Robinwood Activity Centre, Maes y Nant

Bangor Rd, Marchwiel, Wrexham LL13 0TF

Preliminary Ecological Appraisal

14th April 2025



Produced by Wildbanks Conservation

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REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

Report Version	Date	Completed by:	Date	Approved by:
Final	14/04/2026	Tanya Cobb	14/04/26	Mick Smith

The information we have prepared is true and we confirm that the opinions expressed are our true and professional bona fide opinions.

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C O N T E N T S:

1.0 Introduction

2.0 Site Description

3.0 Survey Methodology

4.0 Baseline Conditions

5.0 Appraisal of Potential Effects

6.0 Discussion and Recommendations

7.0 References

APPENDICES

A1 Site Photographs – plates 1-12

A2 Legislation and Planning Policy

1.0 INTRODUCTION

1.1 This report has been prepared on behalf of Robinwood Activity Centre and provides the results of a Preliminary Ecological Appraisal (PEA) and protected species surveys undertaken on 1st April 2026. The PEA considers the potential ecological constraints associated with building a new detached meeting room within Robinwood Activity Centre, Maes y Nant, Bangor Rd, Marchwiel, Wrexham LL13 0TF (approximate OS Grid Ref: SJ 37402 46965).

1.2 The aim of the PEA was to provide sufficient ecological information to:

- Provide baseline information on the current habitats and ecological features both on-site and in the immediate surrounding area;
- Identify the presence of any protected species or habitats that could support protected species and provide an appraisal of any potential effects that the proposed development may have on these;
- Provide recommendations for further pre-construction survey work and/or mitigation measures, if required;
- Provide recommendations for habitat enhancements to obtain a net gain in biodiversity.

1.3 The redline boundary of the proposed development site consists of an area of hardstanding, shrubs (i.e. ornamental and native) and immature tree, and is defined on Figure 1. The proposed new building will occupy all of the redline boundary footprint, therefore, all of the land within the redline boundary will be affected by the proposed development. For the purpose of this Report the land within the redline boundary is hereto referred to as "the Site". The wider area around the Site, within the ownership of the Robinwood Activity Centre has also been considered during this PEA and is marked with a blue line boundary on Figure 1.

1.4 Protected species surveys included Ground Level Tree Assessment (GLTA) of mature trees within the Site, and immediately adjacent. The results of this have been combined within this Report.

2.0 SITE DESCRIPTION

2.1 The site is located within Robinwood Activity Centre, which is approximately 5 km south-east of Wrexham city. The Activity Centre is regularly visited by 100s of 7-11 children on residential trips and therefore, receives a lot of human disturbance year-round. The Activity Centre was developed in 2016, from a former hotel, at which time an Ecological Appraisal dated 27/07/2016 was produced by Envirotech NW Ltd for the change of use and redesign to an Activity Centre. A follow-up Ecological Constraints Survey Report by RML Ltd was prepared on 12/12/2022 to support a subsequent planning application to construct a new shower block, meeting room and luggage storage sheds, however, this was withdrawn. Both the 2016 Appraisal and the 2022 Report identified Great

Crested Newts (GCN), a badger sett and birds to be the greatest constraints within the wider Robinwood Activity Centre land. A GCN EPS Mitigation Licence was obtained from Natural Resources Wales (NRW) in 2017 whilst converting the former hotel into an activity centre, in relation to a small population of GCN (<10 individuals) within the activity centre land. This EPS Mitigation Licence expired in May 2018.

2.2 A bat EPS Mitigation Licence dated 20/12/2022 is currently in place until 30/11/2026 in relation to disturbance/destruction of a breeding site or resting place of Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Brown Long Eared (*Plecotus auritus*) and Brandt's (*Myotis brandtii*) bats whilst conserving and repairing the roof structure of the former hotel building, ~20m from the Site.

2.3 The Robinwood Activity Centre comprises of hard standing, buildings, three ponds, amenity grassland, semi-improved grassland, scrub and mixed woodland. The wider landscape includes mostly pasture and arable farmland, scattered broadleaf woodland and urban areas, e.g. residential and industrial.

2.4 The immediate habitat surrounding the site is therefore, considered to have potential for a wide variety of protected species e.g., bats, badgers *Meles meles,* great crested newts *Triturus cristatus,* reptiles and birds all of which will be addressed further in this Report.



Figure 1. Aerial map showing development boundary outlined red and wider landownership boundary, Robinwood Activity Centre, outlined blue. (Imagery ©2026 Airbus, Bluesky, Infoterra Ltd & COWI A/S, Maxar Technologies, Map data ©2026)

