Ben Jones ECOLOGY

Report Type:	**Retrospective Ecological Appraisal**
Client Name:	**Village Bakery**
Site Address:	**Coed Aben Road Wrexham Industrial Estate Wrexham LL13 9UH**
Report Reference:	**REA BJ26-056.1**
Date of Issue:	**23rd April 2026**
Author:	**Ben Jones BSc (hons) MSc ben@benjonesecology.co.uk 07525 809943**



Report Details	
Classification	Retrospective Ecological Appraisal
Status	Final
Reference	REA BJ26-056.1

Version History	
Report Reference	**Date of Revision**
REA BJ26-056.1	23rd April 2026

Ben Jones Ecology Ltd
Registered office: 10 Oldford Rise, Welshpool, Powys, SY21 7SZ
Company Reg number: 16252799

This report is the copyright of Ben Jones Ecology Ltd. Any unauthorised reproduction or usage by any person without the specific authority of Ben Jones is prohibited.

The report should be read in its entirety. Questions arising from the survey report should be directed to the author of the report who will be pleased to clarify any technical issues raised.

Whilst surveyors make every reasonable effort, Ben Jones Ecology Ltd cannot guarantee that all protected species have been identified and survey results are definitive. Many species are cryptic and transitional in habit.

Reports are considered valid for two years for planning purposes, after which time further survey information may be required.

Ben Jones Ecology Ltd can provide advice and support for recommendations and planning conditions.

The use of this report or survey data for any form of formal submission to an NGO or other authority implicitly implies acceptance of the terms and conditions.

Table of Contents

1 EXECUTIVE SUMMARY 1
1.1 Purpose of the Report 1
1.2 Methodology 1
1.3 Key Impacts 1
2 INTRODUCTION 2
2.1 Project Background 2
2.2 Purpose of the Report 2
2.3 Site Context and Location 2
3 METHODOLOGY & CONSTRAINTS 3
3.1 Desk Study 3
3.2 Field Survey 3
3.3 Species Survey 3
4 CURRENT ECOLOGICAL CONDITIONS 4
4.1 Nearby Features of Importance 4
4.2 Habitats on Site 4
5 POTENTIAL IMPACTS 6
5.1 Bats 6
5.2 Other Mammals 6
5.3 Birds 6
5.4 Amphibians 7
5.5 Invasive Species 8
6 GREEN INFRASTRUCTURE 9
7 CONCLUDING REMARKS 10
APPENDIX A – SURVEYOR DETAILS 11
APPENDIX B – METHODOLOGY 12
APPENDIX C – POLICY 14
APPENDIX D - BIBLIOGRAPHY 17

Table of Figures

Figure 4.1. Identifying any designated areas near site, a 1km buffer is shown 4
Figure 4.2. Site overview 4
Figure 4.3. Grass along east side of building 5
Figure 4.4. Northern end of building, extension extent shown 5
Figure 4.5. Loading bays on northern end 5
Figure 5.1. Roof space in building of no roost value 6
Figure 5.2. Lack of foraging value on exterior 6
Figure 5.3. OS Map showing a 250m buffer around site 7
Figure 5.4. Pond proximity to site 8
Figure 6.1. Step-Wise approach from PPW Chapter 6 9

Table of Tables

Table 3.1. Survey conditions 3
Table A.1. Details of surveyors' experience and licences held 11
Table B.1. Data sources 12
Table B.2. Criteria of ecological values 12

1 Executive Summary

1.1 Purpose of the Report

Ben Jones Ecology was commissioned by DPA Design on behalf of the client, Village Bakery, to undertake a retrospective ecological appraisal of a site off Coed Aben Road, Wrexham Industrial Estate to provide information relating to the extension and change of use of a former warehouse building to a production and office facility.

The survey report has these principal aims:

- To provide an initial assessment of the ecological value of the site in local context.
- To identify potential ecological constraints relating to the development, and recommend measures to avoid, reduce or manage negative effects, and to provide a net ecological gain.

