Land West of Tudor Drive,

Penley, Wrexham, LL13 0JN

Preliminary Ecological Appraisal

and

Protected Species Report

21st July 2026



Produced by

www.wildbanksconservation.com

REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

Report Version	Date	Completed by:	Date	Approved by:
Final	10/07/26	Tanya Cobb	21/07/26	Mick Smith

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

DISCLAIMER

The contents of this report are the responsibility of Wildbanks Conservation Ltd. It should be noted that, whilst every effort is made to meet the client's brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Wildbanks Conservation Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

C O N T E N T S:

1.0 Introduction

2.0 Site Description

3.0 Survey Methodology

4.0 Results

5.0 Appraisal of Potential Effects

6.0 Discussion and Recommendations

7.0 References

APPENDICES

A1 Site Photographs – plates 1-7

A2 Tree Photographs

A3 Legislation and Planning Policy

A4 Ancient Woodland Inventory 2021 Extract

A5 Historic Maps of Penley Area

A6 Green Infrastructure Statement and Net Biodiversity Benefit Plan dated 20/02/2026

1.0 INTRODUCTION

1.1 This report has been prepared on behalf of Mr James Sadowski and provides the results of a Preliminary Ecological Appraisal (PEA) and protected species surveys, including HSI survey, GCN population survey, Ground Level Tree Assessments for bats and static bat detector survey, undertaken between April 2026 and July 2026. The PEA considers the potential ecological constraints and impacts associated with the change of use of an area of concrete covered with small trees, scrub and leaf litter within the former Penley Polish Hospital into a timber and machinery storage yard, which took place in 2019. The site is located on land West of Tudor Drive, Penley, Wrexham, LL13 0JN (approximate OS Grid Ref: SJ 41330 39394).

1.2 A retrospective planning application for the change of use has been submitted to Wrexham County Borough Council (planning application ref: P/2026/0085) and NRW have responded recommending more information is sought regarding protected species, in particular, with respect to "records of Great Crested Newt in the vicinity" and the presence of ancient woodland on site (NRW response dated 10/03/2026). Comments from Wrexham Council during the consultation process also highlighted the site is within a Special Landscape Area and a Local Wildlife Site, and that the impacts of the development have not been addressed. This Report aims to address these concerns and provide appropriate recommendations.

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

- Provide details 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;
- Compare these to what the habitats were prior to the clearance of the yard in 2019;
- Provide recommendations for further survey work and/or mitigation measures, if required;
- Provide recommendations for habitat enhancements to obtain a net gain in biodiversity.

1.4 The redline boundary of the site consists of predominantly a hardstanding yard and access track within a broadleaf woodland block that sits on top of the former Penley Polish Hospital site. It is currently used for the storage of timber, machinery and activities associated with operating an arboricultural services business. The land within the redline boundary is hereto referred to as "the Site" and is defined on Figure 1. To satisfy the retrospective planning application, this PEA also details the habitats that were likely present on the Site before clearance works began in 2019 and habitats present today, as well as assesses what impacts the clearance of the site in 2019 may have had on protected species and habitats that may have been present.

1.5 Sambrook Associates, in partnership with Wildbanks Conservation, were previously commissioned to conduct protected species surveys on a section of land within the wider landownership boundary, and adjacent to the Site (but did not include the Site), in 2020, to support a previous, unrelated planning application. Results of these 2020 surveys are summarised, where appropriate, within this Appraisal to provide background information and wider habitat context.

1.6 Protected species surveys in 2020 included Potential Roost Assessment (PRA) of all trees within the previous application redline boundary and within a 30m buffer, Bat Activity Surveys as well as a Habitat Suitability Index (HSI) assessment and GCN Presence/Absence and Size Class Surveys of two ponds.

2.0 SITE DESCRIPTION

2.1 The Site is situated 450m south of Penley village, within the administrative boundary of Wrexham County Borough Council (WCBC). The Site consists of a large hardstanding yard and access track. The Site is located within a broadleaved woodland, also owned by Mr Sadowski, and occupies part of the former Llanerch Panna No. 83 Station Hospital, later known as Polish Hospital No. 11, which closed in 1949. The Polish hospital was built during WWII and was used to treat Polish patients in 1946. It remained a campus-style hospital until it closed in 1949 with accommodation at its peak housing 800 patients plus staff. Extensive remnants of the former hospital infrastructure, including concrete foundations, roads and hardstanding, remain across much of the ground within the Eastern portion of the adjacent landownership. The Site is set in a section of the hospital formerly used as a vehicle service yard. Prior to the building of the hospital the ground was farmland as can be seen from the historic map excerpt in Plate A5.1.

2.2 The Site is accessed via a private drive which runs from Tudor Drive to 'The Cottage,' a residential dwelling to the west of the Site.

2.2.1 Since the hospital closed in 1949, the Site and wider land has been mostly unmanaged. Most buildings have been removed/demolished, and the residual concrete bases, rubble piles and network of paths and roads of the numerous buildings have been left in situ and constitute approximately 60% of its surface area. Most of these concrete bases and tracks are still visible or covered with a layer of leaf mulch and humous and vegetation. Trees and scrub have since grown adjacent to, and in some places on top of, the concrete pads creating a woodland habitat since its abandonment in 1949. A small number of individual mature trees that would have been present when the Hospital was built also remain.

2.2.2 Ground clearance works have taken place to the track and eastern areas of the Site since 2019. Works include scraping humous and vegetation, including scrub and small trees, from the concrete hardstanding to facilitate vehicle access to and within the Site. This removed vegetation has been

left in situ around the yard and mounded into a soil bund to the east and south of the yard. Some tree works have been undertaken, including felling of dangerous, windblown and caught-up trees, to maintain public safety. These trees have been left on the ground, where possible or processed for commercial timber. A historic aerial photograph of the Site has been included (Figure 3) to compare the amount of tree cover and exposed hardstanding in 2018 compared to 2026 and to assist in the categorisation of the habitats present prior to the Site's clearance in 2019.

2.3 The wider landownership is immediately bounded by residential properties to the east and southwest, and pastural and arable farmland to the north, northwest and south. The wider landscape includes mostly pasture and arable farmland, scattered broadleaf woodland and small residential developments, with amenities present to support the local community. A brook lies 280m South of the Site, which marks the England-Wales border.



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



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

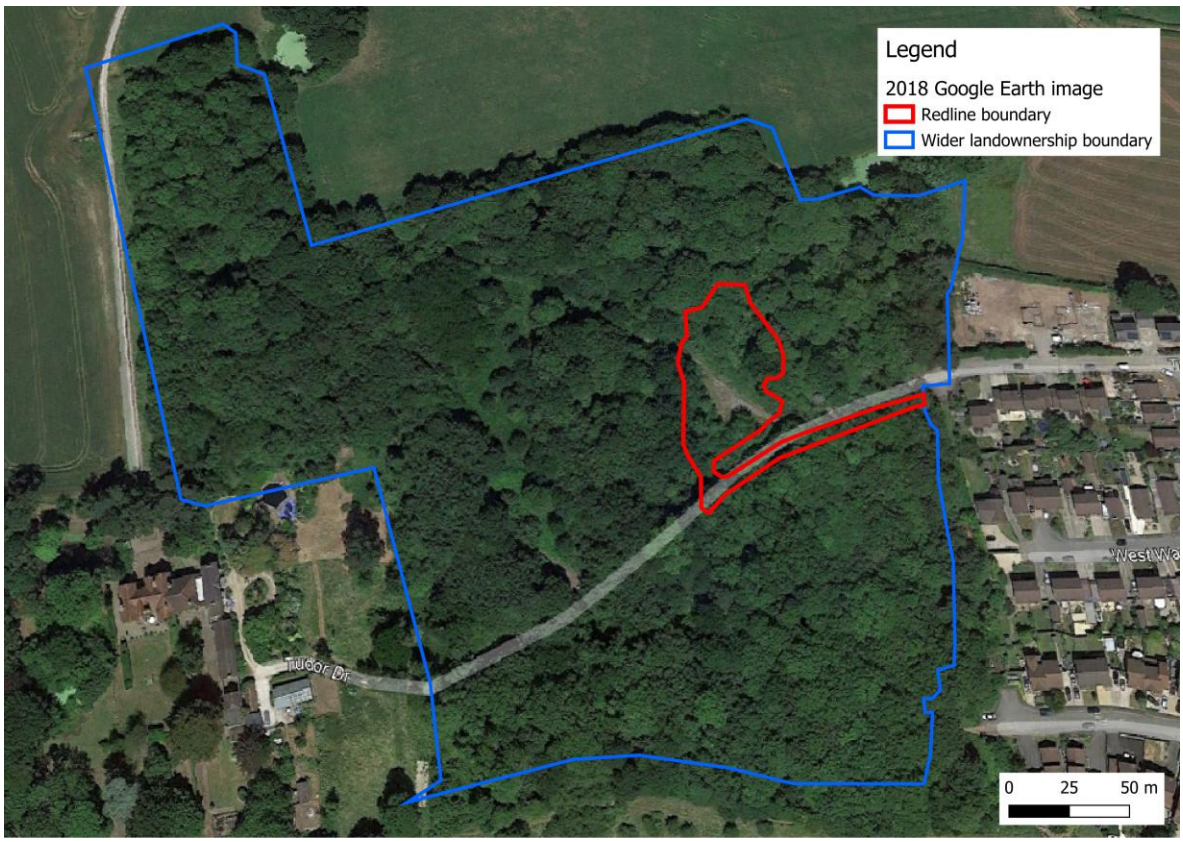


Figure 3. Historic aerial map from 2018 showing approximate super-imposed Site boundary outlined red and wider landownership boundary outlined blue (Google, 2018).

3.0 SURVEY METHODOLOGY

3.1 To inform this Preliminary Ecological Appraisal and Protected Species Report, 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. The following other online resources were also used for background information of the Site.

- NRW Wales Environment Information Portal
- 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 Mick Smith BSc MCIEEM Director, Wildbanks Conservation, on 30th April 2026.

3.4 Protected Species

3.4.1 The Site was assessed and searched for evidence of, or features/habitat that could be used by protected species such as great crested newts (GCN) *Triturus cristatus*, reptiles, bats, badgers *Meles meles*, otters *Lutra lutra,* water vole *Arvicola amphibius,* nesting birds and also any invasive plants or animals.

3.4.2 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 are recommended to be carried out.

3.5 *Great Crested Newt*

3.5.1 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.

3.5.2 Any waterbodies identified on Site, or within 250m, 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

GCN Presence/Absence and Size Class Surveys

3.5.3 Presence/absence surveys were conducted on ponds that scored Average and above on the HSI survey, this includes ponds P1 & P2, which were subjected to GCN presence/absence and Size Class Surveys in 2020. Four surveys were undertaken on pond P1, and six surveys were undertaken on pond P2 to establish population size class in 2026. Surveys were undertaken in accordance with English Nature's (now Natural England) Great Crested Newt Mitigation Guidelines (2001). All surveys were overseen by Mick Smith, 18 years' experience in GCN ecology, holder of NRW GCN licence (licence no: S094688/1). Surveys were undertaken over the course of the GCN survey season in 2026, with at least three of the visits undertaken between the required period of mid-April to mid-May.