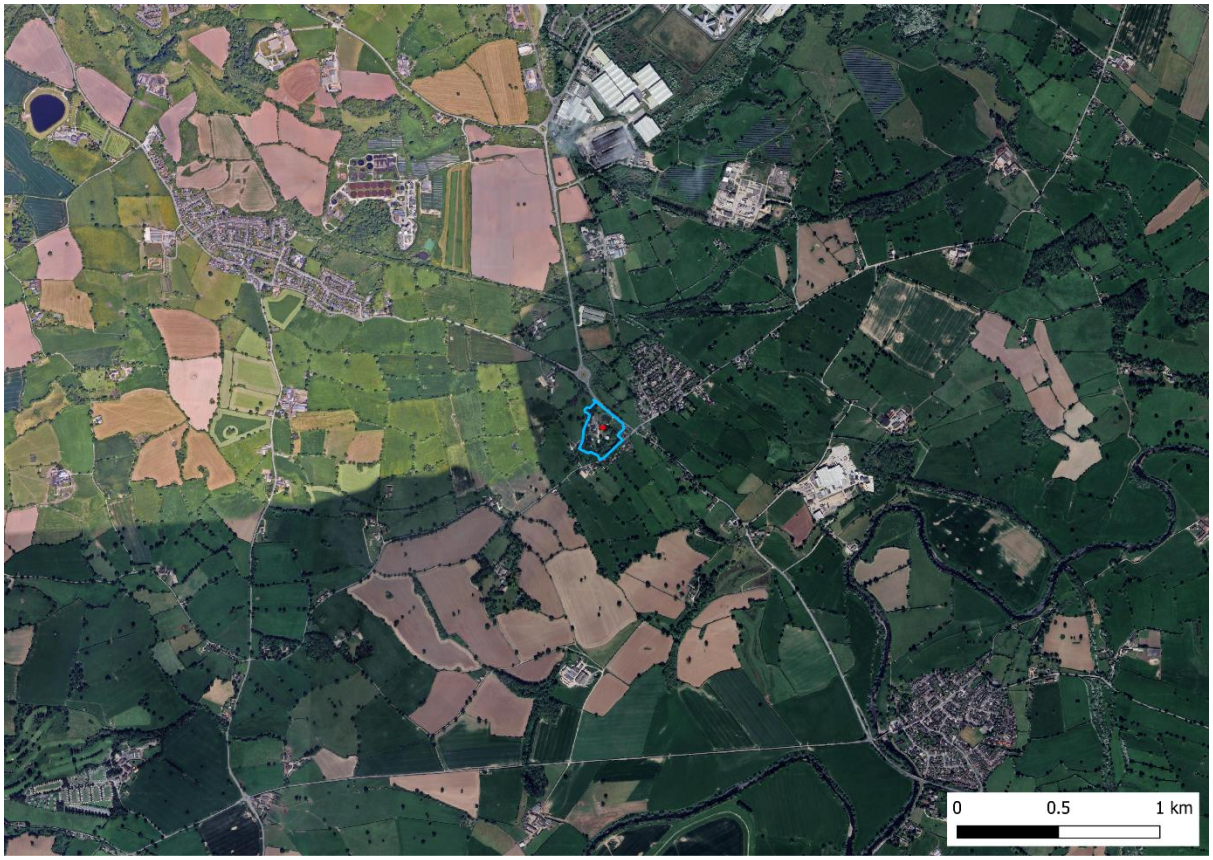


Figure 2. Aerial map showing Robinwood Activity Centre boundary outlined blue and wider landscape. (Imagery ©2026 Airbus, Bluesky, Infoterra Ltd & COWI A/S, Landsat / Copernicus, Maxar Technologies, Map data ©2026 Google)

3.0 SURVEY METHODOLOGY

3.1 To inform this Preliminary Ecological Appraisal, a desk-top study and field survey were undertaken in line with Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017).

3.2 **Desk Top Study**

3.2.1 A desk top study was undertaken by Wildbanks Conservation Ltd. Protected species records within a 1km radius of the site were obtained from Local Environmental Records Centre for North Wales (COFNOD). The following other online resources were also used for background information of the Site.

- MAGIC website
- Ordnance Survey maps

- Aerial photographs

3.3 **Field Survey**

3.3.1 The purpose of the field survey was to identify and assess the following:

- the habitats present;
- the potential for legally protected species to be present;
- any potential constraints to the development;
- the presence of invasive plants and animals; and
- to provide recommendations for ecological enhancements.

3.3.2 The Field Survey was undertaken by Jack Halpin BSc ACIEEM & Tanya Cobb BSc, Team Leader and Assistant Ecologist, Wildbanks Conservation, on 1st April 2026.

3.4 **UK Habs survey**

3.4.1 A UK Habitat Classification (UK Habs) survey was undertaken on the Site by Jack Halpin, 8 years' experience, and Tanya Cobb, 3 years' experience of ecological surveys, Preliminary Ecological Appraisals and Ecological Impact Assessment, on 1st April 2026.

3.4.2 Habitat types were mapped according to the dominant vegetation communities noted within each habitat parcel or feature, in accordance with the UK Habitat Classification User Manual (2023).

3.5 **Protected Species**

3.5.1 The Site was searched for evidence of, or features/habitat that could be used by protected species such as bats, badgers, great crested newts (GCN), reptiles and nesting birds.

3.5.2 Where evidence, or suitable habitat, for any of the aforementioned protected species was identified, a more in-depth species-specific survey was carried out, if possible, in accordance with recognised guidelines for that species/habitat, or such surveys have been recommended to be carried out.

3.5.3 Consideration was also given to the Site and wider land being suitable for water vole *Arvicola amphibius* and otters *Lutra lutra*. There are no watercourses, ponds, ditches, wet features or habitats suitable for foraging/resting within the Site for water vole or otter. The Site is located 20m south of pond P1 which does provide a suitable aquatic habitat for water vole and otter, however, this pond is isolated from watercourses with known otter/water vole populations by busy, main roads and is subject to a heavy amount of human disturbance, which limits water vole/otter access to the wider landownership boundary. Due to the lack of suitable habitat for these species within the development boundary, its isolation from other suitable habitat in the wider landscape and the negligible impact

of the development on habitat suitable for water vole and otter from this point on they are considered to be unaffected by the development and therefore, will not be considered further in this report.

3.5.4 *Bats*

3.5.4.1 All buildings/structures/trees within the Site were assessed for their potential to host roosting bats in line with Bat Survey Guidelines (Collins, 2023). Due to the proximity of the existing "Lodge" building to the Site (Figure 3), ~5m, the northern aspect of this building, which directly faces the proposed development site, as well as the eastern and western aspects of the building, was also assessed for potential bat roost features.

3.5.4.2 The exterior of all aspects of any buildings were visually assessed for Potential Roost Features (PRFs), potential access points and evidence of bat activity. With the aid of binoculars and endoscopes, features such as gaps in brickwork, small gaps under barge/soffit/fascia boards, raised or missing roof/ridge tiles or gaps at gable ends, which have the potential for use as roosts/access points, were sought. Evidence that bats actively used these PRFs/access points would include staining within the gaps, or bat droppings or urine staining under gaps; a note being made wherever these were present. The presence of cobwebs and/or general detritus within and around PRFs was used as an indicator that bats had not recently used the area to access the building. Following the external assessment, an internal assessment of the building was undertaken, searching for the same evidence, where necessary.

Ground Level Tree Assessment

3.5.4.3 Trees within, and immediately bordering, the development site were noted and recommendations for further surveys provided if required. Where possible, a Ground Level Tree Assessment (GLTA) was conducted on trees that are to be affected by the proposed works i.e. due to felling or pruning.

3.5.4.4 Assessment undertaken on trees included using ladders, binoculars, high-lumen torches, inspection mirrors and endoscopes, where possible. Features such as rot holes, hazard beams, woodpecker holes, lifted bark, vertical cracks, dense ivy, or callus formations were recorded and evaluated. Trees were then classified according to bat roost potential as follows:

- Negligible – No suitable PRF observed.
- PRF-I (Individual use) – Small, isolated PRF suitable for single or small numbers of bats.
- PRF-M (Multiple bats) – Larger, more sheltered features potentially suitable for group or maternity roosts.

3.5.4.5 Any direct evidence of bat use—such as droppings, staining, feeding remains, or live bats—was noted. Conversely, the presence of dense cobwebs or detritus obstructing PRF entrances was used to infer likely absence of recent use.

3.5.4.6 Consideration was also given to wider bat habitat requirements including flight paths and foraging opportunities.

3.5.5 *Badger*

3.5.5.1 An assessment was made of the habitats present on the Site for their suitability for use by badgers. The level of badger activity was assessed using any evidence of recent soil disturbance and/or tracks around sett entrance holes, mammal tracks and the presence/absence of any foraging sites or latrines on the Site.

3.5.6 *Great Crested Newt*

3.5.6.1 An assessment was made of the habitats present on the Site for their suitability for use by great crested newts (GCN), taking into account presence of waterbodies, connectivity, or hibernating opportunities, as per survey guidelines (Langton, 2001).

3.5.6.2 Any waterbodies identified on, or adjacent, to the Site, were assessed for their potential to support great crested newts using the Great Crested Newt Habitat Suitability Index (ARG UK, 2010). When waterbody related factors are inputted into the HSI, a number between 0 & 1 is outputted, where 0 indicates unsuitable habitat and 1 represents optimal habitat, which relates directly to a scale of suitability for GCN. The HSI score is then used to score the suitability of the pond on a categorical scale (Table 1).