1.2 Methodology

The appraisal included a desktop study for nearby designated sites and a site visit undertaken at the site, OS grid reference SJ37594979 on 7th April 2026 by Ben Jones.

1.3 Key Impacts

The site comprises a warehouse building and associated carpark and loading bays set within the Wrexham Industrial Estate. There are no habitats on site and the whole site has been industrial in nature for many years. Planning permission was granted in 2022 for the building, following the demolition of a previous unit on site. The warehouse building is now being extended and converted into a production facility. Extensions include the addition of ~7m to the northern end, and a narrow 15m long extension on the eastern side. The interior of the building is being changed to enable the building to be used as office space and a production facility.

There is a very narrow strip of poor grassland along the eastern side, a 15m strip of which has been removed for the side extension. No other green habitat has been affected by the works as underway.

The site is located within the industrial estate so there is minimal connectivity to the any surrounding habitat of value. There are wooded blocks 160m north and 180m northeast of site, but these are separated by industrial infrastructure with no ecological corridors. The woodland to the northeast contains a pond that was inaccessible at the time of survey. Great crested newts are known to be present in and around Wrexham Industrial Estate, but the likelihood of the works as conducted being of detriment to the population is negligible. The northern extension was over hardstanding of no terrestrial value, and the side extension removed a very small strip of extremely poor condition grass. No negative impact is thought likely to have occurred.

It seems clear from an analysis of pre- and post-intervention photography and satellite imagery that no loss of significant or priority habitat has taken place. The site was not previously of any value for wildlife and continues to be invaluable.

There is no scope for ecological enhancement around the site, so none has been recommended.

2 Introduction

This report has been compiled by Ben Jones BSc (hons) MSc who has over 10 years' experience conducting ecological appraisals.

For full details of surveyors and licences please see Appendix A.

2.1 Project Background

Ben Jones Ecology was commissioned by Village Bakery to conduct a survey to determine the presence of protected species and potential for the damage or destruction of habitats of value. This forms part of the retrospective planning application for the extension of the warehouse building, and conversion to mixed office and production space.

The warehouse building was constructed in 2023 following permission in 2022. This is seen on historical satellite views. Prior to this work, the previous facility was demolished between 2018 and 2023.

2.2 Purpose of the Report

This report aims to:

- Identify any likely ecological impacts from the site alterations already undertaken particularly in relation to priority habitats and species, and protected species (HMSO, 1981).
- Allow any necessary measures to be developed following the mitigation hierarchy and to ensure net benefit to biodiversity.
- Identify the opportunities offered by a project to deliver ecological enhancement (Ministry of Housing, Communities and Local Government, 2021).

2.3 Site Context and Location

The site is located in the industrial estate, OS grid reference SJ37594979. It is set in an urban environment surrounded by the rest of the industrial units on all sides. The Industrial Estate has small woodlands within it, two of which are less than 200m from site to the north and northeast.

3 Methodology & Constraints

Broad methodologies for data collection and interpretation were informed by PEA guidance (CIEEM, 2017). Full details can be found in Appendix B.

3.1 Desk Study

The desk study provides contextual information such as the site's proximity to designated areas and previously granted licences (Natural England, 2018).

3.2 Field Survey

3.2.1 Date and Survey Conditions

Table 3.1. Survey conditions

Date	Time	Study Area	Equipment Used	Weather
07/04/2026	10:00	Whole site	Camera, strong torch, DJI mini 4 pro drone	Clear sky, warm, slight breeze, dry
Comments	One surveyor used: Ben Jones Constraints: None All undated photographs in this document were taken on this date by the author unless otherwise stated.			

3.2.2 Habitats

The habitats on site were assessed for their potential to support protected species and therefore assist in the determination of site value.

