 12	N
P12	Not surveyed – no evidence of pond			

Results Summary

- 4.5 Table 6 and Drawing G9134.034 summarises the amphibian survey results.
- 4.6 No incidental evidence of common amphibian species such as common toad was found during the HSI or eDNA surveys.

Table 6: Summary of pond survey results

TEP Pond Ref	HSI Category	eDNA Survey
P1	Excellent	Present

TEP Pond Ref	HSI Category	eDNA Survey
P2	Good	Present
P3	Good	Not surveyed - dry
P4a	Poor	Not surveyed - dry
P4b	Poor	Not surveyed - dry
P5a	Poor	Not surveyed - dry
P5b	Poor	Indeterminate
P6	Average	Absent
P7	Poor	Not surveyed - dry
P8	Below average	Absent
P9	Poor	Present
P10	Poor	Indeterminate
P11	Poor	Absent
P12	Not surveyed – no evidence of pond	

5.0 Further Requirements

- 5.1 Ponds P5b and P10 returned indeterminate results for GCN eDNA, therefore the presence of GCN in these ponds cannot be ruled out. Indeterminate results can be caused by a variety of factors, including the water chemistry or the presence of high levels of sediment in samples, both of which can interfere with the DNA extraction process. Additional sampling of these ponds could be undertaken to determine the presence/absence of GCN. However, it has already been established that GCN are present in onsite and offsite ponds and Natural Resources Wales have agreed to the assumption that a large GCN population is present within the site, therefore additional surveys are not required.
- 5.2 As ponds P1, P2 and P9 tested positive for GCN eDNA, a licence from Natural Resources Wales will be required to facilitate any future development proposals. Following discussions with Natural Resources Wales it has been agreed that the use of eDNA and historic data will be acceptable to support the planning application.
- 5.3 GCN surveys are valid for at least 2 survey seasons and potentially 4 years or more depending on the specific use of the data, local conditions and the potential impact predicted on GCN. When data is greater than 2 years old advice should be sought from an appropriately experienced ecologist.

Licensing

- 5.4 GCN have been recorded at ponds P1, P2 and P9 and are therefore likely to be affected by development proposals at the site. A Natural Resources Wales license will be required to legally permit works on site.
- 5.5 Traditional EPS licencing will be required. Under a traditional EPS licence, mitigation for impacts on GCN will be required. The impacts of the proposed development and proposed mitigation are assessed in the accompanying ES Chapter (TEP Report Ref: 9134.011).

DRAWINGS

G9134.034 - Great Crested Newt Survey Results



KEY

- Site boundary
- Great Crested Newt Survey Results**
- Pond with negative eDNA result
- Pond with positive eDNA result
- Pond with indeterminate eDNA result
- Dry pond
- Pond no longer in situ

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Site Map

Rev	Description	Drawn	Approved	Date



THE ENVIRONMENT PARTNERSHIP

Genesis Centre, Birchwood Science Park, Warrington WA3 7BH
Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project
Land North of Bryn Lane, Wrexham

Title
Great Crested Newt Survey Results

Drawing Number
G9134.034

Drawn	Checked	Approved	Scale	Date
SP	BJ	PP	1:4,054 @ A3	25/04/2023



HEAD OFFICE

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International Business
Centre,
Mulgrave Terrace,
Gateshead
NE8 1AN

Tel: 0191 605 3340
E-mail: gateshead@tep.uk.com

LONDON

8 Trinity Street,
London,
SE1 1DB

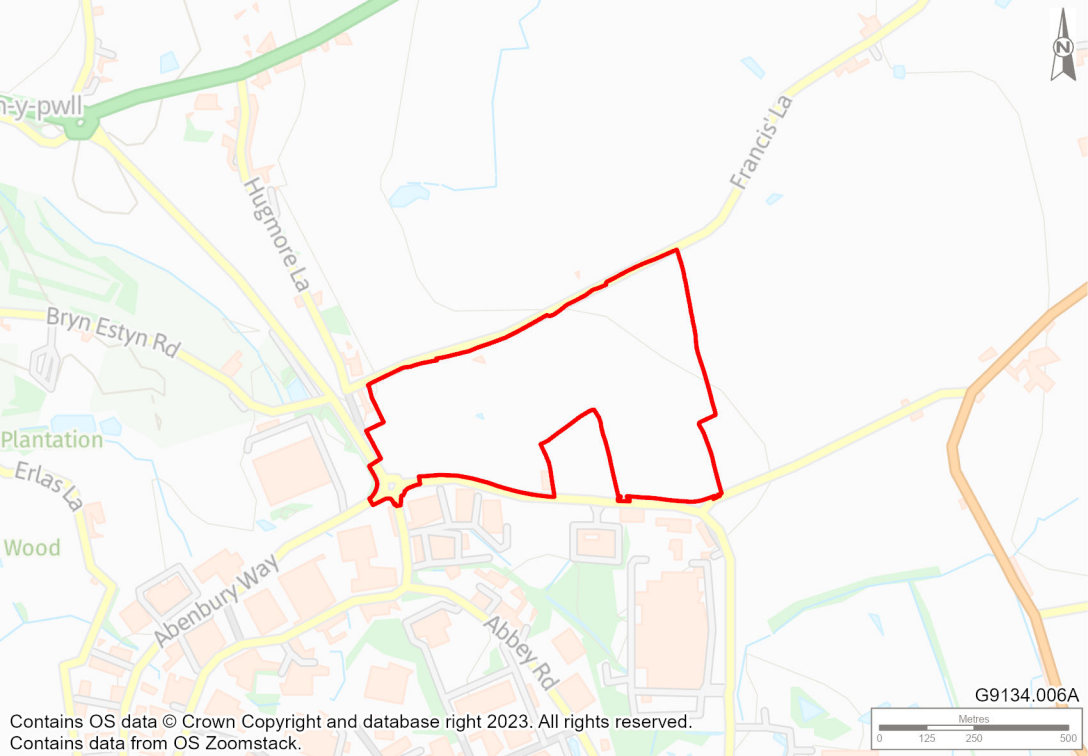
Tel: 020 3096 6050
E-mail: london@tep.uk.com