Table 1. Habitat Suitability Index Scoring

HSI Score	Pond Suitability
< 0.5	Poor
0.5 – 0.59	Below average
0.6 – 0.69	Average
0.7 – 0.79	Good
> 0.8	Excellent

3.5.7 *Reptiles*

3.5.7.1 An assessment was made of the habitats present on site for their suitability for use by reptiles, based on the criteria outlined in the Herpetofauna Workers' Manual (Gent, 2003). This habitat-based

approach evaluates the site's capacity to support a population by identifying key life-cycle requirements, specifically:

- **Vegetation Structure:** Assessing diversity of vegetation structure to provide both open areas for thermoregulation and dense cover for predator avoidance.
- **Basking Opportunities:** Identifying south-facing aspects, bare ground, or log piles that receive high levels of sunlight.
- **Foraging and Prey Availability:** Evaluating the presence of invertebrate or small mammal populations to support specific reptile species.
- **Hibernation and Egg-laying Potential:** Searching for "hibernacula", e.g., stone walls, root balls, or mammal burrows, and suitable egg-laying media such as decomposing vegetation or compost heaps.
- **Connectivity:** Determining the site's role as a biological corridor or buffer to local protected habitats.

3.5.7.2 Sightings of individuals were also recorded during the survey, if encountered; however, the primary assessment focused on the potential of habitats to support these species in accordance with standardised habitat evaluation.

3.5.8 *Birds*

3.5.8.1 During the Site field survey, trees, buildings and other structures were examined for suitable bird nesting locations.

3.6 **Survey Limitations**

3.6.1 It is considered that there are no significant limitations that would reduce the veracity of the conclusions or recommendations detailed within this Appraisal.

4.0 BASELINE CONDITIONS

4.1 Desk Top Study

4.1.1 A data request was submitted to Local Environmental Records Centre for North Wales (COFNOD) for known records of protected species within 1km of the Site. Alongside a range of listed plant, invertebrate and bird species, a number of EU protected species records were returned. These include:

- **85 records for Great Crested Newts** including within ponds P1, P2 and P3 within Robinwood Activity Centre land between 2000 and 2023. Other records include surveys results undertaken across Wrexham Industrial Estate which has a known GCN population assemblage. GCN presence has been recorded throughout the 1km radius around the Site since 1991 until 2025.

- **12 records for bats** including Common pipistrelle (*Pipistrellus pipistrellus*), Brown long-eared bat (*Plecotus auritus*), Whiskered bat (*Myotis mystacinus*), Brandt's bat (*Myotis brandtii*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Myotis Bat species & Pipistrelle bat species.

  The closest records are from the former hotel building within the wider landownership boundary, during nocturnal bat surveys conducted in 2017. Common pipistrelle, Brown long-eared bats, Soprano Pipistrelle, Myotis Bat species & Pipistrelle bat species were recorded emerging from/entering the building over the course of the surveys and Brown long-eared bat and Brandt's bat droppings were found in the loft space.

  The most recent records are from 2024 of a roost of Common pipistrelle and Whiskered bats located 844m from the Site.

- [redacted]

- **1 record for otter:** which consisted of an otter spraint 105m from the Site in 2014.

- **2 records for water vole:** located 255m and 469m from the Site, both recorded in 2000. No context for these records was provided within the data search results; therefore, it is not known whether these records represent live water vole sightings or evidence of water vole.

- **1 record for reptiles**: which consisted of a Grass Snake *Natrix natrix* 689m from Site in 2013.

- **16 records of Schedule 1 birds** including Barn Owl, Green Sandpiper, Redwing, Fieldfare, Kingfisher. The closest record is, 278m from Site, of a Barn owl in 2020 from a local recorder. Majority of these records are recorded to monad level i.e. SJ3746 and therefore, provide limited context to the Site. However, given the variety of habitat found on site, it is possible that these species do traverse the landscape around, and possibly through, the Site, and this will be taken into consideration within the conclusions of this Appraisal.

- **46 records for species protected under Section 7 of the Environmental (Wales) Act 2016** (excluding records for species already referred to above): Black-headed Gull (1), Bullfinch (1), Common Toad (8), Curlew (1), Dunnock (6), Hedgehog (6), House Sparrow (6), Kestrel (2), Lapwing (2), Marsh Tit (1), Song Thrush (5), Spotted Flycatcher (1), Starling (4), Willow Tit (1). Although these results do not impact the proposed development, this information can be used to inform compensation and enhancement recommendations to conserve and uplift local populations of species of principal importance for enhancing biodiversity.

4.1.2 One statutory designated site is located within 2km of the Site.

- **River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (Wales) SSSI & SAC**

  The River Dee is designated for its fluvial geomorphology, Carboniferous geology, range of river habitat types, saltmarsh transition habitats, populations of otter, salmon *Salmo salar*, lamprey sp. and aquatic invertebrates (NRW, 2024). This SSSI/SAC is located 1.5km the Site and is not connected by any watercourse to the Site.

4.1.3 No local, non-statutory designated sites exist within 2km of the Site.

4.2 Field survey

4.2.1 The Site is 120m² and comprises of hardstanding (40m2) and scrub (80m2), dominated by ornamental shrubs such as Common box, Japanese spindle forsythia, but also Elder and Dogrose (Plate 1 and 2). One immature Horse chestnut tree (T3) is present within the site boundary. The ground cover consists of Ivy over predominantly bare ground, with occasional Bush and Common Vetch, Primrose, Bluebell, Ground elder and Nettle. The Site is bounded by hardstanding to the north, east and south, and the scrub continues to the west for ~10m before hardstanding.

4.3 UK Habs survey

4.3.1 The Site consists of predominantly hardstanding (UK Habs Level 4 code: u1b) and mixed, non-native scrub (UK Habs Level 4 code: h3h.200.523) (Figure 3).



Figure 3. Aerial map showing the baseline habitats identified during the UK Habs survey.

4.4 Protected Species Surveys

4.4.1 *Bats*

4.4.1.1 The habitats on Site, such as scrub and immature trees, do provide foraging opportunities for bats, however, these areas are small and are of lower quality than other habitats within the wider landownership boundary, i.e. woodland, ponds and hedgerows. This habitat surrounding the Site, provides excellent foraging and commuting habitat for bats. No roosting opportunities exist within the scrub and immature tree within the Site.

4.4.1.2 No buildings are present on site; however, the existing Lodge building (Figure 4; Plate 3) is in close proximity to the Site, 5m to the south, and has potential roost features within its northern aspect, facing the Site. The Lodge is a brick built, two-storey building with a pitched, tiled roof. The building is currently in use as offices and canteen for site staff. The northern aspect of the Lodge is in good condition, however, what appears to be a very prominent bat access point (Plate 5) into the loft is present. Upon inspection of the loft (Plate 4), no evidence of bat use was found, and two identical potential bat access points have been installed across from each other; one on the northern roof pitch and one on the south. These access points are letterbox style openings in the roof, approximately 250mm x 100mm. The roof also has two Velux windows present. These access points and Velux

windows allow a lot of light ingress into the loft space and provide a through route for wind making the loft space cold, draughty and very light. The loft is boarded and no access to roosting features exists, such as timberwork or the underside of roof tiles. The loft space, therefore, has low suitability for a bat roost.