3.3 Species Survey

3.3.1 Bats

An assessment of the suitability of site to support roosting bats was conducted following best practice guidance looking for evidence of roosting or potential access points (Collins, J. BCT, 2023). There were no constraints to this methodology.

3.3.2 Other Mammals

[redacted]

3.3.3 Birds

An assessment of the suitability of site and its surrounds to support nesting birds was conducted, looking for current/old nests and listening for bird calls. There were no constraints to this methodology.

3.3.4 Amphibians

An assessment of terrestrial habitats of site and its surrounds to support great crested newts was conducted by looking for potential shelter and commuting features (Langton, et al., 2001).

3.3.5 Invasive Species

Signs of invasive non-native plant species were searched for throughout the site.

4 Current Ecological Conditions

4.1 Nearby Features of Importance

The map from Natural England presented in Figure 4.1 indicated that the site is not within 1km of any designated areas.



Figure 4.1. Identifying any designated areas near site, a 1km buffer is shown

4.2 Habitats on Site

The site comprises an industrial unit; the former warehouse building surrounded by carpark to the south and loading bays to the north. The majority of site is unvegetated hardstanding, aside from a small ornamental grass area in the southwest corner adjacent to the road, and a strip of grass up the eastern side of the building.



Figure 4.2. Site overview

The strip of grass along the eastern side of the building is of negligible ecological value. A the time of survey it was heavily disturbed, but is unlikely to be of significant value even when undisturbed.



Figure 4.3. Grass along east side of building



Figure 4.4. Northern end of building, extension extent shown

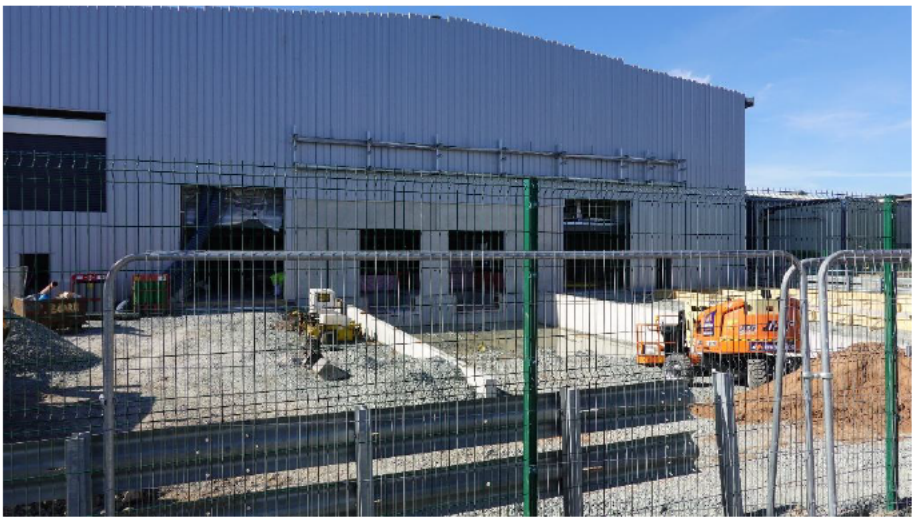


Figure 4.5. Loading bays on northern end

5 Potential Impacts

5.1 Bats

The warehouse interior was checked for potential to support roosting bats and none is present. The site is isolated in the environment and there are no suitable foraging or commuting routes around the site. No negative impact from works undertaken is considered likely upon local bats.



Figure 5.1. Roof space in building of no roost value



Figure 5.2. Lack of foraging value on exterior

5.2 Other Mammals

[redacted]

5.3 Birds

The site is not constructed of materials or design typically valuable to nesting birds. No nests were seen on the exterior of the building, and no vegetation is present around the building that might support nesting birds. No negative impact is considered likely from the works conducted.

5.4 Amphibians

The site has no value for amphibians in their terrestrial phase. The hardstanding and concrete present on a constantly working industrial site offers no permanent shelter or foraging opportunities.