CORNWALL

4 Park Noweth,
Churchtown,
Cury,
Helston
Cornwall
TR12 7BW

Tel: 01326 240081
E-mail: cornwall@tep.uk.com

Annex K.2 – Scaled maps/plans



n-y-pwll

Hugmore La

Francis' La

Bryn Estyn Rd

Plantation

Erlas La

Wood

Abenbury Way

Abbey Rd

G9134.006A

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A534

Clays Golf Club

Bryn Estyn Road

Black Wood Way

Hugmore Lane

Francis Lane

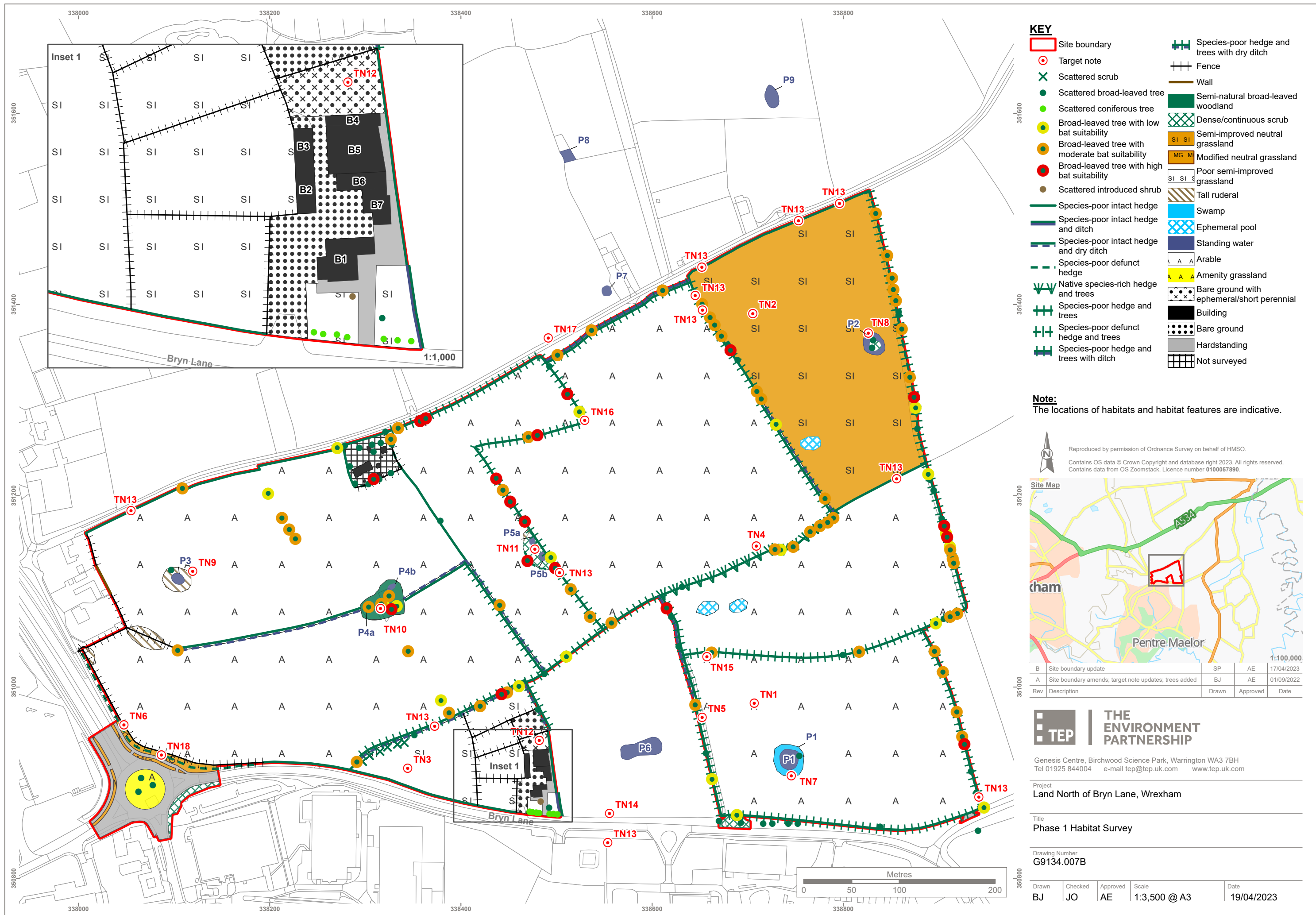
B5130

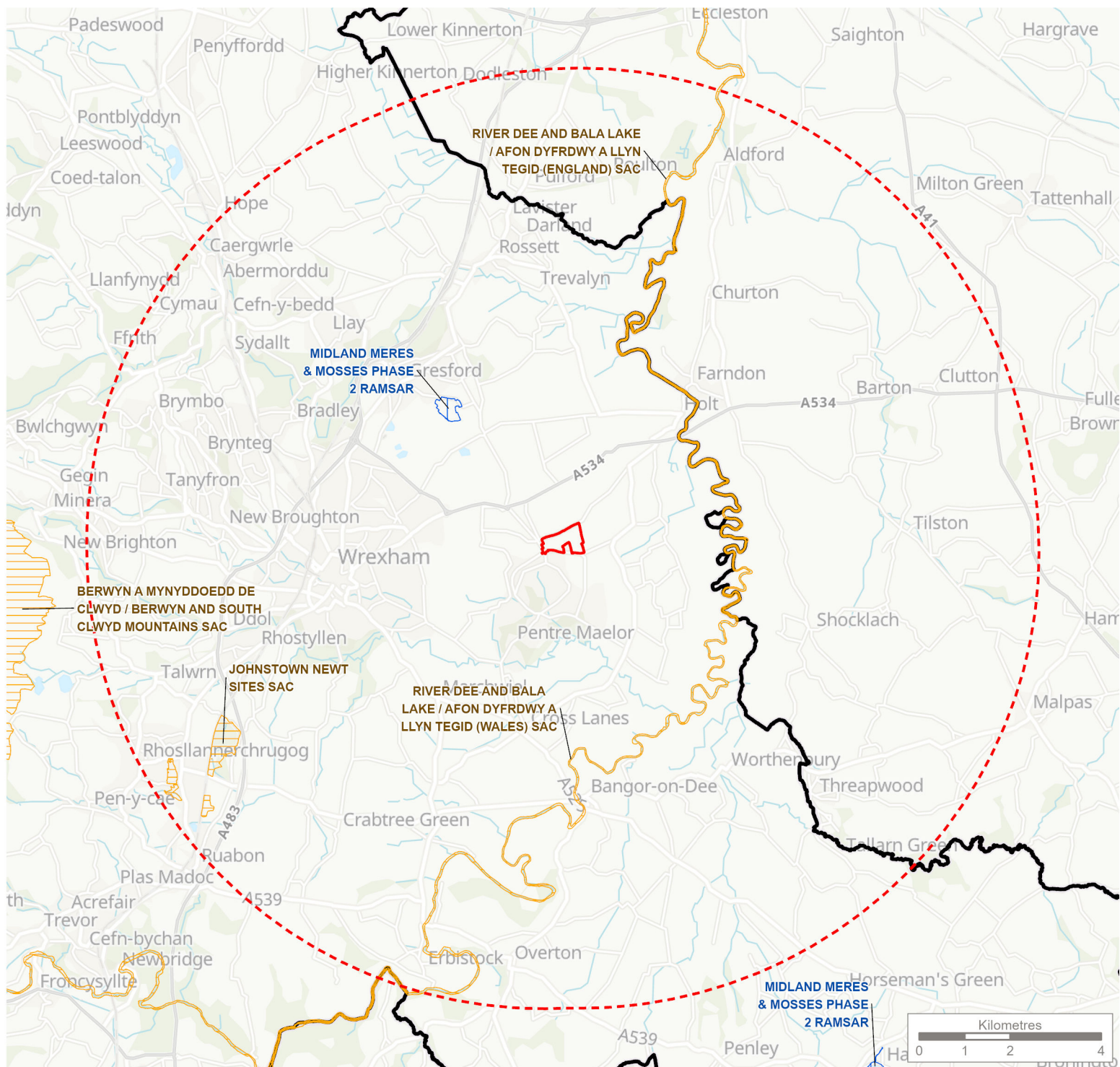
Erlas Lane

Abenbury Way

Bryn Lane

G9134.041





- Key**
- Site boundary
 - Site boundary - 10km buffer
 - Ramsar
 - Special Area of Conservation (SAC)
 - Wales/England Border

Sites searched for were as follows:

- Ramsar
- Special Protection Areas (SPA)
- Special Areas of Conservation (SAC)

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Project		
Land North of Bryn Lane, Wrexham		
Title		
Internationally Designated Sites Within a 10km Buffer		
Drawing Number		
G9134.001A		
Scale	Date	
1:120,000 @ A4	20/04/2023	
Drawn	Checked	Approved
SP	BJ	AE

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KEY

Application boundary

Great Crested Newt Survey Results 2022

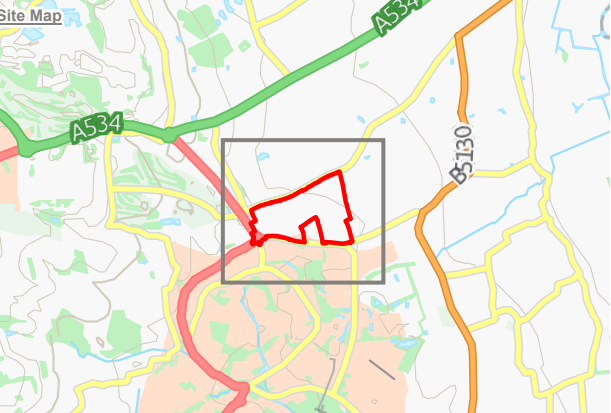
- Pond with negative eDNA result
- Pond with positive eDNA result
- Pond with indeterminate eDNA result
- Dry pond
- Pond no longer in situ

Great Crested Newt Survey Results 2025

- Pond with negative eDNA result
- Pond with positive eDNA result
- Dry pond
- Pond no longer in situ
- Pond with no access

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C	Update to boundary.	MC	LG	24/02/2026
B	Addition of 2025 results	SP	HS	20/06/2025
Rev	Description	Drawn	Approved	Date

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Project
Land North of Bryn Lane, Wrexham

Title
Great Crested Newt Survey Results 2022 - 2025

Drawing Number
G9134.034C

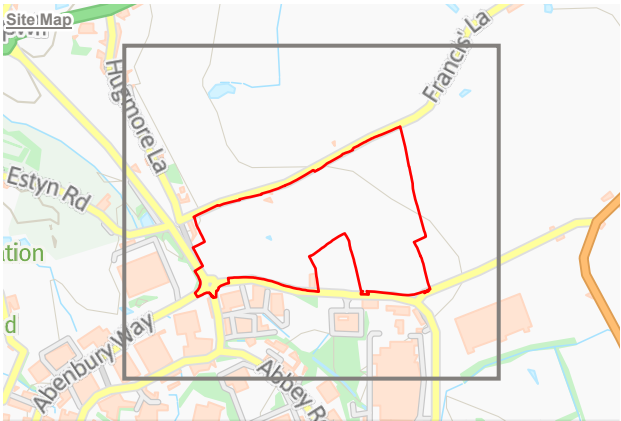
Drawn	Checked	Approved	Scale	Date
SP	BJ	PP	1:5,000 @ A3	24/02/2026



KEY

- Site boundary
- Proposed new fencing
- Pond to be drained down

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Rev	Description	Drawn	Approved	Date