4.4.1.3 The roof of the Lodge is in good condition; however, one area of the tiles has become dislodged creating bat access under the tiles on the eastern end of the building (Plate 5). A potential roost feature exists within the western end of the building; an overhanging roof has been installed post-construction of the original building and a gap above this overhanging roof leading to the soffit area is present, suitable for crevice dwelling species, such as Pipistrelles (Plate 6). No other PRF's exist on the northern, eastern or western elevations. The Lodge, taking into account only the northern, eastern and western aspects of the building, is **categorised as having low potential for roosting bats**.

Ground Level Tree Assessment

4.4.1.4 At the time of this Appraisal, one tree (T3; Plate 7) is due to be felled and one tree (T2) may require pruning or felling as part of the proposed works. A Ground Level Tree Assessment was undertaken on three trees, and none were identified as having features suitable for roosting bats (Figure 4).



Figure 4. Aerial map showing buildings and trees assessed for potential roost features across the Site.

4.4.2.1 [redacted]

4.4.2.2 [redacted]

4.4.3 *Great Crested Newts*

4.4.3.1 No waterbodies were identified within the redline boundary. Three waterbodies (Pond P1, P2 and P3; Figure 5) exist within the wider landownership boundary all with confirmed GCN presence. These three ponds are surveyed annually by Amphibian and Reptile Conservation Trust since 2023 to provide long-term population monitoring of GCN within Wrexham Industrial Estate, which has an important meta population of GCN and wider amphibian assemblage (ARC, 2025).

4.4.3.2 Pond P1: Large waterbody (approximately 1,550m2), 20m north of the Site and currently used for water activities such as canoeing (Plate 8). 70% of the banks are dominated by Typha with other marginal plants including Brooklime, Marsh marigold and Soft rush. Following ARC population surveys in 2025 and 2024 (ARC, 2025 & ARC, 2024), a peak count of 62 GCN was recorded within pond P1 in 2025 and a peak count of 86 in 2024. GCN populations are classed into population size; small: 1-11 individuals, medium: 11-100, large: 100+ (Langton, 2001), therefore, this pond has a medium sized, breeding population of GCN. A GCN egg was also recorded during the field survey, confirmed that the pond remains a breeding pond for GCN in 2026 (Plate 9).

4.4.3.3 Pond P2: Pond located 100m northwest of the Site and approximately 150m2 (Plate 10). Pond located amongst mature trees, which completely shade out the pond. No GCN were recorded in this pond during the 2025 and 2024 ARC population surveys.

4.4.3.4 Pond P3: Pond located 125m south of the Site and approximately 320m2 (Plate 11). Pond located amongst mature trees, which completely shade out the pond. No GCN were recorded in this pond during the 2025 and 2024 ARC population surveys.

4.4.3.5 During the 2025 ARC population surveys, each pond received a HSI score as found in Table 2 below (ARC, 2025). The pond number in brackets is the ARC pond reference number and included in this Report for ease of reference between documents.

Table 2. Habitat Suitability Index Scoring

Pond Number	HSI Score	Pond Suitability
Pond P1 (S021)	0.88	Excellent
Pond P2 (S020)	0.77	Good
Pond P3 (S022)	0.69	Average

4.4.3.6 The hardstanding and areas of bare ground with some vegetation cover under the scrub within the Site does not provide good quality foraging and hibernation habitat for GCN and therefore, GCN are unlikely to occur within the redline boundary of the Site. However, GCN have unrestricted access to the Site from the breeding ponds. Excellent foraging, resting and hibernation habitat within the wider landownership boundary exists and as such GCN being present within the Site cannot be ruled out therefore, a precautionary approach should be taken with regards to GCN.

[redacted]

4.4.4 *Reptiles*

4.4.4.1 The hardstanding and areas of sparse, shaded ground cover within the Site does not provide good opportunities for reptiles to bask and take shelter. The Site is isolated from suitable reptile habitat

within the wider landownership boundary by substantial areas of hardstanding and the amount of foot traffic and human disturbance around the Site will deter reptile use of the Site.

4.4.4.2 No direct evidence of reptiles was recorded. However, it is acknowledged that reptiles may be very difficult to find during a walkover survey. Despite this, the Site is considered to have negligible potential for reptile use.

4.4.5 *Birds*

4.4.5.1 Opportunities for nesting birds exist around the Site within the mixed scrub (suitable for species such as thrushes and wrens *Troglodytes troglodytes*) and trees (suitable for species such as pigeons, tits and finches). Due to proximity of the proposed development to this potential bird nesting habitat, a precautionary approach should be taken with regards to nesting birds.

4.5 *Other mammals*

4.5.1 The data search provided a record for otter (105m) and 2 records for water vole (255m and 469m), however, as stated paragraph 3.5.3, no habitats suitable for water vole or otter exists within the Site. The Site is located 20m south of pond P1 which does provide a suitable aquatic habitat for water vole or otter, however, no connecting habitat/watercourse between pond P1 and the location of the water vole/otter records exists. Robinwood Activity Centre land is isolated from watercourses with known otter/water vole populations by busy, main roads and is subject to a heavy amount of human disturbance, which limits water vole/otter access to Activity Centre land. Due to the lack of suitable habitat for these species within the development boundary and the negligible impact of the development on the wider habitat, water vole and otter do not pose a constraint on the proposed development and no recommendations for further survey work or mitigation are required.

5.0 APPRAISAL OF POTENTIAL EFFECTS

5.1 This section provides an appraisal of potential effects of the outlined proposals on protected habitats and species. The proposals comprise building a new single-storey, detached meeting room on an area of predominantly hardstanding and ornamental scrub. This will require felling of at least one immature tree, the removal of ground vegetation, soil stripping and levelling ground, as well as associated drainage, and landscaping work.

5.2 *Designated Sites*

5.2.1 The proximity of the designated sites has been considered. One designated site lies within 2 km of the Site: River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (Wales) SSSI & SAC, however, this is 1.5km from the Site with no connecting watercourse to the Site. The proposed works will not result in the loss of, or damage to, any habitat that supports the SSSI/SAC. There will be no direct impacts through access, disturbance, or changes to drainage as the proposed works are small scale.

5.3 *Habitats*

5.3.1 Habitat loss is limited to areas of low conservation status habitats primarily consisting of hardstanding, and ornamental/non-native scrub. Its recovery post construction should be seen as an opportunity for enhancement by increasing the quality of habitats within the wider landownership boundary which will aim to provide an increase in biodiversity.

5.4 At least one tree (T3) will need to be felled within the redline boundary for the development to take place. This tree is an immature Horse Chestnut tree of low ecological value, lacking features such as cavities, deadwood, or dense canopy structure that would support roosting bats, nesting birds, or other notable species.