3.5.4 Survey methods included bottle trapping, torching and egg searches. Once eggs were found, natural refugia searches were undertaken to limit further damage/destruction of eggs.

Table 2. GCN Presence/Absence and Size Class Survey were carried out as follows:

Date	Pond	Surveyors
30/04/2026	P1 & P2	M. Smith
05/05/2026	P1 & P2	Chris Gosset (NE GCN licence no: 2017-28794-CLS-CLS) & Tony Medcalf
14/05/2026	P1 & P2	M. Smith & Tanya Cobb
21/05/2026	P1 & P2	M. Smith
04/06/2026	P2	T. Medcalf & Joe Carroll
11/06/2026	P2	Jack Halpin (NRW GCN licence no: S096846/1) & T. Cobb

3.6 *Reptiles*

3.6.1 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.

3.6.2 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.

3.7 *Bats*

3.7.1 All buildings/structures/trees within the Site, or immediately bordering the Site, were assessed for their potential to host roosting bats in line with Bat Survey Guidelines (Collins, 2023). No buildings or structures exist within the Site

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

Ground Level Tree Assessment

3.7.3 A Ground Level Tree Assessment (GLTA) was conducted on all trees that may be affected by the ongoing use of the Site as a place of business.

3.7.4 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.

3.7.5 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.

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

Static Bat Detectors

3.7.7 Two static bat detectors were deployed for three weeks between 21/05/26 and 11/06/26 (total 21 nights) within the Site. These were located on trees T4 and T9. Anabat Swift bat detectors were used with 128GB internal memory storage card. Weather conditions within the period varied but were predominantly good for bats with few nights of heavy rain and prolonged periods of warm weather

3.8 [redacted]

3.8.1 [redacted].

3.9 *Otter*

3.9.1 During the Field Survey, visual searching methods were used to establish the Sites suitability for otter. An assessment was made of the habitats present to support otters based upon factors including proximity to watercourses, habitat type, vegetation cover, volume of human disturbance and prey availability as per survey guidelines (South Wales Wildlife Trust, 2024). Any areas of woodland or thick scrub, extensive reed beds, ponds and lakes, timber stacks and log piles, groups of windblown trees, large bank-side root systems, hollow trunks or stands of tussocky, tall, fen vegetation, especially if connected to waterbody edges and riparian corridors, were searched, where possible.

3.10 *Water vole*

3.10.1 During the field survey, an assessment was made of the habitats present on the Site for their suitability for use by water vole, taking into account proximity to watercourses, habitat type, vegetation cover and volume of human disturbance. Any watercourse identified on, or adjacent, to the Site, were assessed for their potential to support water vole using the Water Vole Conservation Handbook (Strachan et al., 2011).

3.11 *Birds*

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

3.12 *Invasive Species*

3.12.1 During the Site field survey, visual searching methods were used to identify any non-native invasive species present. The survey was inclusive of all habitats present.

3.13 **Survey Limitations**

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

3.13.2 GLTAs are an approximation of bat roosting potential due to not all PRFs potentially being visible from the ground and the extent of each feature cannot always be established accurately. Assessments were undertaken whilst the trees were in leaf so visibility of PRFs from the ground was limited. However, the trees were in good condition, with no obvious signs of damage which would increase the likelihood of PRFs being present.

3.13.3 A technical fault occurred during the static bat detector deployment of static detector 2. Some of the bat call data was corrupted and therefore, calls between 05/06/26 and 10/06/26 were lost (Figure 7). However, over 3900 bat calls were recorded and retrieved from this detector which provide ample data to assess local bat use of the Site.

4.0 RESULTS

4.1 Desk Top Study

4.1.1 No statutory designated sites exist within 2km of the Site.

4.1.2 No registered Environment (Wales) Act Section 7 Terrestrial Habitat of Priority Importance is located within the Site.

4.1.3 The Site does include an area of approximately 500m2 of registered Ancient Semi Natural Woodland. This area is located along the access track to the Site. A review of various online historical mapping resources shows that the Site has only supported woodland since the late 1900s. The map entitled 'Actual survey of the County Salop' by John Rocque in 1752 (Plate A5.2) shows that the area where the Site is located was likely fields and not under tree cover at the time of the survey. A range of different detailed Shropshire Ordnance Survey 6-inch maps dated between 1873 to 1924 of Penley (Plates A5.3 – A5.5), shows the site as being parkland associated with the Llanerch-Panna estate until the 1940s when the Second World War era hospitals were built on the land. It is not known on what grounds the Ancient Woodland Inventory 2021 categorised the access track through the woodland as ancient woodland as the land does not qualify as Ancient Woodland under any of the sub-categories; Ancient Semi Natural Woodland (ASNW), Plantation on Ancient Woodland Site (PAWS), Restored Ancient Woodland Site (RAWS) or Ancient Woodland Site of Unknown Category (AWSU). As such it is considered that there is no justification to consider the wider woodland, that the Site is situated, as Semi Ancient Woodland.

4.1.4 The site is located within the River Dee Special Area of Conservation (SAC) catchment area, however, NRW state in their response dated 10/03/2026:

"*We note the application site is within the catchment of the River Dee Special Area of Conservation (SAC). In line with our Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation, under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.*

However, the application as submitted is unlikely to increase the amount of nutrients entering the catchment. Therefore, we are satisfied that the proposal is not likely to have a significant effect on the River Dee SAC."

Therefore, this will not be referenced further within this Appraisal.

4.1.5 The Site also exists within two non-statutory designated sites: Isycoed/Maelor Special Landscape Area and Llanerch Panna Local Wildlife Site. Both sites are of a wide area that encompasses site and as well as large extent of other land.

- Isycoed/Maelor Special Landscape Area (SLA): Defined by "*undulating, mainly pastoral lowland farmland, relatively tranquil rural area, well-managed hedges with hedgerow trees and small woodlands … field ponds abundant on areas with clay soils, historic settlement pattern with moated settlements and remnants of medieval ridge and furrow, patches of valuable semi natural habitats*" all with a strong English influence (WCBC, 2007). 'Penley Polish Hospital' is named as a cultural characteristic of the landscape, however, this refers to predominantly the Penley Polish Hospital no. 3, located to the north of Penley town, which is "now in industrial or residential use" (WCBC, 2007). The Isycoed/Maelor SLA can be subdivided into 2 main areas, of which the Site lies within the western part, which has been designated as a Landscape of Special Historic Interest. With this designation, the land is categorised as having "heavier soils, and traditional pastoral agriculture, many areas of medieval ridge and furrow, moated settlements, and other features have been preserved." The Site does not consist of any of the designated habitats referred to above except woodland, however, the woodland previously found on Site, and adjacent to, is predominantly secondary, non-native sycamore woodland. The only aspects of the SLA management strategy applicable to the Site and wider land ownership are "retain, manage and expand woodland habitats" and "support cultural heritage", both of which will be achieved within the mitigation for the proposed application.

- Llanerch Panna Local Wildlife Site: Defined as *"a site consisting of woodland and associated grassland areas. The majority of the site is a woodland within the grounds of an old hospital. Sycamore is the dominant canopy tree with some pedunculate oak, ash and horse chestnut throughout. The understorey and ground flora are under developed but do contain some ancient woodland indicators, such as field maple, bluebell, wood melick and dog's mercury. There are areas of rough grassland and scrub around the old building sites and paths. To the south is a semi-improved slope with a fair diversity of herbs, e.g. lesser stitchwort and field wood-rush. This grassland adjoins Penley Bank, which has a mosaic of grassland, wood, scrub and marsh habitats. The most diverse area here is a slope with such species as glaucous sedge, sweet vernal grass, meadow vetchling, cowslip, oxeye daisy, marsh marigold and fleabane present."* (May, 2026). The Llanerch Panna LWS includes the area of woodland owed by Mr Sadowski, including the Site as well as areas of grassland and woodland to the south, south east and south west.

4.2 Field survey

4.2.1 The Site is located within the vehicle service yard of the former Penley Polish Hospital. The vehicle inspection ramp is still present to the north of the yard. The yard is 90% concrete with a small area of bare ground to the East (Plates 1 to 5). No vegetation currently exists within the Site except one dead, semi-mature Ash tree (T9).

4.2.2 The Site margins currently consist of mature trees, scrub and the following floral species; Ash sapling (*Fraxinus excelsior*), Barren brome (*Bromus sterilis*), Black medick (*Medicago lupulina*), Broad-

leaved dock (or Dock sp.) (*Rumex obtusifolius*, or *Rumex* sp. if not identified), Cleavers (*Galium aparine*), Common nettle (*Urtica dioica*), Creeping bent (*Agrostis stolonifera*), Creeping buttercup (*Ranunculus repens*), Creeping thistle (*Cirsium arvense*), Cut-leaved cranesbill (*Geranium dissectum*), Great willowherb (*Epilobium hirsutum*), Greater plantain (*Plantago major*), Green alkanet (*Pentaglottis sempervirens*), Hedge bindweed (*Calystegia sepium*), Herb-Robert (*Geranium robertianum*), Marsh foxtail (*Alopecurus geniculatus*), Nipplewort (*Lapsana communis*), Pendulous sedge (*Carex pendula*), Prickly sow-thistle (*Sonchus asper*), Ragwort (*Jacobaea* sp., or *Jacobaea vulgaris* if Common Ragwort), Rough meadow-grass (*Poa trivialis*), Soft rush (*Juncus effusus*), Toad rush (*Juncus bufonius*), Tufted vetch (*Vicia cracca*), White clover (*Trifolium repens*), Willow sapling (*Salix* sp.), Willowherb (*Epilobium* sp.), Wood dock (Bloody dock) (*Rumex sanguineus*), Yellow flag iris (*Iris pseudacorus*) and Yorkshire fog (*Holcus lanatus*).

4.2.3 The scrub consists of predominantly Holly (*Ilex aquafolium*), Hawthorn (*Crataegus monogyna*), Hazel (*Coryllus avellana*), Blackthorn (*Prunus spinosa*), Bramble (*Rubus fruticosus agg.*) and Common ivy (*Hedera helix*).

4.2.4 A large earth bund has been created around the yard on the eastern and southern boundaries of the Site, using topsoil and brash from within the redline boundary when the yard was cleared of debris. It acts as a buffer to sound and visual appearance from the working operations within the yard. This bund has vegetated with ruderal species included in the species list above and is approximately 2m-2.5m high along its length

4.2.5 The primary habitat present adjacent to the Site is broadleaf woodland which has established and matured since the hospital's closure in 1949. This woodland comprises of a very closed canopy of, self-seeded trees and scrub, which has allowed all the trees to grow very tall. As the trees and scrub are growing on, or immediately adjacent to, concrete tracks and building pads, they have weak root systems that do not facilitate strong root plates or healthy growth to full maturity. Therefore, the woodland consists of lots of dead wood and fallen trees. A large proportion of trees have been coppiced circa 25 years ago. Approximately 60% of the ground is concrete pads or hard surfaced paths with up to 100mm of leaf litter and mulch now covering them. Significant areas of rubble, broken concrete and metal from the old buildings are also present throughout the wider landownership.