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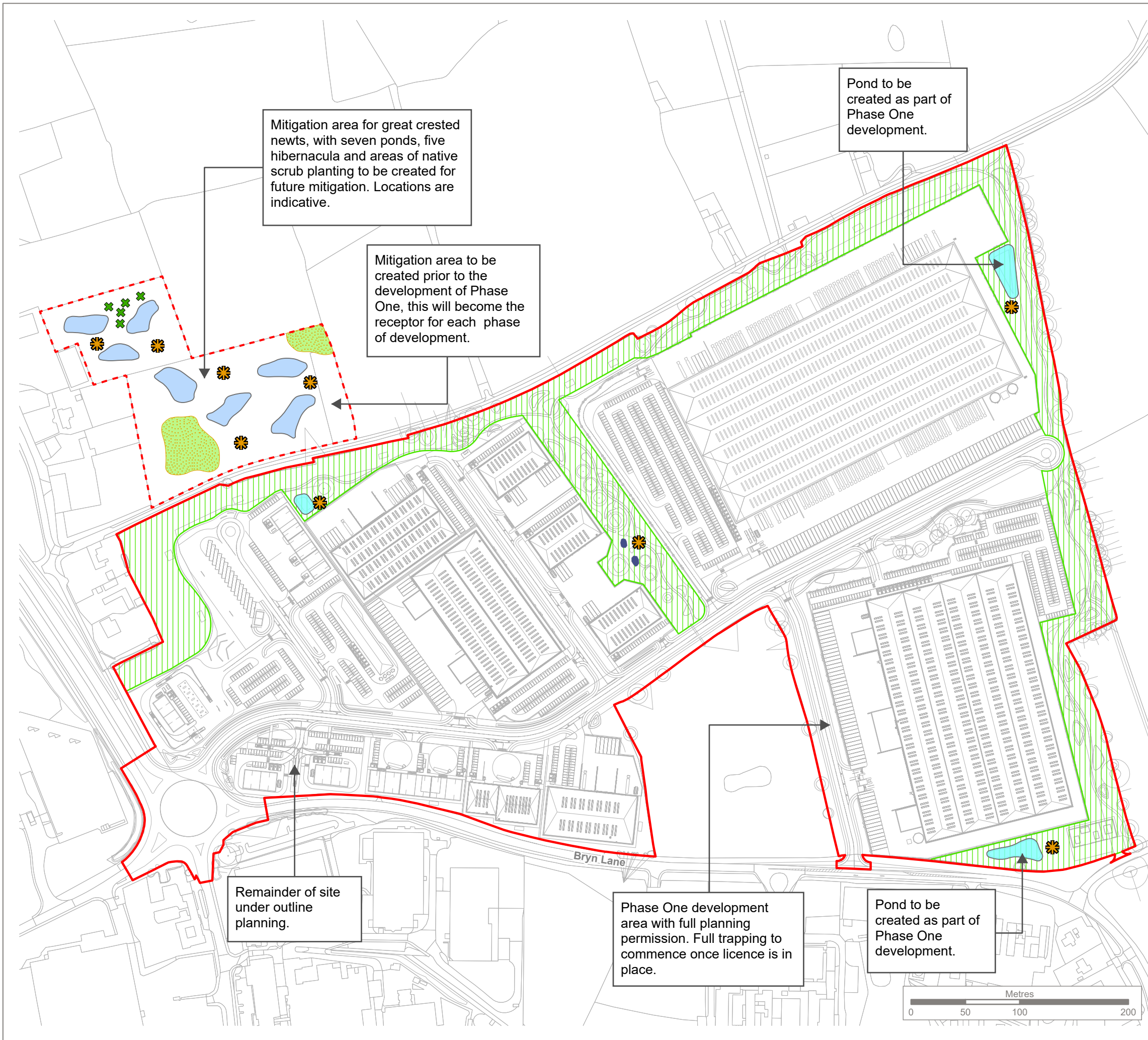
401 Faraday Street, Birchwood Park, Warrington, WA3 6GA
Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project
Land North of Bryn Lane, Wrexham

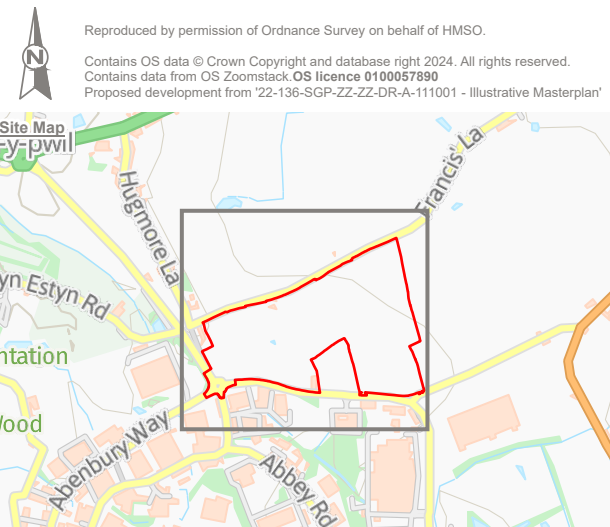
Title
Fencing Plan

Drawing Number
G9143.038

Drawn	Checked	Approved	Scale	Date
BJ	SP	LG	1:5,000 @ A3	19/06/2024



- KEY**
- Site boundary
 - Great crested newt mitigation area
 - Existing pond to be retained
 - Green corridor
- Great Crested Newt Mitigation**
- Proposed hibernacula
 - Scrub native planting
 - Replacement pond
 - New mitigation pond
 - Scrub native planting



Rev	Description	Drawn	Approved	Date



THE ENVIRONMENT PARTNERSHIP

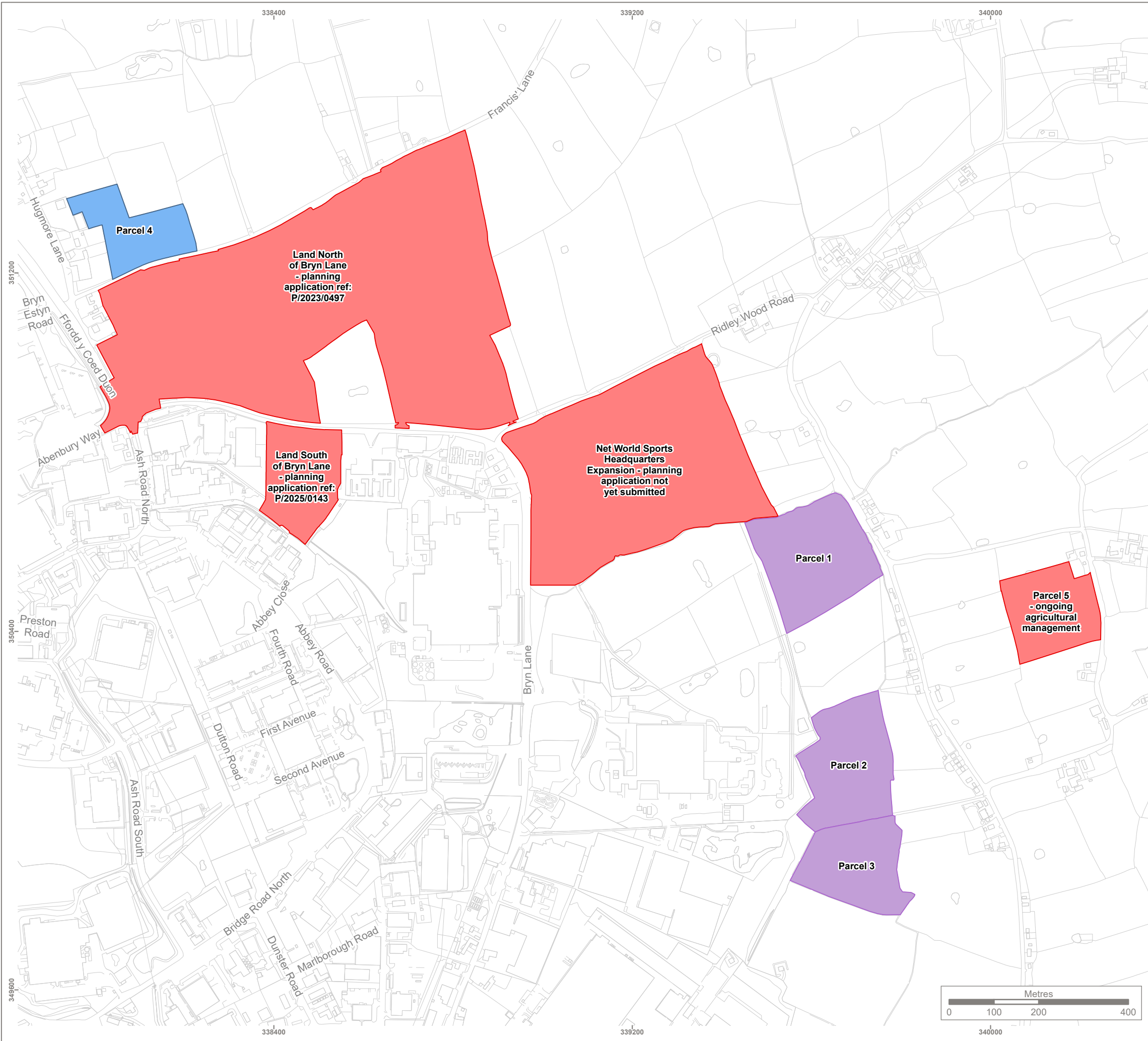
401 Faraday Street, Birchwood Park, Warrington, WA3 6GA
Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project
Land North of Bryn Lane, Wrexham