5.5 *Bats*

5.5.1 No buildings are located on Site. The Lodge building is in close proximity to the Site (5m) and its northern (elevation facing the Site), eastern and western aspects have been categorised as having low potential for roosting bats with three PRF's identified. The Lodge is occupied and receives regular foot traffic throughout the day, so any bats roosting within the building will be acclimatised to human disturbance. The amount of noise disturbance during and post-construction will likely be comparable to the current level of disturbance on Site, and within the wider Activity Centre, through day-to-day activities. The Activity Centre can support up to a 100 children and large numbers of staff in a given day, and these individuals are moving around the Site and the Activity Centre throughout the day. During construction, dust and vibration disturbance around the Site may increase through the use of

construction machinery, however, this disturbance will be temporary, and no dust and vibration disturbance is anticipated post-construction.

5.5.2 The proposed works includes building a new single-storey meeting room which has minimal potential to change the immediate landscape of trees/scrub that bats roosting within the Lodge could be utilising to navigate out and away from their roost. The single-storey nature of the new building means that the building is of a similar height and dimensions of the current scrub habitat on Site, so flightlines to the Lodge by any emerging/entering bats will be minimally affected. The landscape and habitat immediately surrounding the Site will not be affected during or post- construction, therefore, landmark trees and hedgerows, in close proximity to the Lodge (~10-20m from the Lodge), will remain intact post-development for bats to continue to use. It is acknowledged that the 2023 Bat Survey Guidelines recommend that for buildings categorised as having low roosting potential for bats, a single emergence survey should be carried out to determine likely absence of bats. Due to the reasons aforementioned which culminate into any roosts within the Lodge will likely not be affected by the proposed works, nocturnal surveys of this building are not required. However, a precautionary approach to working methods should be implemented during the works.

5.5.3 One tree (T3) is due to be felled as part of the proposed works; however, this tree was categorised as having negligible potential for roosting bats. The proposed works are, therefore, not likely to impact any roosting bats within the proposed development boundary. Trees in close proximity to the Site (T1 and T2) were also categorised as having negligible potential for bats, therefore, any felling/pruning works required to these two trees will not impact any roosting bats. Any noise, dust, or vibration disturbance to potential roosting bats within these perimeter trees, will be comparable to current levels of human noise disturbance on Site or will be temporary, as stated in paragraph 5.5.2 above.

5.5.4 Due to the presence of limited, low quality bat foraging habitat i.e. non-native scrub, and high level of human activity currently on Site, as well as the availability of higher quality foraging habitat in the wider landownership boundary, bats are unlikely to be effected by the loss of this small area of foraging resource and the development will not impact the wider foraging availability.

5.5.5 Lighting on the new development will likely mirror that currently found across the Activity Centre, however, given the potential for bats to be using the Site and perimeter habitats and trees, sympathetic lighting to avoid disturbing bats should be considered as detailed in Section 6 below.

5.6 [redacted]

[redacted]

[redacted]

5.7 *Great Crested Newt*

5.7.1 Habitats on Site do not provide good quality habitat for foraging GCN as ground vegetation cover is minimal and substantial bare ground is present; however, it is possible for GCN to forage and shelter amongst the leaf litter and ground ivy as well as amongst tree roots. Due to the medium sized GCN population within pond P1, 20m north of the Site, it is possible for GCN from this pond to access the Site for occasional foraging or shelter. The Site is completely isolated and surrounded by at least 2m of hardstanding is every direction, which means that low quality commuting habitat connects the Site to pond P1 and the likelihood of GCN being present within the Site is reduced, however the presence of GCN onsite cannot be ruled out and individuals could be injured or killed by the proposed development if present at the time of construction.

5.7.2 The proposed development will not impact ponds P1, P2 or P3, which will all remain present post-construction, and habitat loss on Site will be unlikely to affect the local GCN population. No GCN surveys are recommended, as data provided by Robinwood Activity Centre provides the results of population surveys in 2024 and 2025 (ARC, 2024 & 2025). These surveys have been conducted within the most recent optimal season, and the results remain valid and up to date. Precautionary working methods should be implemented to ensure legal compliance, given the presence of GCN within 20m of the Site.

5.8 *Reptiles*

5.8.1 The Site has negligible potential for reptile use due to its unsuitable shady habitat, isolation from more suitable habitat in the wider landownership boundary and level of human disturbance. It is considered likely that reptiles are absent from the Site and no suitable reptile habitat will be lost during the proposed works, as such, direct impacts on reptiles are expected to be negligible and development mitigation for reptiles is not required.

5.9 *Birds*

5.9.1 The scrub and trees on Site does provide possible nesting opportunities, however, given the small scale of the proposed works and the numerous nesting opportunities in close proximity to the Site,

in the wider landownership boundary, any nesting habitat loss onsite will have a low impact on local nesting bird populations. If the proposed development, including tree felling and vegetation removal, is to commence during the nesting bird season (March-August inclusive), there is potential for nesting birds to be disturbed and nests to be destroyed during the process. Precautionary working methods should be implemented to ensure legal compliance in regard to nesting birds.

5.9.2 Records for the following Schedule 1 bird species were provided in the data search; Barn Owl, Green Sandpiper, Redwing, Fieldfare and Kingfisher. Redwing and Fieldfare are winter migrants and therefore, do not breed in the UK. The remaining species are not associated with scrub habitats such as those found on Site and are unlikely to utilise the Site for nesting, foraging/hunting or shelter, therefore, the proposed development will likely not affect the local populations of these Schedule 1 species.

6.0 DISCUSSION AND RECOMMENDATIONS

6.1 The proposed development site at Robinwood Activity Centre has been subject to a Preliminary Ecological Appraisal (PEA), which consists of a Desk Top Survey and a Field Survey conducted on 1st April 2026. As part of the Field Survey, a site walk-over, and Ground Level Tree Assessment (GLTA) was also undertaken.

6.2 The Site was searched for evidence, or habitat that could potentially be used by protected species: bats, badgers, great crested newts, reptiles and nesting birds. No evidence of activity from any of these protected species was found on Site, however, the Site is in close proximity (20m) to a known GCN breeding pond with a medium sized population confirmed during surveys in 2024 and 2025. A GCN egg was recorded within this pond (P1) during the Field Survey. Mitigation will be required for GCN within the proposed development plans.

6.3 [redacted]

6.4 The Site has negligible potential for reptiles, water vole and otter due to the level of human disturbance and lack of suitable habitats found on Site.

6.5 Survey Recommendations

6.5.1 No further surveys are recommended in relation to any protected species and the proposed development.

6.6 Mitigation Recommendations and Enhancements

6.6.1 The following mitigation measures and recommendations are proposed to address the potential effects identified in Section 5 and to ensure that any risks identified are avoided, minimised, or appropriately managed.

Habitats

Recommendation 1

6.6.2 All external lighting must be designed and installed in strict accordance with ILP Guidance Note 08/23: Bats and Artificial Lighting at Night (ILP, 2023) to ensure that potential impacts on all biodiversity across the Site are avoided or minimised.

Recommendation 2

6.6.3 New scrub planting detailed in paragraph 6.6.12, implemented for GCN habitat improvements within the wider Activity Centre land, will also replace the scrub habitat lost on Site through the proposed works. The scrub planting will improve upon the scrub habitat lost on Site, through replacing ornamental, non-native plants with an area of native scrub trees suitable for a wide range of species.