There is one pond within 250m according to OS maps, within the woodland block to the northeast. This was not accessible at the time of survey, but the view by drone shows the habitat around the pond is significantly greater than that on site. Newts have been found to stay within a core area around breeding ponds when given the opportunity, and have no connective lines to pass between the pond and high value wooded area to this ecologically barren site.

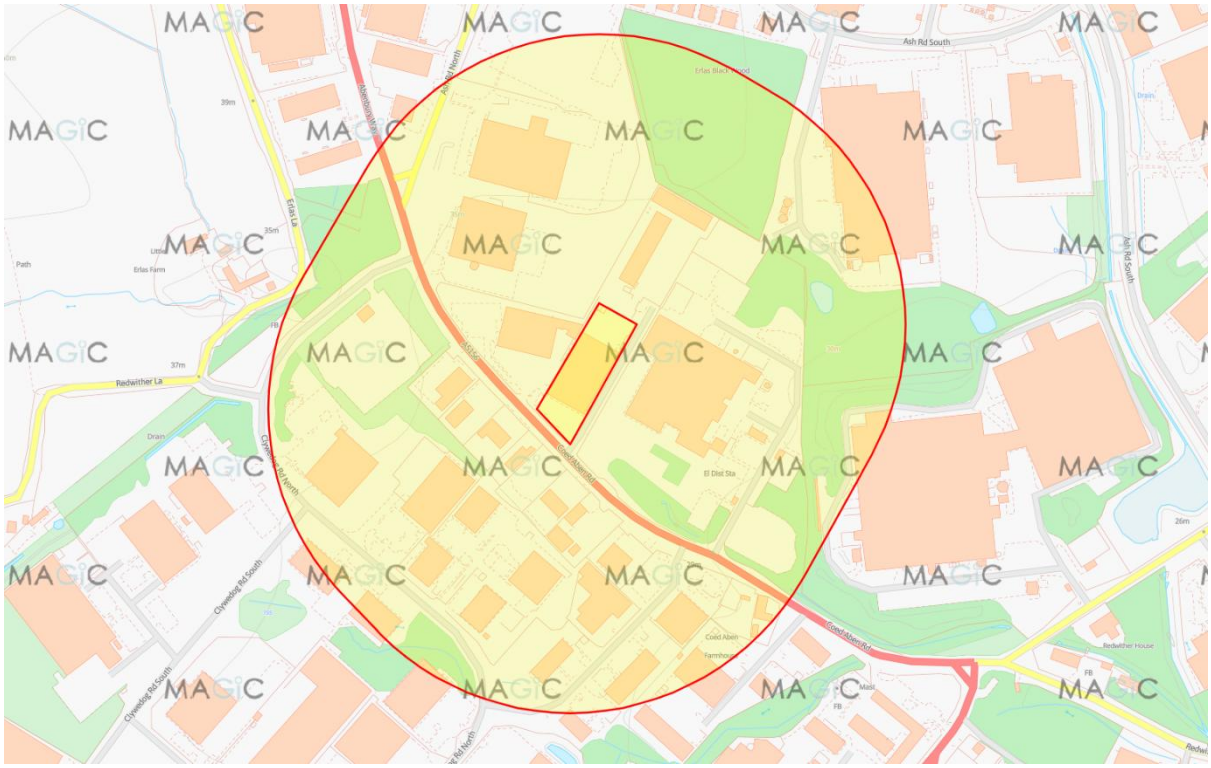


Figure 5.3. OS Map showing a 250m buffer around site



Figure 5.4. Pond proximity to site

The works as undertaken neither enhance nor detract from terrestrial value for amphibians. No negative impact is considered likely.

5.5 Invasive Species

No evidence of invasive species was found on or around the site. No mitigation measures are required and no negative impact is considered likely from any works undertaken, or to be undertaken in future.