Title
Additional Great Crested Newt Mitigation Site

Drawing Number
G9134.040

Drawn	Checked	Approved	Scale	Date
MK	SP	LG	1:3,500 @ A3	24/07/2024



KEY

Construction Phase

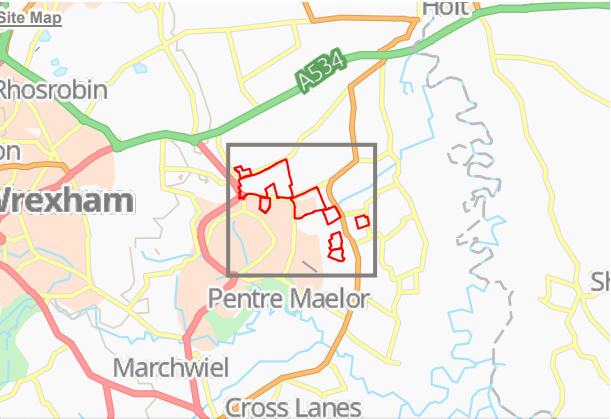
- Autumn 2025
- Autumn 2026

Applicant Owned Land

- Other land in applicant ownership



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A	Update to Parcel 5 management details.	MG	MT	23/07/2025
Rev	Description	Drawn	Approved	Date



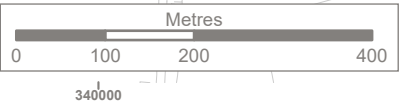
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Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project
Land North of Bryn Lane, Wrexham

Title
Great Crested Newt Off-Site Mitigation Phasing Plan

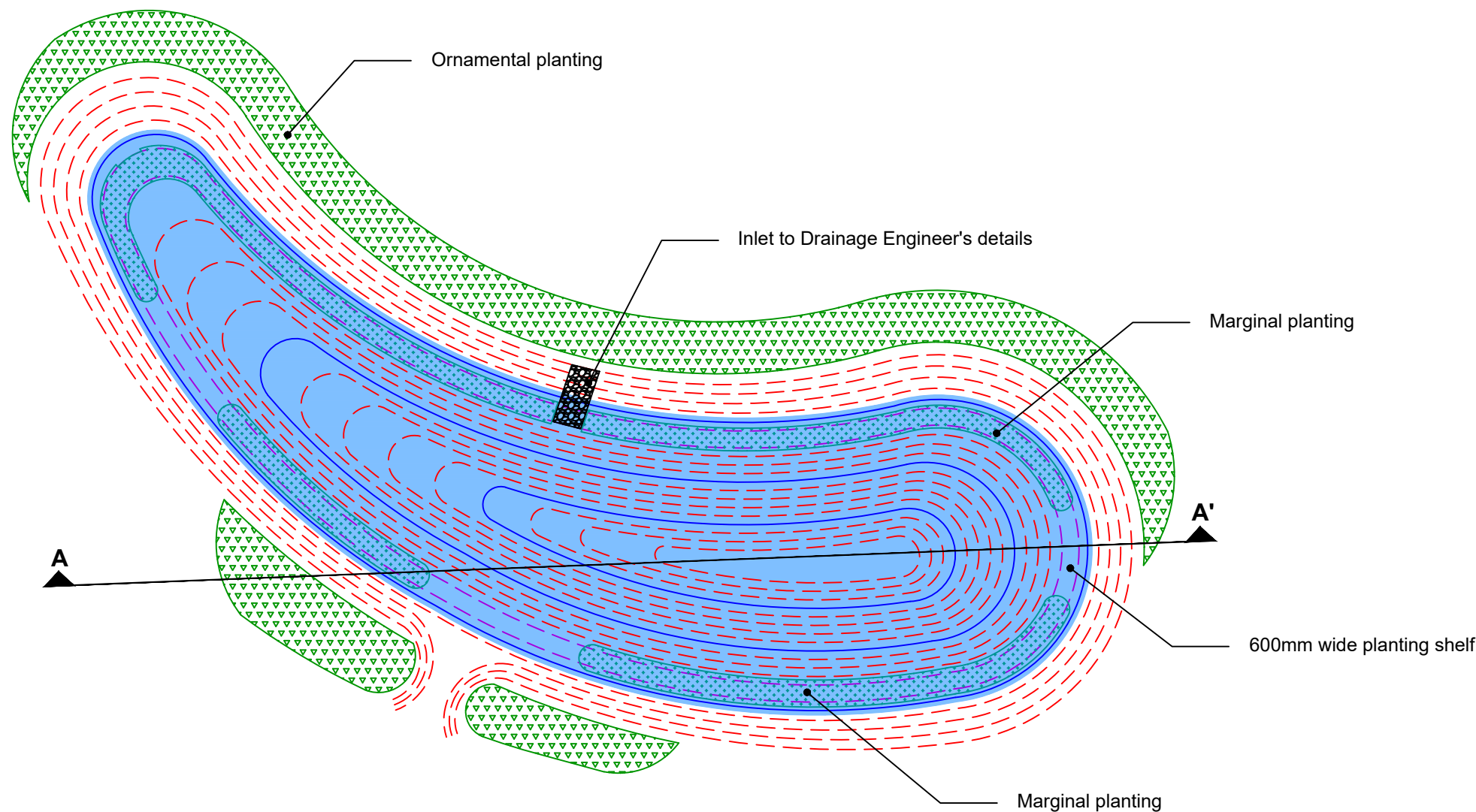
Drawing Number
G9134.042A

Drawn	Checked	Approved	Scale	Date
MG	SP	MT	1:8,500 @ A3	18/07/2025

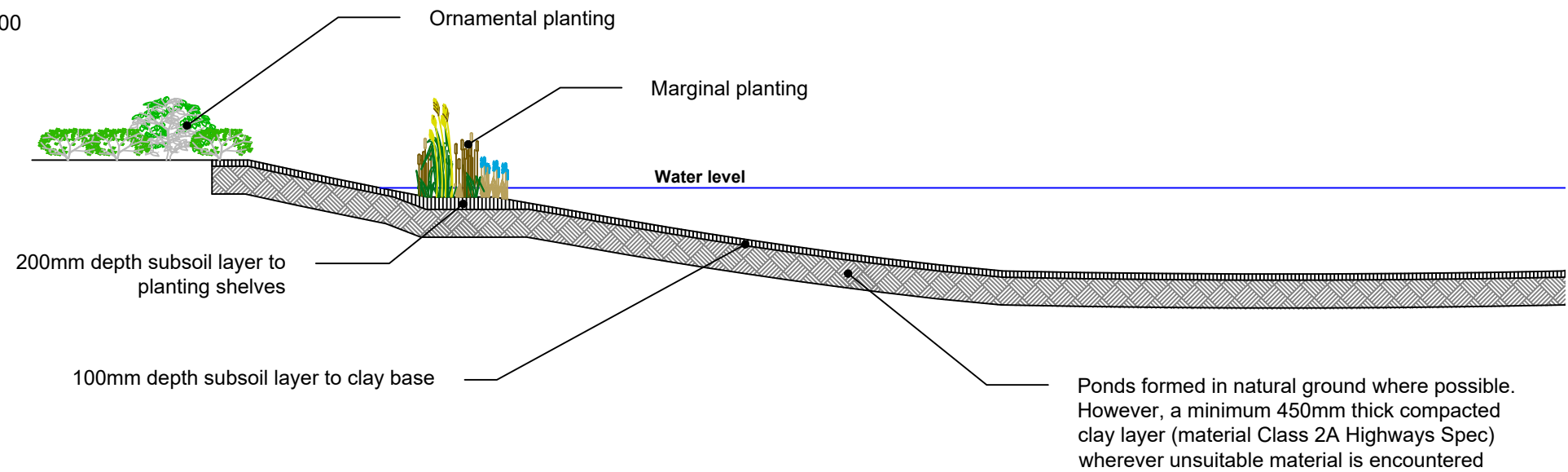




Plan
Scale 1:100



Section
Scale 1:100



NOTES

1. Do not scale from this drawing.
2. Pond slopes to be maximum of 1:3 gradient.
3. TEP recommends that the existing clay soils are tested to ensure competency for holding and retaining water.
4. Exploratory holes should be undertaken within the area of the proposed pond to see if it is affected by deposits of granular soils that would be unsuitable for retaining water. Within such areas it would be considered necessary to form a compacted clay liner of recommended minimum thickness 450mm ($k < 10^{-10}$ m/s). Where the excavation reverts to competent clay it is recommended that the liner extends beyond the unsuitable granular material for a distance at least equivalent to the liner thickness.
5. Where competent clay is revealed within the 'footprint' of the proposed pond it is considered that no liner is necessary but it is recommended that checks are undertaken to ensure that the clay continues below bed level for a depth of 450mm. This could be accomplished by checking at intervals of, say 6 metre centres throughout the excavated area. Similarly, it is recommended that checks on the sides of the pond/ditch are undertaken to ensure that a similar clay thickness is available. If the general clay thickness is less than 450mm it is recommended that the clay is removed and replaced by a compacted clay liner. Where shallow excavations are carried out to check the clay thickness these should be kept to as small an area as possible and the clay arisings should be adequately compacted during subsequent backfilling such that the overall integrity of the clay cover is not compromised.
6. The clay used for forming a lining should not be too stony, wet or dry. It should also be free of any organic or similar degradable material and be compacted in layers of a suitable thickness in accordance with the Specification for Highways Works 1998 (for a class 2A material) using a tamping roller. Clay considered unsuitable, together with any other non-suitable material such as granular or organic soils should be stockpiled separately to the suitable clay deposits to avoid cross-contamination occurring.
7. Where obviously weak clays having high moisture content are encountered, these should be discarded or allowed to dry. Where there is any doubt, testing should be carried out to determine the natural moisture content.
8. Where there is doubt as to the integrity/compaction of the clay liner it is recommended that checks on the in-situ density are carried out using the core cutter method.
9. It is the Contractors responsibility to ensure that the existing and new clay liner is appropriately puddled to ensure water retention. The Contractor should test the clay liner for water loss prior to installing the subsoil layer. Any leak should be found and remedied prior to installing the subsoil layer and planting of the pond.