4.2.6 The species lists in paragraphs 4.2.2 and 4.2.3 are also representative of the herbaceous species found within the wider land ownership.

4.3 Protected Species Surveys

4.3.1 *Great Crested Newt*

4.3.1.1 No waterbodies were identified within the redline boundary. Three waterbodies (Pond P1, P2 and P3; Figure 4) exist within 250m of the Site. Access to Pond P3 was not obtained and therefore a HSI survey or presence/ absence surveys could not be carried out. Pond 3 is approximately 241m Southwest of the Site.

4.3.1.2 Pond P1: Permanent waterbody (approximately 685m²) (Plate 6) located within the wider landownership. Surface water partially covered with Common duckweed *Lemna minor*. Pond located amongst mature trees and shrubs, which shade out 80% of the pond. Marginal plants include Bittersweet (*Solanum dulcamara*), Cuckooflower (*Cardamine pratensis*), Filamentous Algae (various genera), Meadowsweet (*Filipendula ulmaria*), Pendulous Sedge, Soft Rush, Willow species (*Salix* spp.), and Yellow Flag Iris. No GCN were recorded in this pond during the 2020 GCN population surveys.

4.3.1.3 Pond P2: Permanent waterbody (approximately 425m²) (Plate 7) located outside landownership. Pond located amongst mature oak trees and shrubs, which shade out 60% of the pond. Marginal plants include Meadowsweet, Rush sp. (*Juncus spp.*), Willow species (*Salix* spp.) and Yellow Flag Iris. During the 2020 GCN population surveys, a maximum peak count of 3 GCN individuals, both male and females, and 1 GCN egg were recorded within this pond. GCN populations are classed into population size; small: 1-11 individuals, medium: 11-100, large: 100+ (Langton, 2001), therefore, this pond had a small sized, breeding population of GCN in 2020.

4.3.1.4 An EDNA survey of Pond 1 and Pond 2 was also carried out in 2022. A negative result was returned for Pond 1 and positive result for Pond 2.

4.3.1.5 Ponds P1 and P2 received an up-to-date HSI score in 2026 as found in Table 3 below.

Table 3. Habitat Suitability Index Scoring

Pond Number	HSI Score	Pond Suitability	Proximity to development	Connectivity to proposed development
Pond P1	0.79	Good	60m northeast	No barriers to dispersal
Pond P2	0.76	Good	190m northwest	No barriers to dispersal
Pond P3	-	-	240m southwest	No barriers to dispersal



Figure 4. Aerial map showing all waterbodies within the 250m of the Site.

Table 4. GCN Presence/Absence and Size Class Survey were carried out as follows.

Date	Pond		Weather			Vegetation cover		Turbidity	
	P1	P2	Air temperature (P1/P2)	Rain (0-5)	Wind (0-5)	P1	P2	P1	P2
30/04/2026	X	X	14°/14°	0	0	2	0	1	2
05/05/2026	X	X	13°/13°	0	0	2	0	1	2
14/05/2026	X	X	8°/8°	1	1	3	1	2	3
21/05/2026	X	X	17°/17°	0	1	2	0	2	3
04/06/2026		X	14°	0	0	NA	1	NA	2
11/06/2026		X	15°	0	0	NA	1	NA	2

4.3.1.6 GCN were not recorded in Pond 1. GCN were recorded in Pond 2 with a max peak count of 1 individual on separate nights; both male and female individuals were identified but no eggs were found during the surveys. This equates to a small GCN population. Full results in Tables 5 and 6 below.

Table 5. Summary GCN results for Pond 1.

Date	GCN	Smooth newt	Palmate newt	Frog/toad	Eggs
30/04/2026	**0**	3	0	1	No
05/05/2026	**0**	8	0	0	No
14/05/2026	**0**	4	0	0	No
21/05/2026	**0**	4	0	1	No

Table 6. Summary GCN results for Pond 2.

Date	GCN	Smooth newt	Palmate newt	Frog/toad	Eggs
30/04/2026	**0**	5	0	0	Smooth
05/05/2026	**1f**	2	0	0	Smooth
14/05/2026	**0**	2	0	0	Smooth
21/05/2026	**1m**	1	0	0	No
04/06/2026	**0**	1	0	0	No
11/06/2026	**0**	0	0	0	No

4.3.2 *Reptiles*

4.3.2.1 Habitats within the Site do potentially provide suitable habitats that could be used by reptiles including areas of concrete for basking and areas of timber and logs also for basking and refuge. However, it is considered that reptiles will not be present within the Site because the Site is isolated from other suitable reptile habitat within the wider landscape by substantial areas of arable farmland and dense woodland blocks, which reptiles will not readily traverse, and the amount of daily human disturbance through yard access and machinery movements, will deter reptile use of the Site.

4.3.2.2 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 and will not be considered further within this Appraisal.

4.3.3 *Bats*

4.3.3.1 One mature Ash tree and no structures exist within the Site. All trees within an area to the east of the Site and within the wider landownership to the East were subject to a Potential Roost Assessment, Bat Activity Survey and Bat Back Tracking Survey in 2020. During the Potential Roost Assessment in 2020, 12 trees appeared to be sited within what is now the current redline boundary, these were assessed for potential bat roost features. Of these 12 trees, 1 was categorised as having a high roost potential, 5 moderate potential and 6 low potential. It is clear these tree GPS locations were only approximate locations and the +/- error of GPS points has affected their accuracy as the survey data from 2020 does not align with the current satellite imagery, nor does it record the ash tree that is currently still on site. Further, it is also most unlikely that trees of any significance would have been able to grow on the concrete area. It is most likely these trees are within the woodland area to the East of the Site. However, as a precautionary measure, compensation for the absence of these trees has been accounted for in the impact assessment and the compensations measures suggested.

Ground Level Tree Assessment

4.3.3.2 One tree exists within the Site (T9). All trees along the perimeter of the Site (T1 – T8) were assessed for their suitability for bats (Table 7). Upon investigation, four trees have been identified as having potential bat roost features. All potential roost features were categorised as PRF-I, indicating they are only suitable for an individual or very small numbers of bats. (Figure 5). Appendix A2 contains photos of all trees with PRFs.

Table 7: All trees identified within the redline boundary assessed for their suitability for bats.

Tree Number	GPS Coordinates		Tree species	Description of Tree/PRF	GLTA PRF category
	Easting	Northing			
T1	341312	339357	Oak Hybrid	A branch has broken off, and possible cavity exists in remaining branch end, however, the cavity is upwards facing so water ingress from rain makes it unsuitable for bats	Negligible
T2	341311	339363	Field maple	No potential bat features present.	Negligible
T3	341311	339370	Oak Hybrid	Broken branch has been manually cut off, and possible cavity exists in remaining branch end, however, the cavity appears too shallow to support roosting bats.	Negligible
T4	341313	339377	Oak Hybrid	Two potential roost features present; lifted bark around old damage to branch in two locations	PRF-I
T5	341310	339383	Oak Hybrid	Old branch tear out but no opening into branch to support roosting bat.	Negligible
T6	341305	339403	Oak Hybrid	Three potential roost features but all ruled out due to all cavities appearing too shallow to support bats.	Negligible
T7	341311	339414	Common ash	Three potential roost features; one ruled out due to cavity receiving weather ingress. Two remaining features include Ivy cover and partially healed wound with cavity under associated callus roll.	PRF-I
T8	341320	339421	Common ash	Multiple rot holes (~5) from broken branches around tree creating cavities of various sizes and depths, that could be used by roosting bats.	PRF-I
T9	341349	339400	Common ash	Dead tree covered in ivy that could be obscuring potential features, also lifted bark present that could support roosting bats.	PRF-I



Static bat detectors

4.3.3.3 The static bat detectors were placed around the Site between 21/05/26 and 11/06/26 (21 nights). Over 22,852 bat calls were recorded over this period from 8 different species including Lesser horseshoe bat, Soprano pipistrelle, Common pipistrelle, Brown long-eared, Noctule, Natterer's bat, Daubenton's bat and Whiskered/Brandt's bat. Results are summarised in Tables 8 and 9 and Figures 6 and 7 below.

4.3.3.4 Bat calls were recorded throughout the night and across the entire deployment period which suggests that the Site in its current condition, i.e. open area within woodland block, is a valuable foraging resource for local bats. Very small numbers of bat calls were recorded of Lesser Horseshoe bats, brown long eared and the myotis species (total number of combined passes of these species was 76 from static 1 out of 14,414 and 92 out of 8,438 calls from static 2. By far the largest number of passes was by common pipistrelle and soprano pipistrelle with Noctule accounting for a smaller proportion

Table 8: Total number of bat calls recorded on static 1, each night throughout the static bat detector deployment period, separated by bat species.

Date	Mbra/ Mmys	Mdau	Mnat	NSL	Paur	Ppip	Ppyg	Total
22/05/2026	6	2	0	10	0	582	404	1004
23/05/2026	4	0	0	6	2	116	170	298
24/05/2026	0	0	0	6	0	256	96	358
25/05/2026	0	0	0	14	0	372	50	436
26/05/2026	6	0	0	4	2	494	86	592
27/05/2026	4	2	0	10	0	816	96	928
28/05/2026	2	0	0	28	2	590	102	724
29/05/2026	0	0	0	26	0	338	56	420
30/05/2026	2	0	0	10	4	1092	108	1216
31/05/2026	0	0	0	18	0	1270	106	1394
01/06/2026	14	10	0	6	0	748	156	934
02/06/2026	0	0	0	6	0	580	126	712
03/06/2026	0	0	0	8	0	436	222	666
04/06/2026	0	0	0	10	0	552	310	872
05/06/2026	0	0	0	2	0	602	212	816
06/06/2026	2	2	2	4	0	388	120	518
07/06/2026	0	2	0	0	0	488	100	590
08/06/2026	0	0	0	0	0	334	60	394
09/06/2026	0	0	0	2	0	160	32	194
10/06/2026	0	0	0	2	0	672	162	836
11/06/2026	0	0	0	4	0	408	100	512
TOTAL								14414

Table 9: Total number of bat calls recorded on static 2, each night throughout the static bat detector deployment period, separated by bat species.