6 Green Infrastructure

The Step-Wise approach outlined in Figure 12 of PPW outlines the mitigation hierarchy which is assessed in conjunction with the DECCA attributes (Diversity, Extent, Condition, Connectivity and Aspects) outlined in "Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System" (CIEEM, 2022).

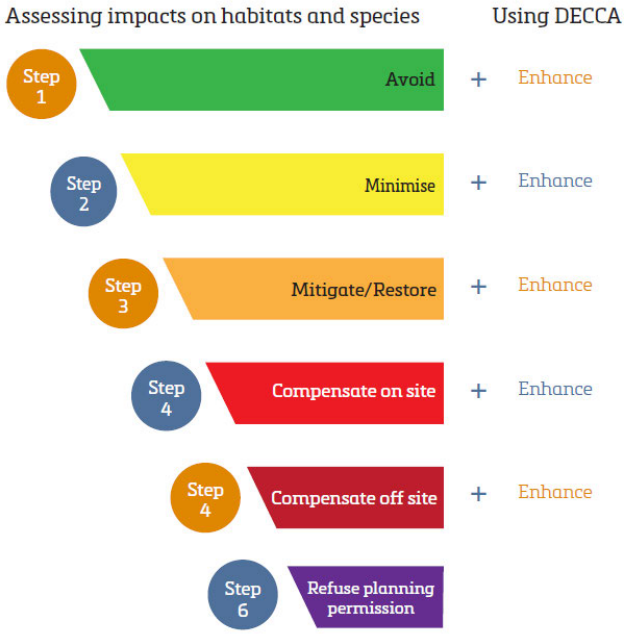


Figure 6.1. Step-Wise approach from PPW Chapter 6

The step-wise approach is somewhat limited when considering retrospective applications, but it is addressed below in terms of most-likely impacts and steps.

Step 1 of the Step-Wise approach is to avoid the impacts entirely which applies on this site as there is no ecological value on site to avoid disturbance of. This fact also covers the remaining steps as there is nothing to minimise, mitigate or compensate for.

It is clear from the information above that the Step-Wise Approach was inadvertently followed and works are unlikely to have caused any significant impacts on local biodiversity. The reinstatement of the pond is likely a significant net benefit for biodiversity.

7 Concluding Remarks

The survey has focussed on the potential habitats or protected species which may have been impacted by the development as undertaken thus far.

The works on site are unlikely to have had any negative impact on local ecology as the industrial nature of site has not changed, and the altered building is unlikely to ever have been of value for wildlife.

The only pond within 250m is situated in excellent habitat, with no connective corridors to the site. No negative impact from the works is considered likely to have occurred.

There is no scope to provide habitat enhancements on this site, so none have been recommended.

The development as undertaken prior to assessment is unlikely to have caused any significant negative impacts.

Appendix A – Surveyor Details

Table A.1. Details of surveyors' experience and licences held

Name	Membership of associations/ experience	Licenses
Ben Jones BSc(hons) MSc	Senior Consultant MCIEEM Ben has a degree in Marine and Freshwater biology and a Master's degree in "Managing the Environment". He has 11 years' experience conducting environmental appraisals and phase 2 surveys for bats and newts in England and Wales. As a member of the CIEEM he is bound by professional conduct.	Holder of survey licenses for bats and newts in England and Wales. <u>England:</u> Bats - 2025-86501-CL18-BAT GCN - 2025-81907-SCI-CL08 <u>Wales:</u> Bats – S095663/1 GCN – S094375/1

Appendix B – Methodology

Desk Study

Table B.1. Data sources

Organisation/Resource	Information Assessed
MAGIC website	International statutory designations (1km) • Special Protection areas (SPA) • Special Areas of Conservation (SAC) • RAMSAR sites National statutory designations (1km) • Sites of Special Scientific Interest (SSSI) • National Nature Reserves (NNR)

A search on Multi Agency Geographic Information for the Countryside (Magic Maps) determined nearby designated areas. The map is presented in Section 4.1.