A	Update title block, amend text size	JW	GA	15/08/23
Rev	Description	Drawn	Approved	Date



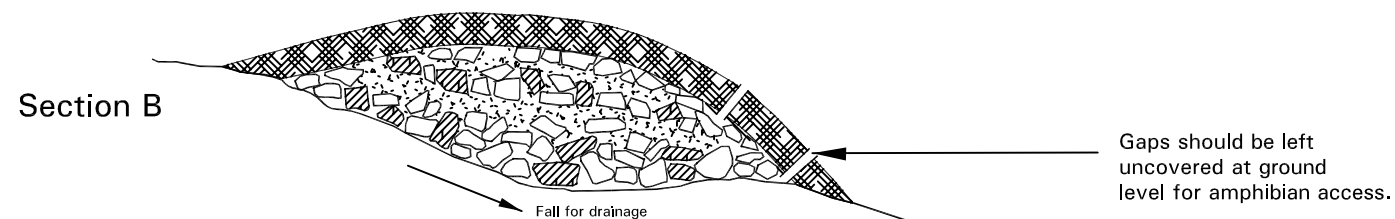
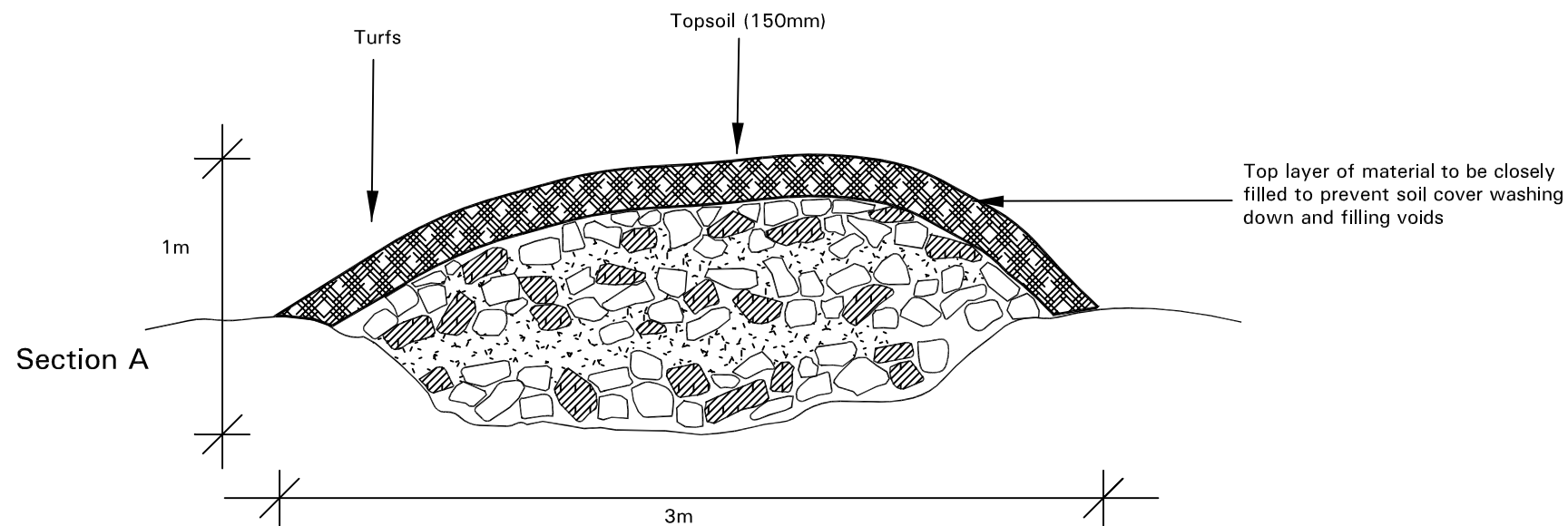
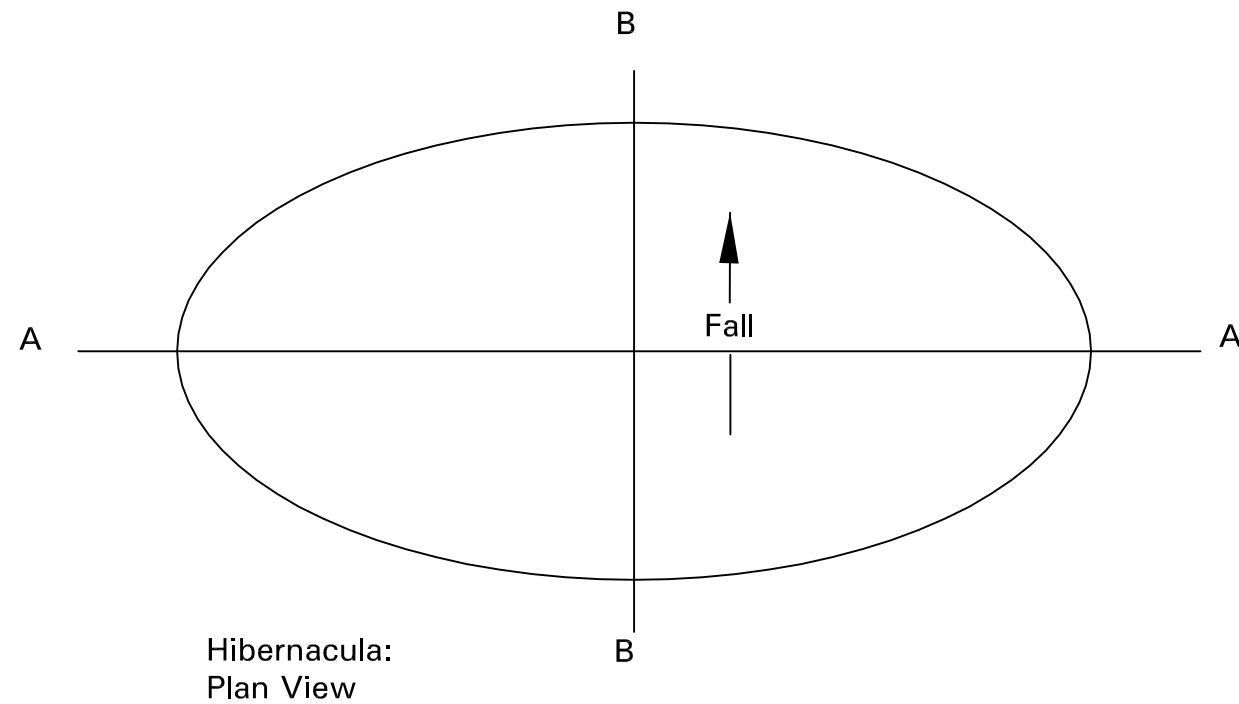
Genesis Centre, Birchwood Science Park, Warrington WA3 7BH
Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project
Standard Details

Title
Pond Construction - Clay base

Drawing Number
TEP.AQU.004A

Drawn	Checked	Approved	Scale	Date
RC	GDA	GDA	As shown @ A3	04/08/17



- Notes:
- The hibernacula is to be no less than 2m length x 1m width x 1m height.
 - Turfs are removed prior to excavation for re-use.
 - The hibernacula is to be constructed from new, clean bricks, (brick sizes to be half and full brick) and/or untreated logs.
 - Vertical gaps to be no more than 50% filled with soil / vegetative matter so that voids are created for amphibians.
 - Bricks or logs to be hand placed, roughly coursed with some bricks placed at 45° to the ground and locally found soil / dead leaves / grass roots to be placed in 300mm layers between courses.
 - The mound is to be covered with 150mm topsoil and turfs.