Folder	Mbra/ Mmys	Mdau	Mnat	NSL	Paur	Ppip	Ppyg	Rhip	Total
22/05/2026	6	0	0	6	2	92	248	0	354
23/05/2026	8	2	2	2	4	154	362	0	534
24/05/2026	4	0	0	4	8	42	156	0	214
25/05/2026	2	2	0	4	2	52	142	0	204
26/05/2026	6	4	0	2	0	58	222	0	292
27/05/2026	0	0	0	6	8	42	258	0	314
28/05/2026	2	2	0	10	0	100	320	0	434
29/05/2026	2	2	0	14	2	154	326	0	500
30/05/2026	2	0	0	6	2	132	300	0	442
31/05/2026	0	0	0	10	2	130	402	0	544
01/06/2026	0	2	0	2	2	38	650	2	696
02/06/2026	0	0	0	2	0	60	334	0	396
03/06/2026	2	4	0	6	4	1546	850	0	2412
04/06/2026	0	0	0	0	0	16	92	0	108
11/06/2026	0	0	0	0	2	504	486	2	994
TOTAL									8438

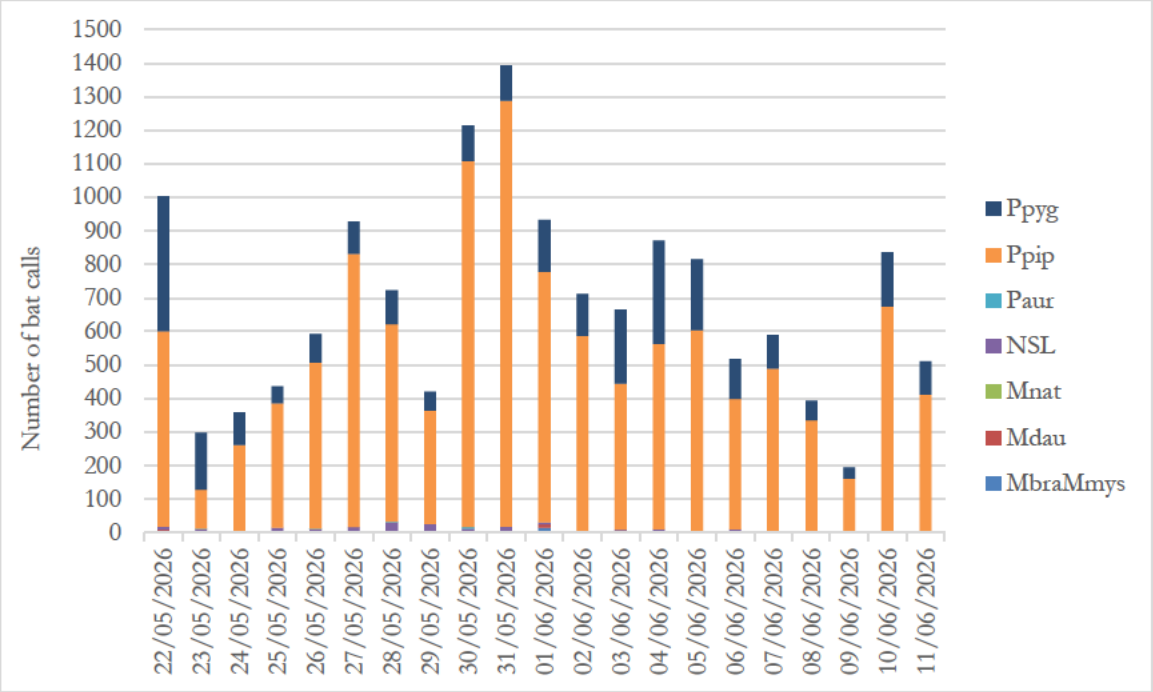


Figure 6. Number of bat calls recorded on Static bat detector 1, located on T4, between 21/05/26 and 11/06/26. Bat species have been separated into Ppyg = Soprano pipistrelle, Ppip = Common pipistrelle, Paur = Brown long-eared, NSL = Nyctalus/Cnephaeus, Mnat = Natterer's bat, Mdau = Daubenton's bat and MbraMmys = Whiskered/Brandt's bat.

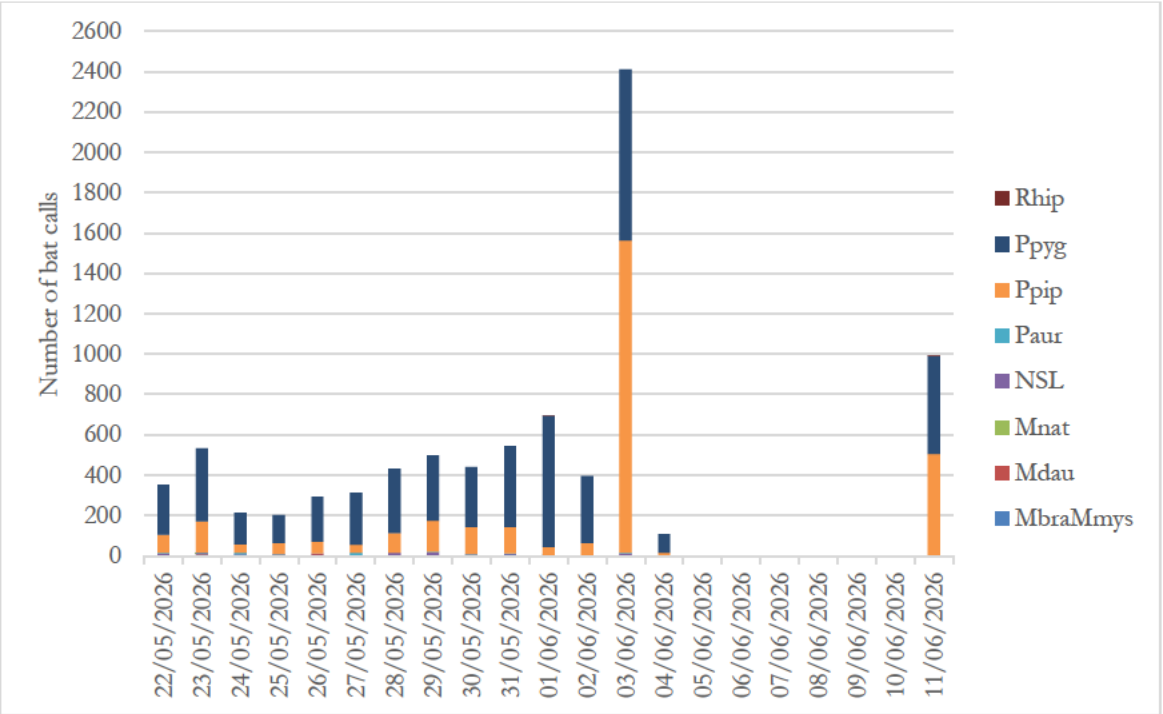


Figure 7. Number of bat calls recorded on Static bat detector 2, located on T9, between 21/05/26 and 11/06/26. Bat species have been separated into Rhip = Lesser horseshoe, Ppyg = Soprano pipistrelle, Ppip = Common pipistrelle, Paur = Brown long-eared, NSL = Nyctalus/Cnephaeus, Mnat = Natterer's bat, Mdau = Daubenton's bat and MbraMmys = Whiskered/Brandt's bat.

4.3.4 [redacted]

[redacted]

4.3.5 *Otter*

4.3.5.1 No evidence of otter use was recorded within the Site. Habitats on Site do not provide opportunities for otter to shelter, due to the lack of dense vegetation, or forage, due to the lack of watercourses, ponds or wet features, as well as the frequent human disturbance from business use.

4.3.5.2 The wider land ownership provides continuous woodland/scrub cover and unrestricted access to the brook 280m south of the Site, as well as access to low quality feeding grounds within Pond P1 and P2. Otters are known to travel great distances and as the woodland adjacent to the Site could support sheltering otter, otter may traverse or commute through the Site and therefore transient otter presence cannot be completely ruled out. It is highly unlikely holts, particularly natal holts would be present due to the lack of a close by good foraging watercourse. As such otter will not be considered further within this Appraisal.

4.3.6 *Water vole*

4.3.6.1 No suitable watercourse was found within, or adjacent to the Site. The ponds do not provide the habitat required for even small populations of water vole due to shallow banks, lack of marginal vegetation and their isolation from watercourses/waterbodies with known water vole populations. The nearest potentially suitable watercourse is located approximately 280m south of the Site. Water vole are semi-aquatic and forage, burrow and breed within riparian vegetation up to 2-5m from the water's edge (Strachan et al., 2011). Water voles will not ordinarily travel across open ground for more than 10m, therefore, no opportunities for water vole are present on site and the ongoing works will have a negligible impact of water vole. Water vole will not be considered further within this Appraisal.

4.3.7 *Birds*

4.3.7.1 Opportunities for nesting birds within the Site are minimal but include within timber piles and temporary storage structures present for opportunistic species such as robin *Erithacus rubecula*, wren

and pied wagtail *Motacilla alba yarrellii*. The bund also provides opportunities for some ground nesting bird species such as wren or pied wagtail. Due to presence of this potential bird nesting habitat onsite, a precautionary approach should be taken with regards to nesting birds during the ongoing use of the Site.

4.3.8 *Invasive Species*

4.3.8.1 No legislated invasive species, or evidence of, were found within the Site, however, several small stands of Japanese knotweed (*Fallopia japonica*) are present within the wider landownership that are regularly treated by the landowner. Stand 1 is located at SJ 41246 39330 and is approximately 2m2 and a single plant was seen at SJ 41349 39234.

4.4 Site Conditions Prior To Clearance In 2019

4.4.1 Although it is not possible to know for certain what the habitats were within the Site prior to its clearance in 2019, it is possible to come to some conclusions about the likely habitats that would have been present based on aerial imagery and adjacent habitats found within the wider land ownership. In particular, any areas of the wider land ownership that share similar conditions to those found onsite such as expanses of concrete slabs that still remain within the wider area would likely share habitats to those lost within the Site.

4.4.2 The Site is the largest expanse of concrete that existed within the hospital due to it being the vehicle service yard. Trees or woodland habitat would not have grown upon it for many years once it became unoccupied because the leaf litter and mulch would not be present for seed germination and tree survival. The concrete remaining does not show any signs of significant damage by roots of mature trees.

4.4.3 It can be assumed with reasonable certainty that significant mature trees did not exist within the concrete footprint of the Site prior to its clearance. The vegetation that was likely present would have been comparable to what is present on other concrete pads within the Site and include a deep layer of leaf litter with ruderal species growing upon it with some small scrub species or small trees also present such as those listed in paragraph 4.2.2 and 4.2.3. Some of which may have fallen due to unsecure roots on top of the concrete pad. It is probable that areas around the edge of the yard comprised dense thickets of vegetation. Anecdotally, large amounts of fly tipping occurred in this area due to it being the largest open area and access being easy from Tudor Drive.

4.5 *Ecological Value*

4.5.1 The Site prior to its clearance would have had some wildlife value; the exact amount cannot be known but taking a precautionary approach the following habitats may have been lost.

4.5.2 GCN: Habitat suitable for GCN foraging, sheltering and overwintering was likely present within humous layer, tree roots, scrub, brash piles and dead wood and has now been lost. Due to the distance of the Site being greater than 190m from a known GCN population in Pond P2, and the presence of excellent foraging, sheltering and overwintering habitat immediately adjacent to Pond P2, GCN are unlikely to commute the distance to the Site from Pond 2 and therefore, the Site likely did not support a population of GCN, however, their presence prior to site clearance cannot be ruled out.