Field Survey

The level of survey is aimed to identify field signs of or habitats with the potential to support protected species and therefore assist in the determination for detailed phase 2 surveys.

Determination of Ecological Value is based on the general criteria provided by CIEEM (2017).

Table B.2. Criteria of ecological values

Ecological Value	Description and Examples
High	Habitats or features that have high importance for nature conservation, such as statutory designated nature conservation sites of international or national importance or sites maintaining viable populations of species of international or national importance (e.g. Red Data Book species; European protected species).
Medium	Sites designated at a county or district level, e.g. Local Wildlife Site (LWS), ancient woodland site, ecologically 'important' hedgerows or ecological features that are notable within the context of a region, county or district (e.g. a viable area of a Priority Habitat or a site that supports a viable population of a priority species).
Low	Sites of nature conservation value within the context of a parish or neighbourhood, low-grade common habitats, such as arable fields and improved grasslands and sites supporting common, widespread species.

Species Surveys

Bats

Features on site were assessed for potential for bat roosts, foraging and commuting.

Daytime surveys were conducted with the aid of a strong torch and 12x55 monocular. Bat species may leave little evidence of their presence.

Evidence for the presence of bats includes:

- Holes, cracks and rot holes used as roosts, marked by streaks of urine and faeces.
- Smoothed, darkened edges where bats have rubbed and left natural body oils when entering and exiting a space.
- Faeces under a well-used feeding point or a resting spot.
- Feeding signs such as discarded insect wings under a feeding point.
- Presence of roosting or dead bats in or behind any object.

Badgers

Surveys were conducted in line with Harris, S., Cresswell, P. and Jefferies, D. (1989) Surveying Badgers. Mammal Society - No9.

Daytime surveys for badgers involved looking for:

- Scrapings where badgers have dug for food or used as latrines.
- Signs of a sett, including signs of use such as presence of badger hair.
- Tracks and prints.

Birds

Searching for evidence of nesting birds, including barn owls, involved looking for:

- Presence of nests
- Collections of droppings and/or feathers
- Highly distinctive droppings or splats under roosting points.
- Presence of owl pellets/feathers
- Listening for bird song
- Recording bird activity

Amphibians and Reptiles

The terrestrial habitats at the application site were surveyed and assessed for their suitability and potential value for the support of GCN. The general topography, ground conditions and presence or absence of vegetation were recorded. A refugia search was conducted for amphibians and reptiles by looking under any logs, large stones and other debris.

Appendix C – Policy

The following areas of policy and legislation are of relevance to ecology and provide context to the surveys conducted. Findings presented in this report are in line with the following:

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – as listed in:

- Schedule 2. European protected species of animals
- Schedule 5. European protected species of plants

The Wildlife and Countryside Act (1981) – as listed in:

- Schedule 1. Birds protected by special penalties at all times
- Schedule 5. Protected animals
- Schedule 8. Protected plants

Countryside and Rights of Way Act (2000)

Hedgerow Regulations (1997)

The Protection of Badgers Act (1992)

Planning Policy Wales 12th edition, updated Feb 2024
Section 6.2 – Green Infrastructure
Section 6.4 – Biodiversity and Ecological Networks

The Nature Recovery Plan for Wales – Setting the course for 2020 and beyond (2015)

Environment Act (Wales) (2016)
Section 6 – Enhancement for biodiversity requirement
Section 7 – Lists of priority species and habitats

Bats

All bat species are protected under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 which implements the EC Directive 92/43/EEC in the United Kingdom. It is an offence, with certain exceptions, to:

- Deliberately capture or kill any wild animal of a European Protected Species.
- Deliberately disturb any such animal.
- Damage or destroy a breeding site or resting place of such a wild animal.
- Keep (possess), transport, sell or exchange, or offer for sale or exchange, any live or dead wild animal or plant of a European Protected Species, or any part of, or anything derived from such a wild animal or plant.

A person found guilty of an offence is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine or to both .