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Revision	Description	Amended by	Date

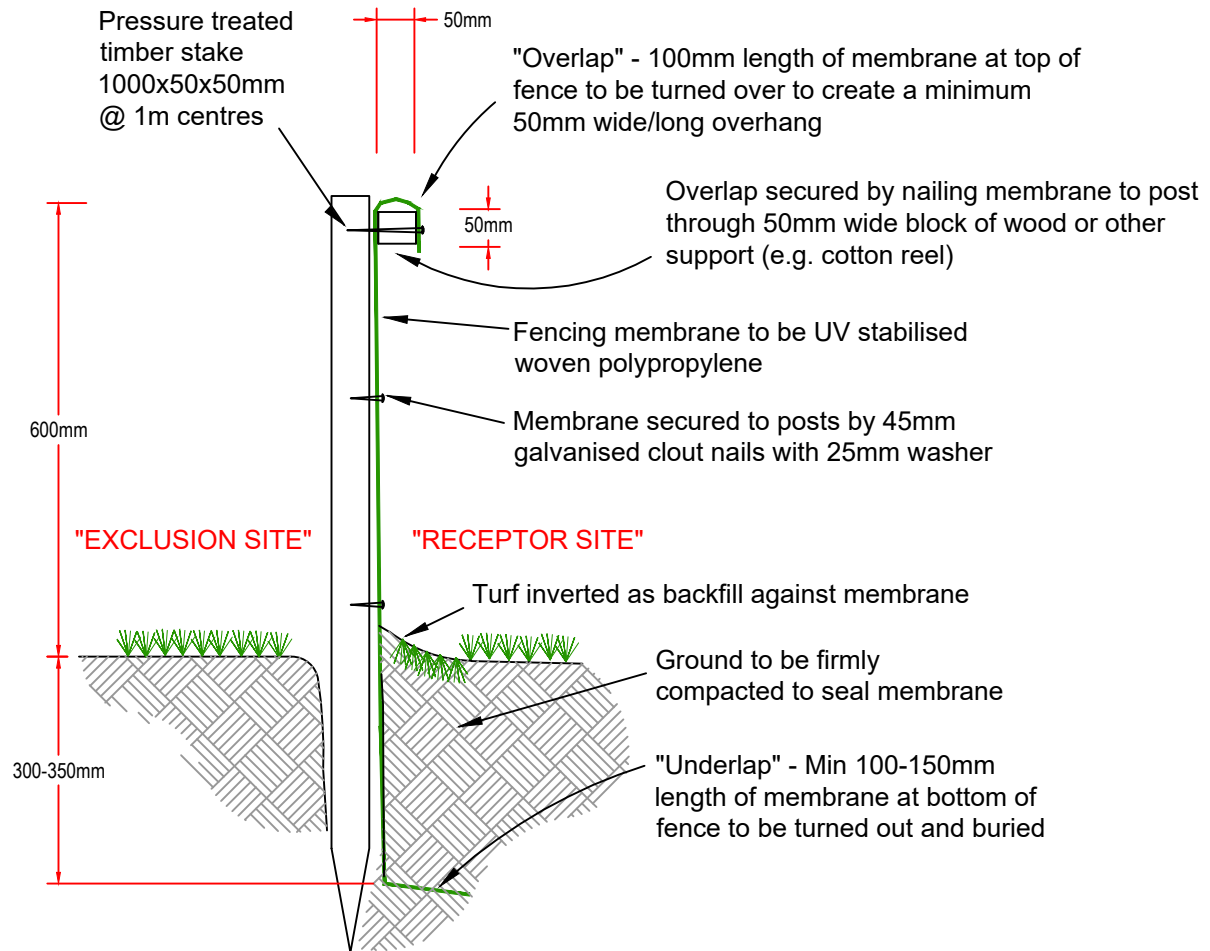


Genesis Centre
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Project		
Broughton Residential Development		
Title		
Amphibian Hibernacula		
Drwg No	TEP.MIS.010	
Scale	Hibernacula 1:25 @ A3	
Drawn by	Checked by	Date
TH	GDA	April'03

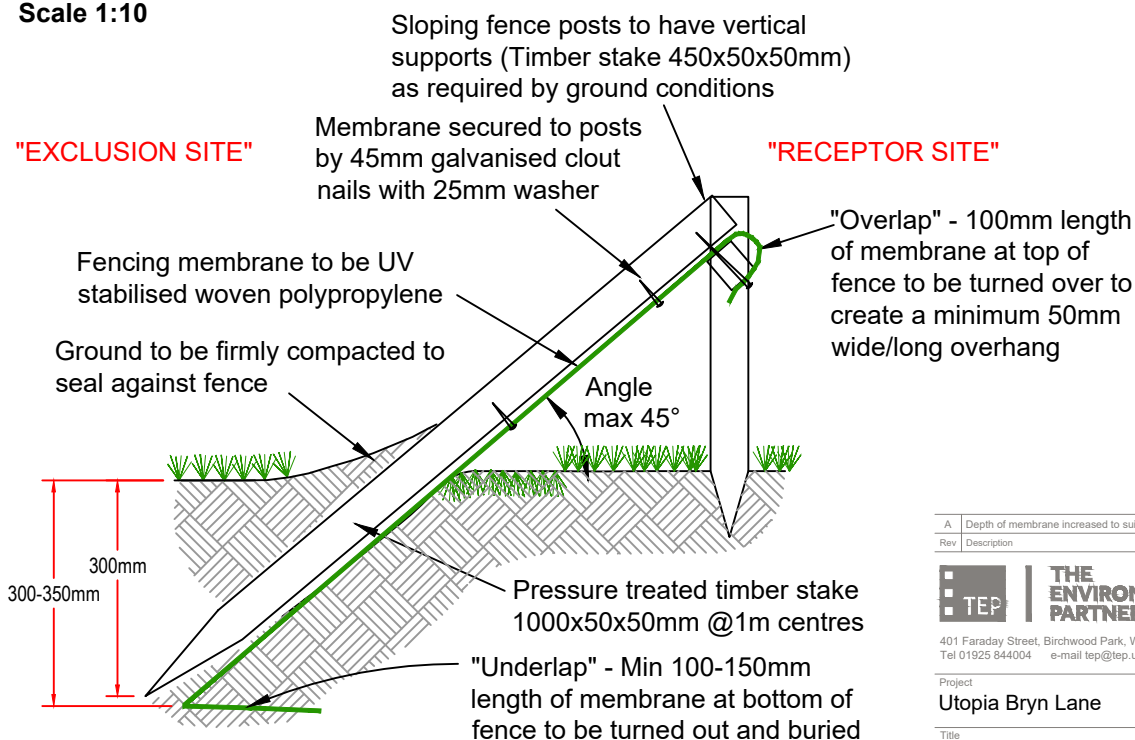
VERTICAL AMPHIBIAN EXCLUSION FENCING

Scale 1:10



ONE-WAY AMPHIBIAN EXCLUSION FENCING

Scale 1:10



A	Depth of membrane increased to suit comments	RJC	LG	10/10/25
Rev	Description	Drawn	Approved	Date

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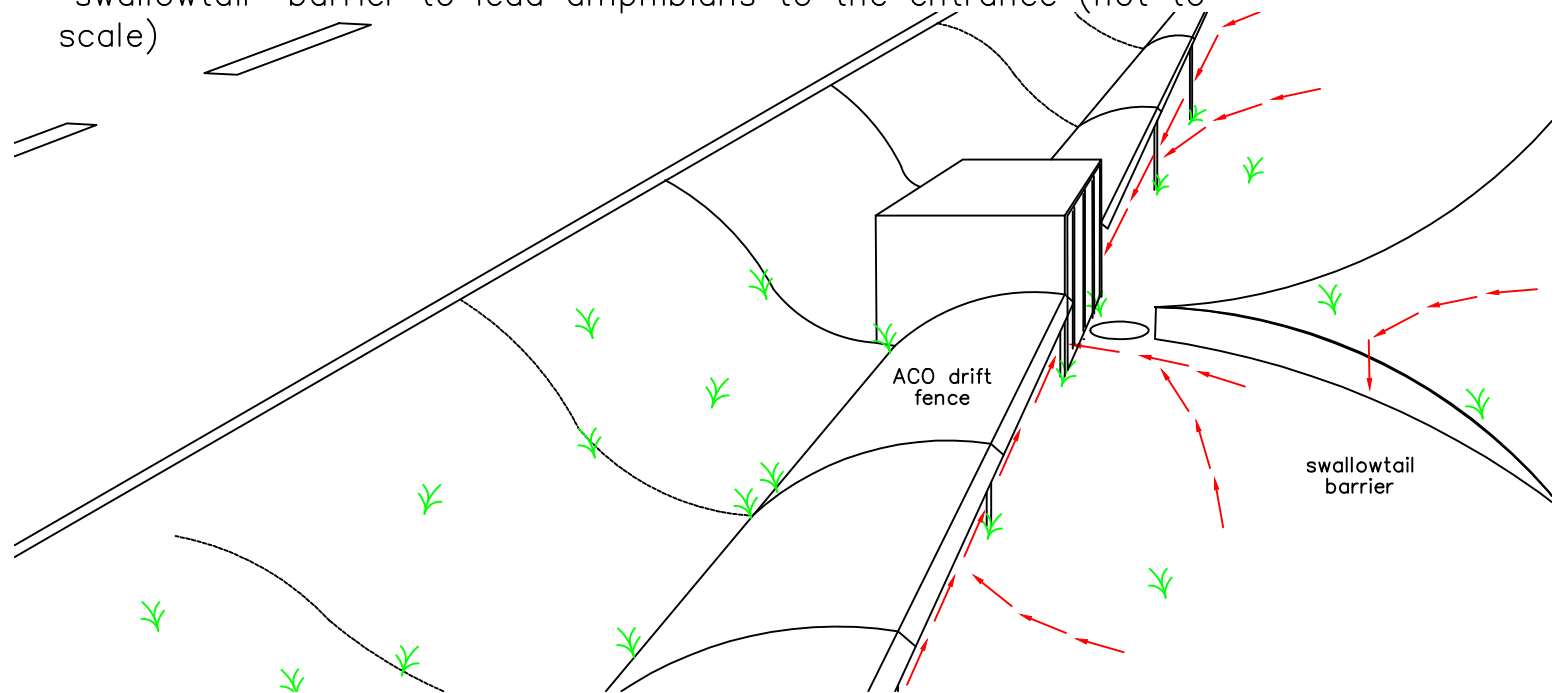
Project
Utopia Bryn Lane