4.5.3 Reptiles: Prior to clearance, the Site would have been unsuitable for reptiles. The Site would have resembled the closed tree canopy and dense ground vegetation cover of the wider woodland sited on the hospital footprint, which are unsuitable habitats for reptiles to bask or forage. Little light would penetrate to the ground, except in small clearings, isolated from other potential reptile populations in the wider landscape, therefore, there is no reason to believe the Site would have provided anything different or more beneficial to reptiles.

4.5.4 Bats: No buildings or structures existed on Site and due to the extensive concrete footprint of the Site, no mature trees would have likely been present within the Site, that would have supported any significant potential bat roost features. The larger trees that remain in 2026 would have been present around the periphery of the redline boundary where the concrete base does not extend. The aerial image (Figure 3) from 2018 does not show large canopies of trees along the length of the bund and canopies evident in 2018 to the south of the yard, between the yard and track, are still present in recent aerial imagery (Figure 1).

4.5.5 Smaller trees can provide limited roosting opportunities for bats, and these may have been present. It is likely that if roosting features did exist within any smaller trees within the Site, then these would only be suitable for individual bats and low conservation status roosts and would have formed a small part of a larger networks of roosts within the wider woodland.

4.5.6 Badger: The hardstanding footprint of the Site would provide no opportunities for badger to create setts and latrines. The woodland habitat surrounding the Site would have still provided better foraging and sheltering opportunities for badger, however, the layer of topsoil and humous removed from the concrete could have been used for foraging. The Site was likely used for foraging or commuting badger, however, the Site remains accessible to badger for commuting post-clearance works albeit across poorer quality habitats.

4.5.7 Otter: The hardstanding footprint of the Site would provide no opportunities for otter to create dens or holts. The continuous vegetative cover, that likely existed on Site, and the unrestricted access to the brook 280m south of the Site, means that otter, if present in the area, may have traversed the Site, however, because of the extensive concrete footprint throughout the Site limiting

vegetation growth, even prior to the Site clearance, the proportion of vegetation removal in relation to the wider woodland block was minimal.

4.5.8 Water vole: Prior to clearance, the Site would have been unsuitable for water vole. The Site would have resembled the close tree canopy and dens ground vegetation cover of the wider woodland which are unsuitable habitats for water vole to forage or shelter, without a waterbody or watercourse. The Site remains isolated from other potential wate vole population on the brook, 280m south, or the neatest pond P1 60m north, and because water vole are unlikely to travel more than 10m from desirable habitat across undesirable habitat, there is no reason to believe the Site would have provided anything more beneficial to water vole.

4.5.9 Birds: Any trees, scrub and areas of dense vegetation lost through the clearance of the Site would have provided good nesting and/or foraging habitat for a variety of bird species. Opportunities for woodland, understory and edge bird species such as owls, corvids, pigeons, tits, finches, thrushes' robins and wrens would likely have been present. However, because of the extensive concrete footprint throughout the Site limiting vegetation growth, even prior to Site clearance, the proportion of vegetation removal in relation to the wider woodland block was minimal.

5.0 APPRAISAL OF POTENTIAL EFFECTS

5.1 This section provides an appraisal of the potential effects of the continued use of the yard on protected habitats and species. The change of use of an area of concrete hardstanding to a timber and machinery storage yard has included the following works to date; ground clearance works i.e. scraping humous layer and vegetation from the concrete to facilitate vehicle access and a working area. Scrub/ small tree clearance works i.e. felling of very few dangerous, windblown and caught-up trees, to maintain public safety has also been carried out and the creation of a large bund on the South and Eastern boundaries.

5.2 Future works will include those relevant to operating a tree services business including storage of timber and machinery. The yard will also be used to process timber for firewood using tractors and mechanised splitting equipment. No further expansion of the yard is anticipated and no increase in use or activities is planned. The level of use during the past 6 years is as it will be for future years.

5.3 *Designated Sites*

5.3.1 Part of the Site is part of an area of approximately 500m² of registered Ancient Semi Natural Woodland (ASNW). The boundary of the ASNW area appears to cover only the access track within the redline boundary and therefore, trees within this ASNW area may have been felled to maintain the access track through the woodland.

5.3.2 Following the desktop and field surveys, there is an argument to the inaccurate categorisation of the ASNW and that the woodland as a whole should not be considered an ancient woodland as mature trees have only been present since the late 1900s. Shields Arboricultural Consultancy Arboricultural Impact Assessment (AIA) dated 24/02/2026 and submitted to Wrexham County Borough Council under planning application ref: P/2026/0085, also states that "*Over recent decades the wider site has undergone natural succession, resulting in the establishment of secondary broadleaved woodland dominated by self-seeded Sycamore (Acer pseudoplatanus), with scattered Ash (Fraxinus excelsior), Goat Willow (Salix caprea), Elm (Ulmus spp.) and occasional Oak (Quercus robur). The stand is even aged and structurally uniform, and in many locations trees are growing over remnant hardstanding and buried infrastructure that constrain rooting depth and compromise stability. Consequently, the woodland represents a post-developed landscape feature of comparatively low arboricultural quality*." This independent assessment of the woodland within the Site and wider landownership does not coincide with the ancient woodland categorisation.

5.3.3 This potentially inaccurate categorisation of the woodland would reduce the impact of removal of trees along the track. Given the results of the 2026 Arboricultural Impact Assessment, it is assumed that the tree clearance works and future tree services business works will have no detrimental impact on the status of the woodland.

5.3.4 The Site also exists within the two designated sites, Isycoed/Maelor Special Landscape Area (SLA) and Llanerch Panna Local Wildlife Site. The designation of the SLA applies largely to lowland farmland, estate parkland and historic medieval settlement features, none of which are situated within the Site or wider landownership. The wider landownership boundary consists of woodland, which is included within the SLA designation, however, the Site does not currently support any woodland habitat. Reference to the cultural characteristics of Penley Polish Hospital and Polish heritage around Penley will not be impacted by the future business use of the Site as the former campus-style hospital and staff accommodation has already been demolished within the wider landownership, before the current ownership, and the Site is actively being reclaimed by nature. The use of the Site as a timber and storage yard makes use of the existing concrete footprint of the former vehicle yard of the hospital complex and future business activities will not extend past the concrete footprint of the Site. The future use of the Site for a local, small, arborcultural business does not involve works to the wider woodland, altering the wider landscape or changing the rural characteristics of the land, therefore, the proposed works will not impact the SLA.

Habitats

5.3.5 Future Site use will be restricted to the concrete footprint of the Site. No habitat loss is anticipated to facilitate future Site use as a small, arboricultural business yard. The vegetated bund will be left undisturbed and in situ to provide a noise and visual buffer to the yard. One mature Ash tree (T9) is due to be removed/pollarded, as the tree is completely dead, located on the edge of the concrete footprint i.e. edge of working yard and poses a public safety risk. To mitigate the potential loss of this tree, the tree will be de-limbed and pollarded, and dead wood left standing, to be maintain its ecological value on Site if possible.

5.4 *Great Crested Newt*

5.4.1 No GCN are present in Pond 1 in 2020, 2022 (EDNA) or 2026. GCN presence on Site is highly unlikely due to the distance of the Site from Pond P2 (known small population of GCN in 2020 and 2026). GCN are known to stay within their core habitat surrounding a breeding pond if the habitat present is of good enough quality to sustain them. In summary, why would they exert energy traveling further from their breeding pond if suitable habitat for foraging and shelter and hibernation exist close by to it. It is considered that habitat surrounding Pond 2 is of such high quality consisting of mature woodland with large amounts of fallen dead wood and field margins that they would not travel 190m to the Site which is of poorer habitat quality. Habitats suitable for GCN on Site are very minimal and only include timber/log and brash piles accessed by crossing areas of concrete, where GCN can shelter and/or hibernate. The future use of the Site will not alter or impact Pond P2 and no works will take place to this pond, or any pond within 250m of the Site, therefore, the arborcultural business activities will negligibly effect GCN. However, a

precautionary approach to deterring individuals from entering Site in the future should be taken to mitigate the impact on GCN in the future. Precautionary measures will be detailed in Section 6.

5.5 *Bats*

5.5.1 Four trees with potential roost features were located either in the redline boundary, or within 5m. One of these trees, T9, is due to be removed as it is completely dead and poses a health and safety risk to personnel. Without mitigation, the removal or pruning of this tree may injure and kill a bat and therefore, a precautionary approach should be undertaken when works to this tree take place. No works are due to take place to the remaining three trees with potential roost features. They are all located on the periphery of the existing yard, therefore, any noise, dust, or vibration disturbance to potential roosting bats within these perimeter trees will be in line with current yard activities and therefore within the tolerance levels of local individuals.

5.5.2 The Site acts as a clearing within the existing woodland of the wider landownership. Many local bats species are woodland edge specialists when foraging, therefore, the Site is a useful and important resource for local bats in its current condition and is used extensively by bats. As shown by the number of bats calls recorded during the static bat detector deployment. No further works to the adjacent woodland is anticipated that would impact bats. No electricity feed is present in the yard and as such no external lighting is present. No additional lighting is planned.

5.5.3 Overall, the impact of future arborcultural business use on bats will be low and its continued use and maintenance as a clearance within the woodland will have a benefit to bats as it provides a significant foraging resource.

[redacted]

5.7 *Otter*

5.7.1 The Site has negligible potential for otters as suitable habitats are located on Site. No works are anticipated to any watercourse or pond within the wider landscape that may be used by otter. The Site is potentially used by commuting otter but as future use of the Site will not exclude otter and it will not increase, the impact of the ongoing arborcultural business activities on otter is negligible as it.

5.8 *Birds*

5.8.1 The majority of habitats within the Site, such as hardstanding, are not suitable for nesting birds. Only habitat in the form of log and brash piles provide nesting opportunities. Arboricultural guidance and forestry best practice for the management of timber stacks within the breeding bird season must be followed. It is considered if best practice methods including those detailed in section 6.4.27 the continued use of the site for business at its current level on nesting birds will be minimal.

Appraisal of impacts from the clearance of the Site in 2019

5.9 In order to appraise the impacts of an action the value of a site prior and post works needs to be determined. This has been completed in section 4.4. and is summarised as follows. Prior to the clearance in 2019 the Site offered limited floristic value and nothing notable in its species composition as can be seen from similar habitats within the wider woodland that share very similar characteristics to the Site. No mature trees would have been present on top of the concrete base, some smaller trees may have grown on the periphery of the concrete on the south and east aspects and these have been cleared to provide space for the bund. It is also likely that some of these trees may have fallen and created thickets and dense areas of vegetation.

5.10 Ecological value was likely limited to areas of dense scrub and thicket that would provide suitable nesting habitats for birds as well as large areas of leaf litter that would have provided habitat for amphibians, hedgehog and a wide range of invertebrates. Any smaller trees on the periphery would not of been a size that would likely provide features suitable for high status bat roosts such at maternity roosts but may have provided features for individual bats. A foraging value to bats and birds of the Site prior to clearance would have been present also. This is not quantifiable but undoubtedly existed in some form. The site would also have had some foraging benefit to badgers also, the leaf litter would have provided foraging opportunities for worms, slugs and other invertebrates etc.