Bats

Recommendation 1

6.6.4 The proposed works are small scale and any bats roosting within the Lodge will be negligibly affected by the proposed works; therefore, nocturnal surveys of this building are not required. By producing and following a Reasonable Avoidance Method Statement and mitigation measures, it is considered that the risk of direct and indirect impacts on bats will be reduced to minimal levels.

6.6.5 *Summarised Reasonable Avoidance Measures - Bats*

- A suitable ecologist will be appointed to oversee the works
- Plans for external lighting has not been provided at the time of this Report, however, consideration is to be given to the commuting and dispersal routes used by bats. All external lighting should comply with Guidance document 08/23: Bats and Artificial Lighting at Night. Lighting that reduces vertical and horizontal light spillage should be used. In locations where light spill cannot be avoided, considerations should be given to timing, and temperature colour of lighting in order to reduce disturbance levels.
- Works should commence outside of the bat's peak activity season (May – September). If this is not possible, works will proceed with utmost caution with a licensed ecologist or accredited agent on site following the methodology set out in the RAMS.
- Prior to the commencement of works a toolbox talk will be provided to onsite personnel by a NRW licensed ecologist. The talk will include information regarding the protection of species, habitats, legal implications, their responsibilities and what to do if a protected species is encountered.

- Lighting during the construction period will not be switched on permanently throughout the night to avoid effects on foraging and commuting areas in the wider area of light sensitive species such as brown long eared bats.

- Heras fence with mesh lining is recommended around the construction zone, or between the Lodge and Site, to minimise dust and debris dispersal to potential bat roosts in close proximity to the Site. Warning signs should be added to this fencing to ensure it is not moved or taken down during the construction period.

- An exclusion zone of 10m from the Lodge building for loud machinery (*e.g.* Chippers) should be put in place to minimise noise and vibration disturbance to potential bat roosts within the Lodge building. Exclusion zone to be verbally agreed on site and monitored throughout works. If this is not possible, a licensed ecologist should be consulted and further surveys of the roost features within the Lodge should be undertaken to confirm impact of the development on bats.

- Any vehicles/construction machinery should be positioned so that exhaust fumes are directed away from potential roost features within the Lodge.

- If a bat, or any other animal, are found during works, works must stop immediately, and the site ecologist will be contacted, and advice sought: **Wildbanks Conservation; 01691 623505.**

- If construction works do not commence within 12 months of the date of this Report, a reassessment of the Lodge and trees within the Site should be carried out to ensure their potential roost category has not improved.

Recommendation 2

6.6.6 The scrub planting detailed in paragraph 6.6.12 will benefit bats through future roost provisions and providing foraging habitat.

Recommendation 3

6.6.7 No trees are to be lit during construction or throughout operation of the new premises. If trees are to be lit after sunset, then trees will be selected with no PRF's.

[redacted]

Great Crested Newts

Recommendation 1

6.6.9 Although the likelihood of GCN being present on Site is small, their presence cannot be ruled out. Without mitigation the risk to individual GCN increases but can be reduced to a low level with the implementation and strict adherence to a Method Statement. This will mean the risk of direct and indirect impacts on GCN will be reduced to minimal levels. **A European protected species (EPS) mitigation licence from Natural Resources Wales (NRW) is needed** to legitimise the destruction and disturbance to GCN.

6.6.10 The proposed Mitigation Strategy below (to be agreed by Local Authority and NRW) should be adhered to before and during construction works.

6.6.11 *GCN Mitigation Strategy*:

- No works will take place to the property that could affect GCN until the European Protected Species Mitigation License has been received.
- A suitable qualified ecologist will be appointed to oversee the works.
- Prior to the commencement of works, a toolbox talk will be provided to onsite personnel by a NRW licensed ecologist. The talk will include information regarding the protection of species, habitats, legal implications, their working methodologies and their responsibilities and what to do if a protected species is encountered.
- It will be proposed that due to the scale of development that trapping out the area will not be required and that vegetation clearance and excavation work should be overseen by a licensed ecologist or accredited agent.
- A designated receptor area will be identified for any individuals to be placed. This will be close to Pond 3 which is approximately 125m from the Site.
- Any excavations left uncovered overnight will be checked by suitably trained personnel prior to filling.
- Materials will be stored off the ground (e.g. on pallets) to reduce increasing the refuge opportunities for GCN within the Site.
- Currently no hibernation features exist within the Site, but if this changes before the proposed works are to take place, no works to features that provide hibernation potential will take place

between December and March (inclusive) or when temperatures are forecast to drop to below 5C over night for 3 consecutive nights.

Recommendation 2

6.6.12 The Site footprint is to be completely developed as part of the proposed work; therefore, new native scrub trees will be planted on ground that is currently amenity grassland in Robinwood Activity Centre land (Figure 6). The new scrub planting is in close proximity to the Site (20m) and will enhance the wider area for GCN. The proposed area is ~130m2 and should consist of 130 trees. The scrub planting will consist of the planting mix shown in Table 3, or similar depending on tree availability. Plants used will be of a minimum of 1 + 1 age (40-60cm) and planting will be carried out at a density of approximately one plant per metre, distributed in a randomised pattern to encourage structural diversity within the scrub. Each tree planted will be guarded using a "Bio-Earth Biodegradable Plastic-Free Tree Shelter Guard", wooden stakes and re-usable cable ties. These guards are plastic free and biodegradable, making them a more sustainable option that tradition plastic guard types.

Table 3. Scrub species planting mix.

Tree Species	Latin Name	Proportion (%)
Hawthorn	*Crataegus monogyna*	35
Hazel	*Corylus avellana*	20
Guelder rose	*Viburnum opulus*	15
Crab apple	*Malus sylvetris*	10
Rowan	*Sorbus aucuparia*	5
Wild cherry	*Prunus avium*	5
Holly	*Ilex aquifolium*	5
Wych elm	*Ulmus glabra*	5

6.6.13 Annual checks and replacement planting will be undertaken for three years to ensure establishment. Watering trees may be required on an ad-hoc basis depending on drought and environmental conditions.

Recommendation 3

6.6.14 The felled tree T3 and any scrub/vegetation cut on Site, as part of the proposed works, will be piled within the new scrub planting area to form a hibernaculum for GCN to hibernate or shelter within.

Birds

Recommendation 1

6.6.15 Vegetation/tree clearance or disturbance to any potential nesting features should be undertaken between October and March. Outside of this time a nesting bird survey will be undertaken by a qualified ecologist prior to any vegetation clearance/disturbance taking place. If nests are identified, the nests must remain intact and undisturbed until young have fledged. A cordon of 5-10m (depending on species) will be placed around the nest and works can continue outside this cordon.

Recommendation 2

6.6.16 A tree mounted Barn owl box will be installed within the wider landownership boundary. Exact location of Barn owl box to be agreed between the ecologist and the client, however, suggested location shown on Figure 6. Installation should be undertaken in accordance with the relevant manufacturer's guidance.