Title
Temporary Amphibian Fencing

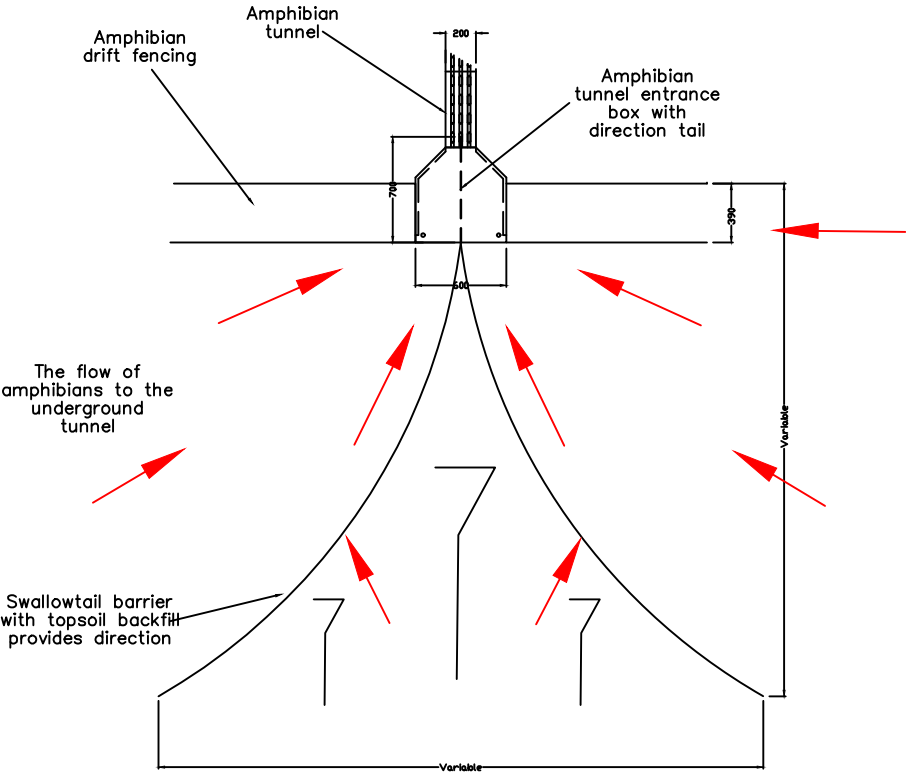
Drawing Number
D9134.002A (Figure: TEP.ECO.001)

Drawn	Checked	Approved	Scale	Date
RJC	LG	LG	1:10 @ A4	10/09/2025

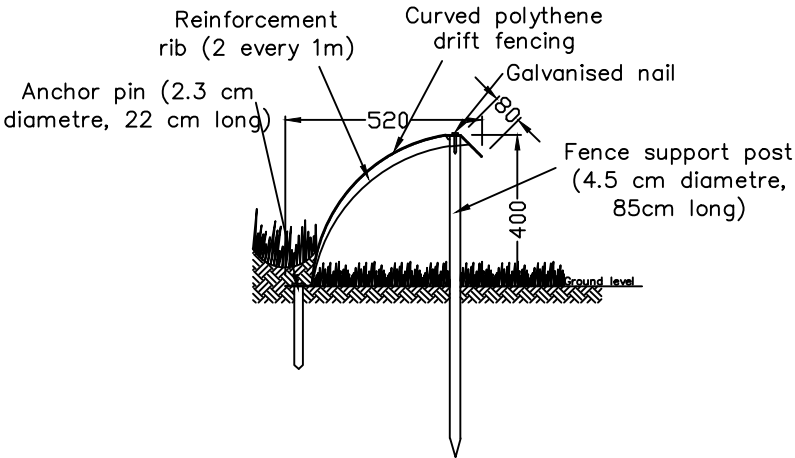
CONCEPT: ACO drift fence with ACO tunnel incorporating a "swallowtail" barrier to lead amphibians to the entrance (not to scale)



DETAIL 1: AMPHIBIAN TUNNEL WITH ENTRANCE BOX, SCALE1/50 @A3



DETAIL 2: DRIFT FENCING, SCALE1/25 @A3



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A	New drawing template	NVF	GDA	04.04.16
Rev	Description	Drawn	Approved	Date



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Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project
TEP Details

Title
Sub-surface Amphibian Tunnel

Drawing Number
TEP.MIS.018A

Drawn	Checked	Approved	Scale	Date
GJ	FH	FH	As labelled @ A3	01/01/2003

Rev	Date	By	Description
A	24/03/2023	JMS	Revised to the with comments received from HWS
B	15/03/2023	JMS	Revised to the with CSRE comments
C	27/03/2023	AZ	Changes made to the with comments received at design team meeting on 27.03.2023
D	28/03/2023	AZ	Area Schedule updated
E	28/03/2023	AZ	Changes made to the with comments received at design team meeting on 28.03.2023
F	06/04/2023	JMS	Existing pond location added
G	24/04/2023	AZ	Revised Landscape layout received from HWS on 19/05/2023
H	19/05/2023	AZ	New Landscape and Proposed Surface Drainage layout incorporated
I	16/06/2023	AZ	Landscape Layout coordinated
J	03/07/2023	JMS	Quotational amendments made to the with CSRE comments on 06/07/23
K	26/10/2023	JMS	Updated to reflect new price and P&B
L	18/10/2023	JMS	Quotational location updated
M	28/10/2023	MW	Updated to latest masterplan design

LEGEND	
	Application Boundary 37.21Ha II 91.94Ac
	Ownership Boundary 89.30Ha II 220.66Ac
	Development Boundary
	Retained Trees
	Retained Ponds
	Proposed Ponds
	Veteran Tree Buffer
	Proposed Green Corridor
	Easement Zone

Note: Plan is for illustrative purposes only - not for approval.

Refer to landscaping plan for landscaping details.

For details of proposed bunds, please refer to Tier Levels Plan.



SGP

Architects + Masterplanners

Waterfront House
2a Smith Way
Grove Park
Enderby
Leicester LE19 1SX

t: +44 (0)116 247 0557

www.stephengeorge.co.uk

Wrexham
Bryn Lane

Drawing Name:
Illustrative Masterplan

Drawing Stage: PLANNING

Status: S2

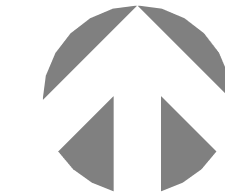
SCP File Ref: 22136-SGP-ZZ-ZZ-MS-A-000005

22-136 03/02/2023 AZ MMS 1:1250 @ A0

SGP Project No. Date Drawn: Text Scale File

Drawing Number:
22136-SGP-XX-ZZ-DR-A-11001

Print Code: Program: Version: User: Name



SCALE 1:1250

25m 125m

Proposed Illustrative Site Masterplan

1 : 1250

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Annex K.3 – GCN HSI results for P1, P2, P10 and P11 from further surveys in 2025

Pond	Comment	GPS Location	Date	SI1 - Geographic Location		SI2 - Pond area m2 (TO NEAREST 50M ²)		SI3 - Pond drying		SI4 - Water quality		SI5 - Shading %		SI6 - Presence of waterfowl		SI7 - Presence of fish		SI8 - Ponds density (ponds/km2)		SI9 - Terrestrial habitat quality		SI10 - Macrophyte cover in pond		HSI	
				Measure	SI score	Measure	SI score	Measure	SI score	Measure	SI score	Measure	SI score	Measure	SI score	Measure	SI score	Measure	SI score	Measure	SI score	Measure	SI score	SUITABILITY	SI score
1	Circular pond which fluctuates from central basin. No banks at high water. Willow scrub dominates the eastern half. Located within fallow cropland, with lots of tall forbs and grasses. No poaching. Fringed with marginal vegetation like typha sp., willowherb sp. and hard rush. Some aquatic vegetation.	///dignify.jabs.united	25/03/2025	A (optimal)	1	350	0.7	Sometimes	0.5	Good	1	50	1	Minor	0.67	Absent	1	12	0.975	Good	1	0	0.3	Good	0.76
2	Oval-shaped pond. Fluctuates from central basin. No banks at high water. Likely to dry out. Dominated by willow scrub. Located in modified grassland field, which is sheep grazed. Surrounded by hard and soft rush at margins. Floating sweet grass is present within the water.	///handrail.finest.dance	25/03/2025	A (optimal)	1	300	0.6	Sometimes	0.5	Moderate	0.67	100	0.2	Minor	0.67	Absent	1	12	0.975	Moderate	0.67	0	0.3	Below Average	0.59
10	Circular pond. Fluctuates from central basin. No banks at high water. Could dry out. Contains one willow tree. Located in modified grassland field, which is sheep grazed. Some bare ground due to wild fowl access. Rare soft rush present within water but otherwise no aquatic vegetation.	///internet.shapeless.beamed	25/03/2025	A (optimal)	1	300	0.6	Sometimes	0.5	Moderate	0.67	10	1	Minor	0.67	Absent	1	12	0.975	Moderate	0.67	0	0.3	Average	0.70
11	Figure-of-eight shaped pond. Fluctuates from central basin. No banks at high water. Could dry out. Located in modified grassland field, which is sheep grazed. Contains willow scrub which dominates the northern section. Evidence of animal poaching. No marginal or in-water vegetation.	///twin.buggy.plodding	25/03/2025	A (optimal)	1	200	0.4	Sometimes	0.5	Moderate	0.67	70	0.8	Minor	0.67	Absent	1	12	0.975	Moderate	0.67	0	0.3	Average	0.65