Seven bat species are on the UK Biodiversity Action Plan and are listed as Species of Principal Importance under the provisions of the Natural Environment and Rural Communities (NERC) Act 2006. The National Planning Policy Framework (NPPF) states that to minimise impacts on biodiversity and geodiversity, "*planning policies should… promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations*".

Badgers

Badgers and their setts are specifically protected (HMSO, 1992). The act was primarily bought into force to prevent the deliberate injury to or death of badgers. Some aspects of the act affect developers. It is important that developers are aware of any badger setts located on the land they intend to develop.

All personnel working on sites where there are badgers should be aware of the Protection of Badgers Act 1992. Under this legislation it is an offence to:

- Damage a badger sett or any part of it.
- Destroy a badger sett.
- Obstruct access to, or any entrance of a badger sett.
- Causing a dog to enter a badger sett.
- Disturbing a badger when it is occupying a badger sett.

Birds

Under Section 1 of the Wildlife and Countryside Act 1981 (as amended), birds, their nests and young are all protected from damage, particularly during the breeding season. The Act allows for fines or prison sentences for every bird, egg or nest destroyed. It makes it an offence to:

- Intentionally kill, injure or take any wild bird.
- Take, damage or destroy the nest of any wild bird whilst it is in use or being built.
- Take damage or destroy the egg of any wild bird.
- To have in one's possession or control any wild bird, dead or alive or egg or any part of a wild bird or egg.

Some bird species are included in the UK and local BAPS and are recognised as species of principal importance for nature conservation in accordance with section 41 of the NERC Act 2006. Such species and their habitats receive protection through the provisions of the NPPF.

Amphibians

All species of amphibians receive a measure of protection under legislation.

The Wildlife and Countryside Act 1981 has been amended by the Countryside and Rights of Way Act (CRoW) 2000. This applies to England and Wales only. The key relevant fact is:

- Section 9(4) is amended to create and additional offence of reckless damage to, destruction of, or obstruction of access to, any structure or place used for shelter or protection; and reckless disturbance while occupying such a structure or place.

Great Crested Newts

Great crested newts are protected under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 which implements the EC Directed 92/43/EEC in the United Kingdom. It is an offence, with certain exceptions, to:

- Deliberately capture or kill any wild animal of a European Protected Species.
- Deliberately disturb any such animal.
- Deliberately take or destroy eggs of any such wild animal.
- Damage or destroy a breeding site or resting place of such a wild animal.
- Keep (possess), transport, sell or exchange, or offer for sale or exchange, any live or dead wild animal or plant of a European Protected Species, or any part of, or anything derived from such a wild animal or plant.

Great crested newts are listed as a priority species on the UK BAP and Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The National Planning Policy Framework (NPPF) states that to minimise impacts on biodiversity and geodiversity, "*planning policies should... promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations*".

Appendix D - Bibliography

CIEEM Guidelines for Preliminary Ecological Appraisal, 2nd Edition. - Winchester : Chartered Institute of Ecology and Environmental Management, 2017.

CIEEM Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System [Report]. - [s.l.] : CIEEM, 2022.

Collins, J. BCT Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition / ed. Collins J. - London : Bat Conservation Trust, 2023.

HMSO The Protection of Badgers Act 1992. - London : HMSO, 1992.

HMSO Wildlife and Countryside Act 1981. - London : HMSO, 1981.

Langton T E. S, Beckett C L and Foster J P Great Crested Newt Conservation Handbook [Book]. - Haylesworth : Froglife, 2001. - 1st.

Ministry of Housing, Communities and Local Government National Planning Policy Framework 2019. - London : Ministry of Housing, Communities and Local Government, 2021.

Natural England Nature on the Map, Magic Maps, http://magic.defra.gov.uk/magicmap.aspx. - London : Natural England, 2018.

Scottish Badgers Surveying for Badgers: Good Practice Guidelines version 1. - 2018.