5.11 Following the clearance work in 2019 the site is summarised as providing no floristic value as it has all been removed. the bund is vegetated with ruderal species which do have some limited ecological value to insects. The Site is predominantly concrete which has negligible ecological value. The log piles that are present do provide some nesting opportunities for birds but are prone to disturbance by activities within the yard that may make them less valuable. Due to the clearance of the site, in essence, a glade has been created within a woodland block. Glades are a valuable habitat within a woodland ecosystem as they provide niche habitats that would not otherwise be present. The area within a glade warms up more than the surrounding woodland and this attracts insects which in turn attracts other predators. The warm microclimate of the glade may also benefit the edge

habitats by increasing light levels and allow other floristic species to germinate on the margins of the site.

5.11.1 Habitat that was lost is abundant across the wider landownership and was limited to areas of "secondary broadleaved woodland dominated by self-seeded Sycamore" (SAC, 2026). For the full impacts of woodland loss through Site use, read the 2026 AIA, however, to summarise, "*the woodland represents a post-developed landscape feature of comparatively low arboricultural quality. While it provides some localised visual screening, it offers limited broader landscape, ecological or public amenity value in its unmanaged condition and is likely to decline further in structural integrity and function without active management*."

5.12 *GCN*

The habitats on site prior to clearance would have been of a higher value to GCN than post clearance because they would have consisted of humous layer and leaf litter and roots and dead wood and ground vegetation. All of which can be seen still present on adjacent concrete pads. It is also noted that GCN surveys in 2020 and 2026 and EDNA survey in 2022 did not identify a GCN population in Pond 1 some 60m distant from the Site. A small population of GCN was identified in Pond 2 in 2020, 2022 and 2026. Pond 2 is 190m distant from the Site. Although it can not be ruled out completely it is considered that the likelihood of GCN being present on the site in 2019 is low due to the distance from the breeding pond individuals would have to travel to get to site and that this route would be across good foraging and resting habitat. It is considered that the clearance of the Site in 2019 has had a negligible impact on the small population of GCN in Pond 2 and no impact locally or regionally.

5.13 *Bats*

No mature trees with PRF have been lost through the clearance, some small trees may have been lost that may have had PRFi features. The habitats on site currently are of low conservation value to bats but the creation of an opening within the woodland provides an increased ecological value to what was present in 2019. An open warm 'glade' provides excellent foraging opportunities for a range of bat species as shown by the number of passes and range of species using the glade during the static bat detector deployment. It is considered highly likely that this number or species range would not be present prior to the clearance of the Site. It is considered likely that the clearance of the Site in 2019 would have had a positive impact on bats within the woodland and no impact locally or regionally.

[redacted]

Birds

5.15.1 Habitas present prior to the clearance work would be of higher quality to those currently. Although some nesting habitat remains within vegetation along the bund the majority has been lost. A negative impact on availability of resources for nesting birds has resulted from the clearance of the Site.

5.15.2 The wider woodland has a large amount of the same habitat that was cleared in 2019. Within the wider woodland the clearance of the nesting habitat from site would have a negligible impact on availability of habitat suitable for nesting birds and no impact locally or regionally.

6.0 DISCUSSION AND RECOMMENDATIONS

6.1 The site at Land West of Tudor Drive, Penley has been subject to a Preliminary Ecological Appraisal (PEA), which consists of a Desk Top Survey and a Field Survey conducted on 30th April 2026. As part of the Field Survey, a GCN Habitat Suitability Index survey was undertaken.

6.2 The Site was searched for evidence, or habitat that could potentially be used by protected species: great crested newts, reptiles, bats, badgers, otters, water vole and nesting birds. No evidence of protected species, and only habitat suitable for GCN, bats and nesting birds was found on Site.

6.3 An estimation of the habitats on Site prior to clearance in 2019 has been assessed. The Site likely supported habitats suitable for GCN, bats, badgers and nesting birds, including small trees, brash and general woodland debris. Compensation for the loss of this habitat for these species will be required.

6.4 Survey Recommendations

6.4.1 No further surveys are recommended in relation to any protected species or habitats. It is considered that a full understanding of what the Site was like prior to clearance in 2019 and now and an appropriate Impact Assessment has been made.

6.5 Mitigation Recommendations

6.5.1 *Compensatory Habitats and Enhancement*

6.5.1.1 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. To compensate for loss woodland and scrub on site, a Green Infrastructure Statement and Net Biodiversity Benefit Plan dated 20/02/2026 has been produced and is appended to this Appraisal (Appendix 3). These are summarised below

- Barn owl box positioned within a mature oak tree on the northern boundary of the wider site. Facing out on to the fields. The box will be of the design recommended by the Barn Owl Trust.

- Installation of six bat boxes within the woodland in the northwest corner of the wider site (blueline boundary). These will be situated at least 4m in height and positioned two per tree facing south and west with a clear flight path into them. Boxes will consist of x3 Schweglar 2F bat boxes with internal baffle and x3 Schweglar general purpose bat boxes
- Installation of six small bird habitat boxes within the woodland in the northwest corner of the wider site (blueline boundary).

6.5.1.2 It is considered that a full understanding of the impacts associated with the continual use of the site on protected species and habitats and the impacts of the loss of habitats through the clearance of the Site in 2019 have been assessed. The following mitigation measures and recommendations are proposed to address these impacts. Enhancement measures are proposed to be installed within the wider landownership area as opportunities within the Site do not exist. The below recommendations are in addition to those detailed within the NBB Plan.

6.5.2 *Designated Sites/Habitats*

6.5.2.1 One tree T9 is due to be removed as it poses a public safety risk. No other scrub or vegetation is due to be lost as part of the ongoing arborcultural business activities. The trees, scrub and vegetation lost on Site through clearance in 2019 make up a small proportion of the adjacent non-native woodland, the wider Special Landscape Area and Local Wildlife Site, and therefore, retrospective mitigation and compensation is required.

Recommendation 1

6.5.2.2 Trees are not to be lit during the ongoing tree service business activities at the Site.

Recommendation 2

6.5.2.3 All rubbish will be placed in skips with lids, to prevent rubbish, and refuse blowing across the wider woodland, and any fuel/oil stored on site will be in appropriate bunded containers following best practice guidelines when on Site.

Recommendation 3

6.5.2.4 A Root Protection Area (RPA) will be established around the trees along the Site boundary in accordance with guidance document BS 5837:2012. This will be in effect if any works take place outside the concrete footprint of the Site to ensure that trees are not accidentally damaged and that root systems are protected from compaction, excavation, or disturbance during future Site use. This include the storage of timber on the root plates of trees

Recommendation 4

6.5.2.5 Works to T9 will include de-limbing and/or pollarding the tree to maintain as much standing dead wood as possible, without endangering human life. This will maintain the trees ecological value on Site by retaining potential roost features.

6.5.3 *Great Crested Newt*

6.5.3.1 Although GCN are considered likely absent from the site it is proposed that future activities are done so in a way that further reduces the value of the Site to GCN which further reduces the chances of individuals being present within the Site.

Recommendation 1

6.5.3.2 Storage of all materials, including log piles and brash will be raised off the ground a minimum of 100mm e.g. on pallets or logs to reduce refuge opportunities beneath them

6.5.3.3 The location of log and brash piles will be positioned centrally within the yard to maintain a perimeter of clear concrete around it

6.5.3.4 The perimeter of concrete will be maintained clear of debris to keep it 'unattractive' to GCN to traverse.

Recommendation 2

6.5.3.5 Currently the Site provides refuge features for GCN in the form of log piles. It is proposed that these feature are removed to make the site less suitable to GCN. It is recommended that a precautionary Reasonable Avoidance Method Statement be created and followed by the Client to ensure that the works do not result in the disturbance, injury or killing of GCN. No GCN license is required for this work as it is considered highly likely that GCN are not present within the Site as described in section 5.5.1. The proposed RAMS may include the below and should be adhered to before and during construction works.

6.5.3.6 Summarised Reasonable Avoidance Measures:

- Prior to the commencement of works a toolbox talk will be provided to onsite personal by a Natural Resources Wales 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.

- Log and timber piles, and any material currently stored on the ground on Site will be moved/raised with a suitably qualified ecologist present. This will be done so carefully and systematically without pushing or dragging of timber or logs.

- 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.

- If GCN are found during works, works must stop immediately, and the licensed ecologist will be contacted, and advice sought: Wildbanks Conservation; 01691 623505.

Recommendation 3

6.5.3.7 As an enhancement measure, it is recommended that a designated terrestrial refugia / hibernation feature suitable for great crested newts is created within the wider landownership beyond the northern end of the Site. It will be positioned centrally between Pond 1 and 2 so that it might provide future opportunities for population dispersal. The hibernaculum will be built in accordance with the Great Crested Newt Mitigation Guidelines (English Nature, 2001) and will be formed using a mixture of cut timber, brash, rocks and/or grubbed tree roots. These materials should be placed within an excavated pit measuring approximately 5m × 1 m × 0.3 m and then mounded to create a structure with a minimum height of 1m and capped with a layer of soil.

6.5.3.8 The dimensions provided represent a minimum specification and, where space allows, larger structures are preferable. The lower margins of the mound should remain partially exposed to facilitate access for GCN. The hibernaculum should be positioned in a sunny, well-drained location that is not prone to flooding. Where practicable, the structure should be orientated so that its longest edge (i.e. the 2 m side) faces south, maximising solar gain and thermal suitability.

6.5.3.9 The creation of a hibernaculum for GCN will provide an enhancement feature and increase the availability of terrestrial shelter and contribute to resilience for amphibians within the wider area.

6.5.4 *Bats*

6.5.4.1 One tree T9 is due to be removed as it poses a public safety risk, which has been assessed as supporting potential roost features suitable for individual bats. During Site clearance in 2019, it is estimated that a number of trees have either naturally fallen in storms or been felled/removed to facilitate the use of the yard and track within the redline boundary. To prevent harm to bats and their roosts and to maintain favourable conservation status of the species concerned the following recommendations should be followed.

Recommendation 1

6.5.4.2 One tree T9 is categorised as having a Potential Roost Feature (PRFi) that requires further investigation before any felling or pruning works. Any works to tree T9 should be undertaken under a Precautionary Work Method Statement (PWMS). This is non-licensable approach which assumes low bat potential and no evidence of bat use. The PWMS will include, but not be limited to:

- Toolbox talk by licensed ecologist will be undertaken prior to any works commencing.

- A detailed PRF internal inspection survey, or Aerial Tree Inspection (ATI), to assess their suitability for bats and to confirm the absence of roosting bats should be conducted prior to felling.

- If no evidence of bats is found during the ATI, works to trees should follow a 'Soft Felling' approach. A licensed ecologist or Accredited Agent will provide a watching brief during the works.

6.5.4.3 Aerial Tree Inspections may involve tree-climbing and/or ladders or MEWP, depending on the tree's location, PRF height and ground access.