Annex K.4 - Table displaying NRW feedback and relevant amended paragraphs within Method Statement

Feedback from NRW (CAS-289100-P7C1)	Relevant paragraph(s) within Method Statement addressing this
We advise that an over-arching strategy and approach to licensing the various Net World Sports developments at Wrexham Industrial Estate is considered. We would advocate that a new licence application is submitted that includes all land in plan number G9134.42A where planning consents have been approved and any ecological reserved conditions discharged. Each new planning application will need to request the revocation (relinquishment) of any previous extant licence and all conditions and obligations required under the extant licence transferred to the new licence amendment.	This change has not been made at this stage but may be considered after approval of the planning application
Sections B.2.3 and B.2.4 refer to the Site Masterplan reference 22-136-SGP-ZZ-ZZDR-A-111001 regarding Phase 1 and future phases of development at that application site. Given the large number of amended documents associated with this application, we advise that a copy of the Site Masterplan is included as an Appendix to the EPS Development Licence Method Statement for clarity.	Paragraphs B.2.3 and B.2.4
We advise that section C.1 is updated to include detailed information regarding extant records of GCN and the current conservation status (CCS) of GCN on site and within the environs. NRW consider the CCS of the Wrexham Industrial Estate and environs GCN population to be unfavourable therefore proposals need to take this into account to restore the population to favourable conservation status (FCS)	Paragraphs C.1.1 to C.1.3, and C.8.3
We advise that additional survey data should be submitted as the data referred to in both sections C.6.1, C.6.2 and Table 1 was collected in June 2022. We advise that survey data should not be older than two years old.	Paragraphs C.6.1, C.6.2, C.7.1 and C.7.2, and Table 1 and Table 2.
Section C.8 does not provide any interpretation of survey results in relation to published reports regarding GCN within the context of the environment. We advise that section C.8 is updated to refer to the following published reports: - o The North-East Wales Pondscape in Nicolet, P; Weatherby, A.; Biggs, J., Williams, P., and Hatton-Ellis. T. (2007) A preliminary assessment of Important Areas for Ponds (IAPs) in Wales (Report Prepared by Pond Conservation for the Countryside Council for Wales) - o Review of the Current Conservation Status (CCS) of the Great Crested Newt in Wales, with specific references to its long-term prospects and within its stronghold in North-East Wales, Report No 259, NRW, 2018 - o Spatial Action Plan for Great Crested Newts in Wrexham, Report No 77, NRW 2017	Paragraphs C.8.6 to C.8.8

Feedback from NRW (CAS-289100-P7C1)	Relevant paragraph(s) within Method Statement addressing this
The document list under section E.2.4.1 may need to be updated once the temporary fencing specification has been amended to the recommended depth of 300-350mm. the list should also be updated to include the Site Masterplan 22-136-SGP-ZZ-ZZ-DR-A-111001 once added to the Appendix	Paragraph E.2.4.1
We note that section E.3.3.3 states “The use of salt on roads and footpath in cold weather will be prohibited and alternative should be used”. We concur that salt should not be used and advise that the text is amended to state: o The use of salt on roads and footpaths in cold weather will be prohibited and alternatives will be used subject to the approval of NRW (through the licensing process).	Paragraph E.3.3.3
In relation to section F, in our view different approaches regarding tenure will be required in respect of on-site and off-site land. The rationale for this is that the onsite scheme is multifunctional whereas the offsite areas are for nature conservation purpose only. As previously advised, the long-term occupier(s) of the off-site ecology areas will need to accord with the definition of a responsible body under Part 7 of the Environment Act 2021. This body must be appointed and occupying one or more of the off-site ecology areas before the commencement of the operational phase of the proposals.	This change has not been made
The long-term funding will need to be confirmed within the provisions of any future licence application. We note and concur with the approach described in section F.1.3 that estate management charges will be levied on all future occupiers to provide long-term site management, monitoring and wardening throughout the operational phase of the proposals.	Paragraph F.1.3
Section F.2 - in line with comments regarding section 4.2 of the HMP below, we advise that owing to the importance of the Wrexham Industrial Estate GCN population, 25 years is too short a duration, therefore surveillance will be necessary throughout the operational phase of the proposals.	This change has not been made
We note the timetable of works in section G and advise that the following additional activity is included within the table: o Transfer of occupancy of one or more ecology areas before commencement of the operational phase of the proposals	This change has not been made
We note that section H.2.1 states “All land used for GCN mitigation will remain under the ownership and management of the developer Networkworld post completion. An appropriate ecological consultants with GCN licences will be employed to support the developer owner”. We continue to advise that the occupancy of off-site ecology areas is transferred to a body that accords with the definition of a responsible body under part 7 of the Environment Act 2021	This change has not been made

Feedback from NRW (CAS-299921-J0C3)	Relevant paragraph(s) within Method Statement addressing this
We advise that an over-arching strategy and approach to licensing the various Net World Sports developments at Wrexham Industrial Estate is considered. We would advocate that a new licence application is submitted that includes all land in plan number G9134.42A where planning consents have been approved and any ecological reserved conditions discharged. Each new planning application will need to request the revocation (relinquishment) of any previous extant licence and all conditions and obligations required under the extant licence transferred to the new licence amendment.	This change has not been made at this stage but may be considered after approval of the planning application
Sections A5 and B.1.13 refer to “Conservation of Habitats and Species Regulations 2010”, these sections should be updated to refer to the “Conservation of Habitats and Species Regulations 2017 (as amended)”.	Paragraphs A.5 and B.1.13
Section A.2 states the development area is approximately 37.21ha whereas section E.3.2.2 states that the total development area is 36.35ha. Clarification on the hectarage should be provided.	Paragraphs A.2 and E.3.2.1
Section C.6.2 contains details regarding surveys carried out and references to ‘Pond ID’ which does not correlate with national databases. We advise that the pond identification codes are updated to correctly correspond with the referencing system used by Cofnod / Wales GCN monitoring scheme for accurate and consistent cross referencing.	This change has not been made.
The document list under section E.2.4.1 should be updated with dates and version numbers of drawings and plans included/referenced within the EPS Development Licence Method Statement. The list should also be updated to include the GCN specific provisions referenced above once available.	Paragraph E.2.4.1
In relation to section F, in our view different approaches regarding tenure will be required in respect of on-site and off-site land. The rationale for this is that the onsite scheme is multifunctional whereas the offsite areas are for nature conservation purpose only. As previously advised, the long-term occupier(s) of the off-site ecology areas will need to accord with the definition of a responsible body under Part 7 of the Environment Act 2021. This body must be appointed and occupying one or more of the off-site ecology areas before the commencement of the operational phase of the proposals.	This change has not been made.
The long-term funding will need to be confirmed within the provisions of any future licence application. We note and concur with the approach described in section F.1.3 that estate management charges will be levied on all future occupiers to provide long-term site management, monitoring and wardening throughout the operational phase of the proposals.	No change required.

Section F.2 - in line with comments regarding section 4.2 of the HMP below, we advise that owing to the importance of the Wrexham Industrial Estate GCN population, 25 years is too short a duration, therefore surveillance will be necessary for a duration of a minimum 25-year management period.	Paragraph F.2.1.
We note the timetable of works in section G and advise that the following additional activity is included within the table: • Transfer of occupancy of one or more ecology areas before commencement of the operational phase of the proposals	This change has not been made.
We note that section H.2.1 states “All land used for GCN mitigation will remain under the ownership and management of the developer Net World post completion. An appropriate ecological consultants with GCN licences will be employed to support the developer owner”. We continue to advise that the occupancy of off-site ecology areas is transferred to a body that accords with the definition of a responsible body under part 7 of the Environment Act 2021. Furthermore, our comments only relate to the detail of this specific development as opposed to being applicable to any other land including proposed offsite compensation (receptor) areas	This change has not been made.
Annex K.2 contains the drawing ‘Great Crested Newt Survey Results’ reference G9134.034A. The drawing shows an area highlighted as the “Application Boundary”, however this does not match the red-line application boundary for this application P/2023/0497. We advise that the drawing is updated to reflect the correct red-line application boundary.	Paragraphs C.6.1, C.6.2, E.2.4.1 and Annex K.2