Recommendation 3

6.6.17 The scrub planting detailed in paragraph 6.6.12 will benefit birds through future nesting provisions and providing foraging habitat.

Compensatory Habitats

6.6.18 Planning Policy Wales (PPW12) requires development to provide a Net Benefit to Biodiversity (NBB), i.e. a better outcome than if the site would be left undeveloped. Wrexham County Borough Council have requested a Green Infrastructure Statement to reflect the NBB outcomes of the proposed works. This Statement has been prepared in conjunction with this Report and details the mitigation required for any loss of green infrastructure on Site and details proposed biodiversity enhancements to the Site in line with NBB. Loss of habitat on Site will be minimal and isolated to non-native scrub and a single immature tree.

Recommendation 1

6.6.19 As well as the scrub planting detailed in paragraph 6.6.12, a new hedge will be planted (50m) along the edge of the carpark within the wider Activity Centre land to provide a screen between the carpark and the GCN breeding pond and surrounding habitat. The hedge will also provide connecting habitat for GCN to shelter and forage, as well as enhance the Activity Centre for badgers and birds, and enhance biodiversity.

6.6.20 Hedge specification: The hedge will consist of the planting mix shown in Table 4. Plants used will be of a minimum of 1 + 1 age (40-60cm) and will be planted at a density of 9 per metre (Standard planting for a new hedge) in triple staggered row. Each tree planted will be guarded using a "**Bio-**

Earth Biodegradable Plastic-Free Tree Shelter Guard", wooden stakes and re-usable cable ties. These guards are plastic free and biodegradable, making them a more sustainable option that tradition plastic guard types.

Table 4. Hedge species planting mix.

Species	Common name	Proportion (%)
Corylus avellana	Hazel	35
Sambucus nigra	Elder	20
Sorbus aucuparia	Rowan	20
Viburnum opulus	Guelder rose	15
Euonymus europaeus	Spindle	10

6.6.21 Hedge management: The bottom of the hedge will be mulched with woodchip annually. This will suppress weed competition and retain moisture within the roots encouraging quick establishment. In severe drought conditions the hedge will be watered as required. A yearly check of the hedge will take place for 3 years. This check will include the replacement of any broken stakes or guards followed by replanting of any dead trees the following winter. The guards and stakes will be checked to ensure that they still stand upright and are stable in the ground. A 3m gap will be left within the hedge to allow access though it for maintenance to the grassland.

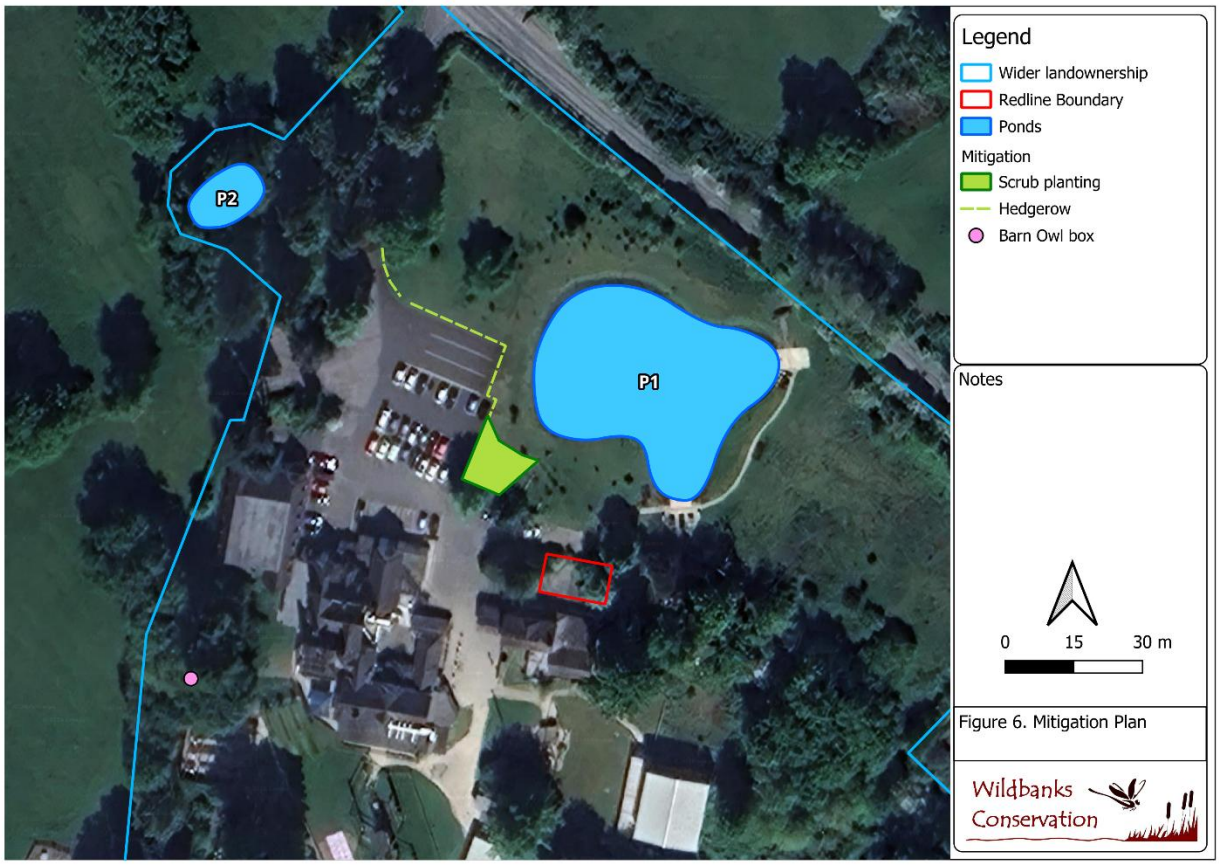


Figure 6. Mitigation plan for the proposed works.

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A1 APPENDIX – SITE PHOTOGRAPHS



Plate 1. Northern aspect of the Site.



Plate 2. Southern aspect of the Site.



Plate 3. The Lodge building located 5m south of the Site. The northern aspect of this building was assessed for potential bat roost features.



Plate 4. Loft within the Lodge, showing light ingress through bat access points.



Plate 5. Dislodged tiles (outlined red) providing PRF and bat access point into loft (outlined yellow).



Plate 6. Gap above this overhanging roof leading to the soffit area is present, suitable for crevice dwelling species.



Plate 7. Tree T3



Plate 8. Pond P1



Plate 9. GCN egg found during field survey.



Plate 10. Pond P2



Plate 11. Pond P3



Plate 12. Proposed hedgerow planting (green dashed line) and area of scrub planting (green area).

A2 APPENDIX - LEGISLATION AND PLANNING POLICY

A2.1 Many sites, animals and plants are protected by European and/or UK legislation either because of their decline across Europe and the UK or due to the persecution they have placed upon them by negligent or illegal acts such as baiting or trade. Legislation is also in place to prevent the spread of introduced or non-native invasive species and harmful weeds. When undertaking an appraisal of a proposed development, such legislation is taken into account as follows.