6.5.4.4 If bats or evidence of a roost are identified during the ATI, all works must cease immediately, and advice should be sought from a licensed bat ecologist. A European Protected Species (EPS) licence, issued by Natural Resources Wales (NRW), may be required before any further works can proceed. No works affecting the roost may legally continue without this licence in place.

6.5.4.5 Providing no bat(s)/evidence of use by bats is found within Tree T9, a European Protected Species licence will not be required for demolition works. The works can be carried out at any time of year.

6.5.4.6 If any bats are found during works, works must stop immediately, and the site ecologist will be contacted, and advice sought: Wildbanks Conservation; 01691 623505.

Recommendation 2

6.5.4.7 To compensate for the loss of potential roosting provision on Site during the clearance in 2019, six tree veteranisation features should be created in trees T7 and T8 which are ash trees with level 3 ash die back. These will include boring features into the trunk of the tree that will develop to rot features that can be used by bats and cutting a section out of a tree approx. 750mm x 20cm and hollowing the back out and replacing the cut piece and securing it back in place. In addition to this pollarding of the trees will be carried out to prolong their life vertically.

Recommendation 3

6.5.4.8 A series of 4 bat boxes will be installed on trees within the wider landownership to provide additional compensatory and enhancement measures

Box Type	Photo	Box Type	Photo
One Schweglar 2FS large colony box		Three Vincent Pro bat boxes	

[redacted]

Recommendation 1

6.5.5.2 No installation of fencing is planned, however, if fencing is installed, it should remain open at ground level, e.g. post and rail, to maintain potential access to the Site for badgers or badger gates installed.

6.5.6 *Birds*

Recommendation 1

6.5.6.1 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

6.5.6.2 A tawny box will be installed on a suitable tree within the wider land ownership. The design of which will be that to replicate a hollow branch, and it will be installed on a suitable tree on the southern portion of the woodland with a clear flight path and approximately 5m in height. It will

be approximately 1m in length and 300mm x 300mm in size constructed of large or similar hard-wearing timber.

6.5.7 In summary the habitat provision to compensate for loss of habitats and enhancements for the continued use of the site for business is as follows.

- Nine bat boxes. Five Schweglar 1F with internal baffle, three Schweglar general purpose bat boxes, three Vincent Pro bat box and a large Schweglar 2FS bat box
- One hibernacular for GCN
- Six small bird habitat boxes
- One Barn Owl box
- One tawny owl box

7.0 REFERENCES

- ARG UK (2010). *ARG UK Advice Note 5: Great Crested Newt Habitat Suitability Index.* (At https://www.arguk.org/info-advice/advice-notes/9-great-crested-newt-habitat-suitability-index-arg-advice-note-5/file)
- CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal*, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Collins, J (ed.). 2023. *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)*. The Bat Conservation Trust. London.
- English Nature. (2001). *Great crested newt mitigation guidelines.* English Nature.
- Gent, A.H., & Gibson, S.D., eds. (2003). *Herpetofauna workers' manual.* 2nd Edition. Peterborough, Joint Nature Conservation Committee.
- Google. (2018). Satellite imagery of Tudor Drive, Penley, Wrexham, 52°56'52.74"N 2°52'32.87"W, eye alt 609m [Map]. Retrieved June 2, 2026, from https://earth.google.com/web/
- Institution of Lighting Professionals (ILP) (2023) Guidance Note 08/23: Bats and Artificial Lighting at Night. (at https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/)
- Langton, T.E.S., Beckett, C.L., and Foster, J.P. (2001). *Great Crested Newt Conservation Handbook*. Froglife, Halesworth.
- May, A. (2026) Email to Tanya Cobb, 8th July.
- Natural England (2001) *Great Crested Newt Mitigation Guidelines*. (At https://mokrady.wbs.cz/literatura_ke_stazeni/great_crested_newt_mitigation_guidelines.pdf)
- Shields Arboricultural Consultancy (SAC) (2026). *Arboricultural Impact Assessment*. Unpublished report on behalf of Mr James Sadowski.
- South Wales Wildlife Trust (2024) *Otter Protection: Best Practice Guidance for Developers, Ecologists and Planning Authorities (UK) Nov24.* (at https://southwalesottertrust.org.uk/wp-content/uploads/2024/11/att.-EHFMJiajzgYqupw5bgZARyss3TPFT6Ut-6LzRztnBc-1.pdf).
- Stanbury, A., *et al.* (2021). *The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for*

Great Britain. British Birds *114*: 723-747. (Available online at https://britishbirds.co.uk/content/status-our-bird-populations)

- Strachan, R., Moorhouse, T. & Gelling, M. (2011) *Water Vole Conservation Handbook* 3rd edition. Wildlife Conservation Research Unit, Abingdon.
- UKHab LTD (2023) *UK Habitat Classification Version 2.0* (at https://www.ukhab.org/)
- Wrexham County Borough Council (WCBC) (2007). *Wrexham Landscape Character Area Guidance*. Planning Department, Wrexham County Borough Council.

A1 APPENDIX – SITE PHOTOGRAPHS



Plate 1. General view of the Site showing stored timber, machinery and brash.



Plate 2. Western boundary of the Site showing mature, perimeter tree that may be affected by the works without mitigation.



Plate 3. Southern boundary of the Site, excluding the access track, showing the soil bund and subsequent vegetation cover.



Plate 4. Eastern boundary of the Site showing stored brash and machinery, and mature, perimeter trees that may be affected by the works without mitigation.



Plate 5. Northern boundary of the Site showing mature, perimeter tree that may be affected by the works without mitigation.



Plate 6. Pond P1



Plate 7. Pond P2

A2 APPENDIX – TREE PHOTOGRAPHS

Tree Number	Photograph	Potential Roost Features
T4 Oak Hybrid		  Lifted bark in both photos
T7 Common ash		 Partially healed wound with cavity under associated callus roll. Ivy cover shown in picture left.

Tree Number	Photograph	Potential Roost Features
T8 Common ash		   Multiple rot holes (~5) from broken branches around tree creating cavities of various sizes and depths.
T9 Common ash		Dead ash tree with some slightly raised bark

A3 APPENDIX - LEGISLATION AND PLANNING POLICY

A3.1 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.

A3.2 Great Crested Newts (GCN), otters, and all UK bat species are referred to as European Protected Species (EPS) under Regulation 43 of the Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

A3.3 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.

A3.4 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)".

A3.5 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.

A3.6 Species such as reptiles (Common Lizard, Slow Worm, Grass Snake and Adder), GCN, water vole, otters and bats (all UK species) are also protected in the UK under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended).

A3.7 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).

Bats

A3.8 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

A3.9 Badgers and their setts are protected under the Protection of Badgers Act 1992. Under this legislation 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.

GCN

A3.10 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.

A3.11 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

A3.12 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.

A3.13 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.

A3.14 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.

A3.15 The Birds of Conservation Concern (BoCC5) (Stanbury et al., 2021) is also taken into consideration when undertaking this appraisal.

A3.16 Technical Advice Note (TAN) 5: Nature Conservation and Planning (September 2009) provides the national planning framework for the consideration of protected species.

Hedgerows

A3.17 Under the Hedgerows Regulations 1997, it is against the law to remove or destroy certain hedgerows without permission from the local planning authority. In general, permission will be required before removing hedges that are at least 20 metres in length, over 30 years old and contain certain species of plant. The local planning authority will assess the importance of the hedgerow using criteria set out in the regulations.

Invasive Plants

A3.18 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.

A3.19 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

A3.20 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.

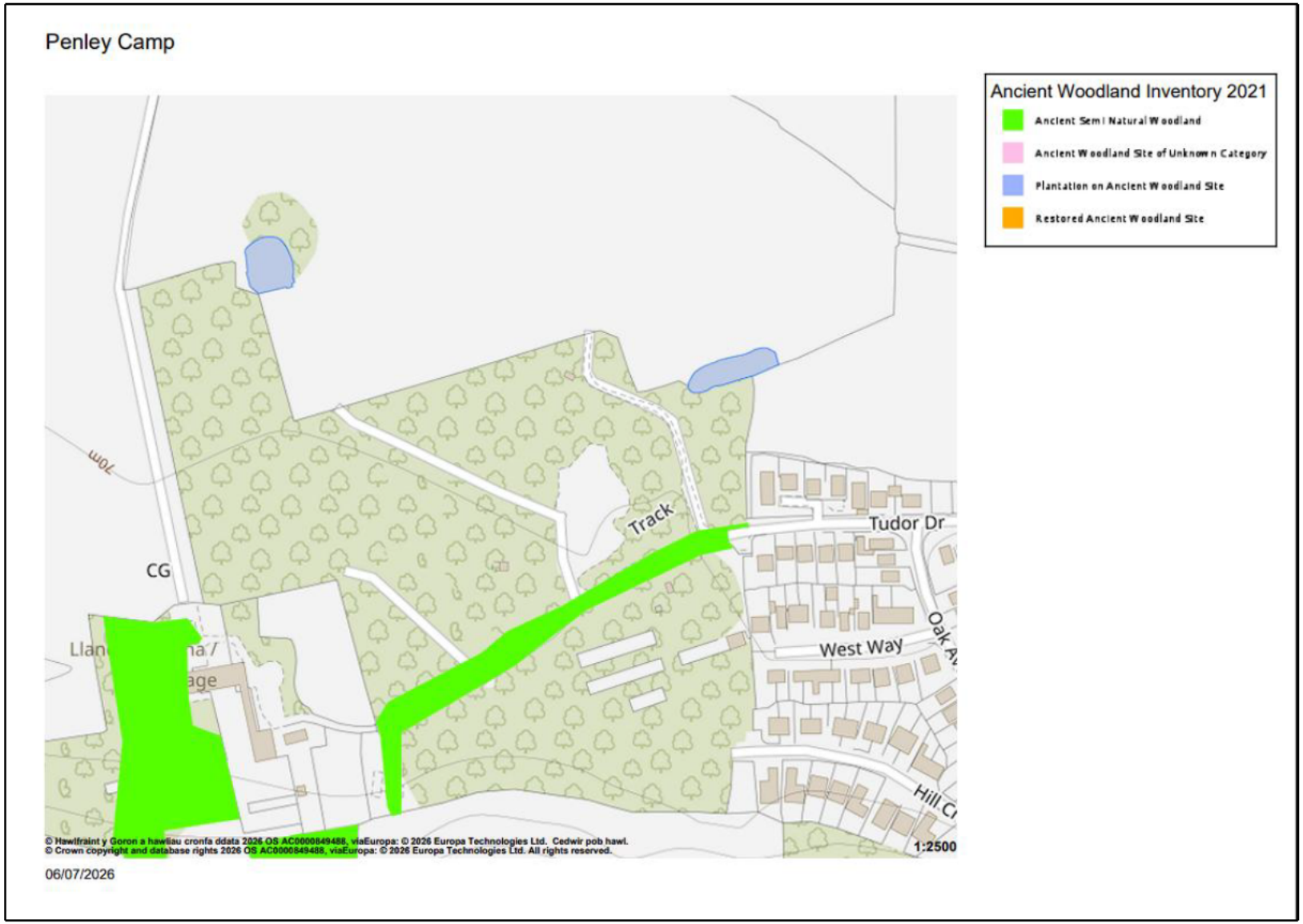
A3.21 In addition to legislation, there are national and local planning policies pertaining to the protection of biodiversity. The Environment (Wales) Act 2016 makes provision for Biodiversity and Ecological Networks, which introduced an enhanced biodiversity and resilience of ecosystems duty on Local 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.