- European: Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive'); and Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds (codified version of Directive 79/409/EEC as amended) (the 'Birds Directive').

- UK (England & Wales): The Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitat Regulations') which transposes the Habitats Directive in UK law; The Wildlife and Countryside Act 1981 (as amended); the Countryside and Rights of Way Act (CRoW) 2000; the Protection of Badgers Act 1992; the Natural Environment and Rural Communities Act (NERC) (2006); Environment (Wales) Act 2016 and the Environmental Protection Act (EPA) 1990.

A2.2 Species such as otters, bats (all UK species), badgers and great crested newts are all protected in the UK under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended).

A2.3 It is an offence to damage or destroy a breeding site or resting place; intentionally or recklessly damage, destroy, or obstruct access to a place used for shelter or protection and to possess, advertise control, transport, sell, exchange or offer for sale/exchange any live or dead animal, or any part of one, listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended).

A2.4 Otters, all UK bat species and GCN are also referred to as European Protected Species (EPS) under the Conservation of Habitats and Species Regulations 2017.

A2.5 If work is proposed that would affect a European Protected Species, then a license from Natural Resources Wales (NRW) will be required. NRW, in exercise of the powers conferred under regulation 53(1) and 56(3) (a) of the Conservation of Habitats and Species Regulations 2017, may issue licenses for the following purposes:

- Preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;

- Preventing the spread of disease;
- Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property or to fisheries; to allow people to carry out activities which would otherwise be illegal.

A2.6 Before issuing a license under the Habitats Regulations, the licensing authority must be satisfied that "there is no satisfactory alternative" to the work as proposed and, that the proposed actions "will not be detrimental to the maintenance of the population of the species at a favourable conservation status (FCS)".

A2.7 To ensure EPS licensing requirements are met, the licensing authority must have enough information to complete an assessment of the application. This includes sufficient survey data so that how the Site is used by protected species is understood and impacts upon the protected species are appropriately assessed so that mitigation and/or compensation can be designed into the proposed development that will ensure that protected species' population can be incorporated and maintained in the long term.

Bats

A2.8 Seven bat species are UK BAP Priority Species. These are as follows:

- Barbastelle *Barbastella barbastellus*
- Bechstein's *Myotis bechsteinii*
- Brown long-eared *Plecotus auritus*
- Greater horseshoe *Rhinolophus ferrumequinum*
- Lesser horseshoe *Rhinolophus hipposideros*
- Common noctule *Nyctalus noctula*
- Soprano pipistrelle *Pipistrellus pygmaeus*

Badgers

A2.9 In addition to aforementioned legislation, as per the Protection of Badgers Act 1992, it is an offense to intentionally capture, kill or injure a badger, damage, destroy or block access to their setts, disturb badgers in setts, treat a badger cruelly, deliberately send or intentionally allow a dog into a sett or bait or dig for badgers. A badger sett includes the entrance holes, tunnels and chambers.

Hedgehog

A2.10 Hedgehogs are protected under Schedule 6 of the Wildlife and Countryside Act 1981 (as amended), which makes it illegal to kill or capture wild hedgehogs, with certain methods listed, and under the Wild Mammals Protection Act (1996), which prohibits cruel treatment of hedgehogs.

A2.11 Hedgehogs are considered a species of 'principal importance' under the Environment (Wales) Act 2016, which is meant to confer a 'duty of responsibility' to public bodies.

GCN

A2.12 In addition to aforementioned legislation, Great Crested Newts are also protected under Schedule 2 of the Conservation (Natural Habitats etc) Regulations 1994 (Regulation 38). Because of their rarity they are protected under Annexes IIa and IVa of the Habitats and Species Directive and under the Berne Convention.

A2.13 It is illegal to intentionally capture or kill great crested newts; intentionally injure or recklessly disturb GCN including places used for shelter or protection.

Birds

A2.14 All wild bird species, their eggs and nests are protected under Wildlife and Countryside Act 1981 (as amended). You must always try to avoid harming birds or to use measures which do not kill or injure them before considering taking harmful action.

A2.15 It is an offence to intentionally kill, injure or take wild birds, intentionally take, damage or destroy a wild bird's nest while it's being used or built, intentionally take or destroy a wild bird's egg, possess, control or transport live or dead wild birds, or parts of them, or their eggs, sell wild birds or put them on display for sale, use prohibited methods to kill or take wild birds.

A2.16 Some birds, have additional legal protection under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). For these bird species it is also an offence to disturb them while they're nesting, building a nest, in or near a nest that contains their young or disturb their dependent young.

A2.17 The Birds of Conservation Concern (BoCC5) (Stanbury et al., 2021) is also taken into consideration when undertaking this appraisal.

A2.18 Technical Advice Note (TAN) 5: Nature Conservation and Planning (September 2009) provides the national planning framework for the consideration of protected species.

Invasive Plants

A2.19 The Invasive Alien Species (Enforcement and Permitting) Order 2019 states that it is an offence to:

- Release, or allow to escape, into the wild any species of animal which is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state or is included in Part 1 of Schedule 2.
- Plant, or otherwise cause to grow, in the wild any species of plant which is included in Part 2 of Schedule 2.
- Sell, offer or expose for sale, or have in possession or transport for the purposes of sale, any specimen of a species included in Part 3 of Schedule 2, or (b) publish or cause to be published any advertisement likely to be understood as conveying that he buys or sells, or intends to buy or sell, any specimen of a species included in Part 3 of Schedule 2.

A2.20 It is an offence to cause to grow in the wild, any plant which is included in Part II of Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Invasive alien species listed are of special concern because of their invasiveness and ability to establish in several nations across Europe, including the UK. They cause severe problems for native UK species and the environment.

Environmental Damage

A2.21 Any deliberate damage, or damage resulting from negligent actions, to protected species and natural habitats, the conservation status of natural habitats or species and sites of special scientific interest through improper waste management operations, unauthorised discharges into the inland surface water or groundwater, improper usage, storage or transportation of dangerous substances, plant protection products and biocidal products, and/or release of genetically modified organisms into the environment, is an offence in Wales under The Environmental Damage (Prevention and Remediation) (Wales) Regulations 2009.

A2.22 In addition to legislation, there are national and local planning policies pertaining to the protection of biodiversity. The Environment (Wales) Act 2016 makes provision for Biodiversity and Ecological Networks, which introduced an enhanced biodiversity and resilience of ecosystems duty on Local Authorities to consider the need to:

- support the conservation of biodiversity, in particular the conservation of wildlife and habitats;
- ensure action meets international responsibilities and obligations for biodiversity and habitats;
- ensure statutorily and non-statutorily designated sites are properly protected and managed;

- safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them, such as water and soil, including peat; and

- secure enhancement of and improvements to ecosystem resilience by improving diversity, condition, extent, and connectivity of ecological networks.

A2.23 Section 7 of the Environment (Wales) Act 2016 provides the government obligation to list habitats and species of principal importance for the purpose of conserving, or enhancing, biodiversity. This list includes habitats and species where conservation and nature recovery planning and action should be directed.