A3.22 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.

A4 APPENDIX – ANCIENT WOODLAND INVENTORY 2021 EXTRACT



A5 APPENDIX – HISTORIC MAPS OF PENLEY AREA

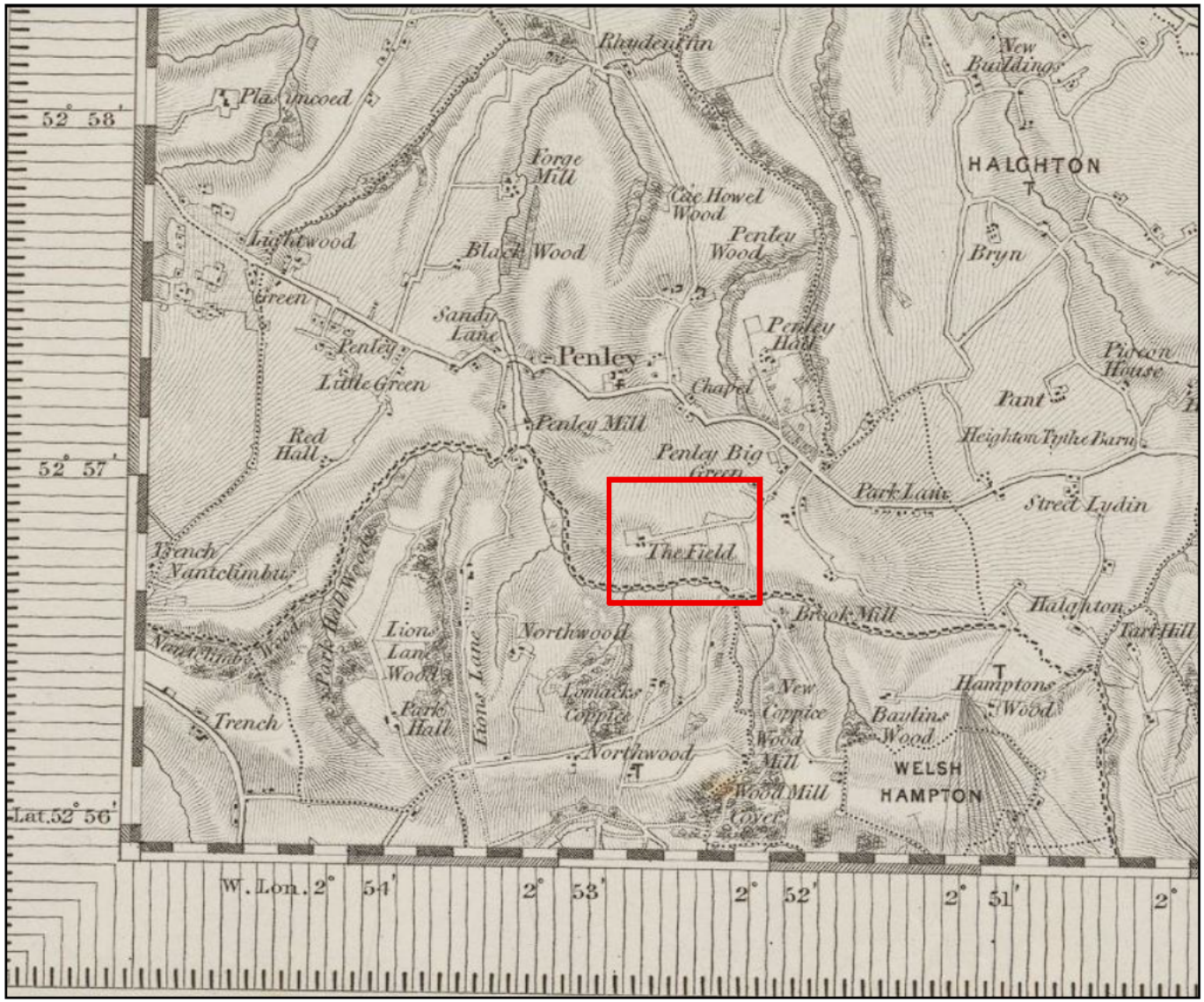


Plate A5.1. Excerpt of Ordnance Survey Map of England and Wales, Sheet LXXIII NW Market Drayton, Surveyed: 1815 to 1830, Revised: 1831, Printed: 1863

The red square indicates the approximate location of the Site and shows the lack of woodland cover.

(Available at https://maps.nls.uk/view/257403295) [Accessed 7th July 2026].



Plate A5.2. Excerpt of 'Actual survey of the County Salop' by John Rocque in 1752.

The red square indicates the approximate location of the Site and shows the lack of woodland cover.

(Available at https://www.oldmapsonline.org/en/Wrexham_County_Borough?gid=8098cbb2-213f-5092-9d48-6808e6a5fd99#position=12.0619/52.9455/-2.8882&goog_rewarded=&year=1752) [Accessed 7th July 2026].



Plate A5.3. Excerpt of Ordnance Survey Map of England and Wales, Flintshire Sheet XXV
Surveyed: 1873, Published: 1878.

The red square indicates the location of the wider landownership and that there is an avenue of trees along the track to Penley House which is the same track used to access the Site. And that the area of the Site and surrounding land is farmland with isolated trees and not woodland

(Available at https://maps.nls.uk/view/266662831) [Accessed 7th July 2026].



Plate A5.4. Excerpt of Ordnance Survey Map of England and Wales, Sheet 122 – Nantwich Surveyed: 1871 to 1879, Revised: 1895, Published: 1897.

The red square indicates the location of the wider landownership. It is presumed that the shading for the area is that of parkland or Estate land. It is not woodland as other woods are shown with different design

(Available at https://maps.nls.uk/view/101167730) [Accessed 7th July 2026].

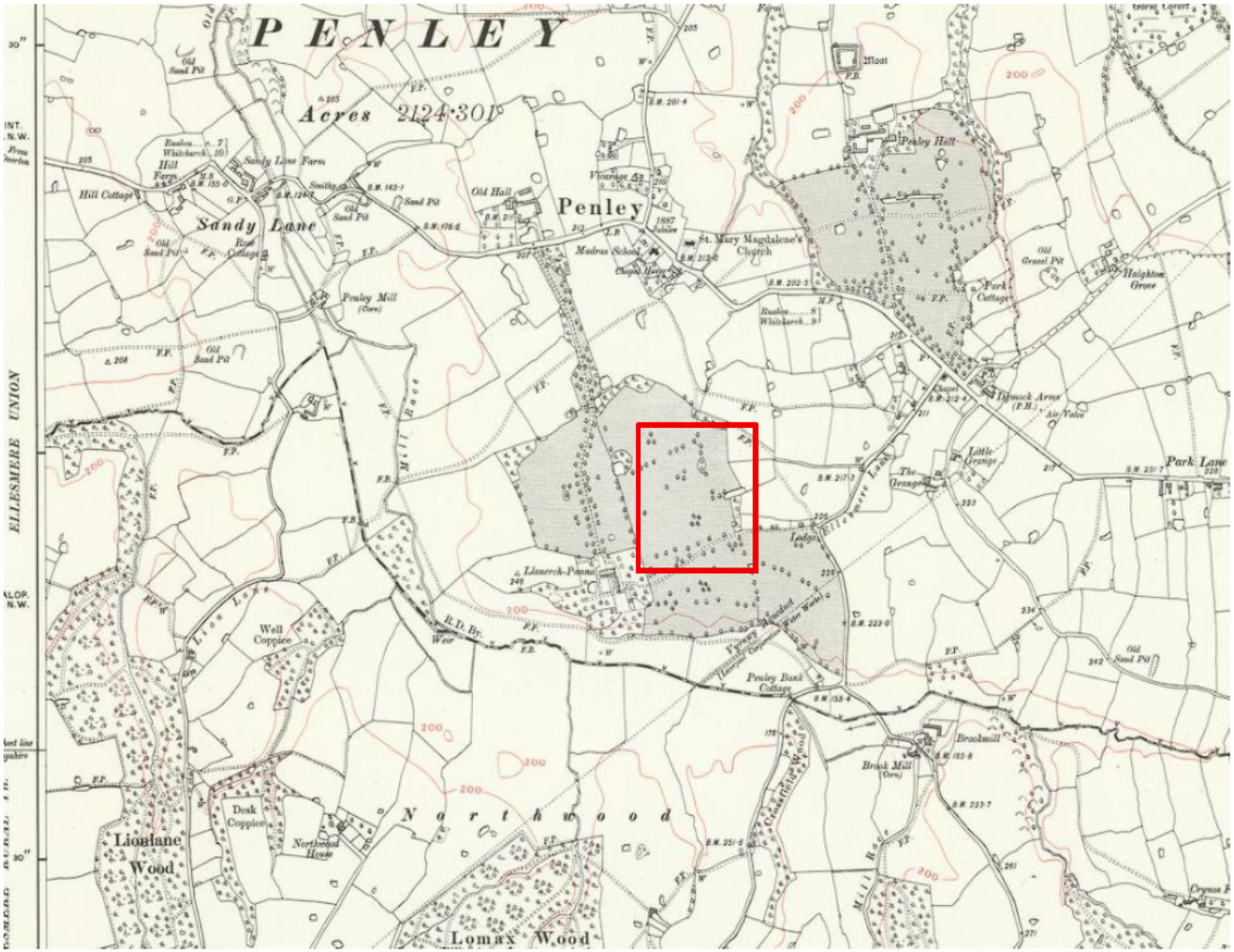


Plate A5.5. Excerpt of Ordnance Survey Map of England and Wales, Flintshire Sheet XXV.NE Revised: 1909, Published: 1914

The red square indicates the approximate location of the Site. The area is shown as parkland or Estate land and not woodland

(Available at https://maps.nls.uk/view/102182044) [Accessed 7th July 2026].

A6 APPENDIX - GREEN INFRASTRUCTURE STATEMENT AND NET BIODIVERSITY BENEFIT PLAN dated 20/02/2026

Mr James Sadowski

Axcess Tree Yard,

Penley Camp

Penley

Green Infrastructure Statement

and

Net Biodiversity Benefit Plan

20th February 2026

Produced by Wildbanks Conservation

www.wildbanksconservation.com

Introduction

This document contains the required ecological mitigation and biodiversity enhancement actions relating to the retrospective planning permission application to store raw timber, logs, woodchip and machinery associated with a tree management business at land off Tudor drive, Penley Wrexham LL13 0JN. For clarity from this point onwards the Site is the footprint of the yard (red line boundary).

A Site visit was undertaken on the 10/02/26 by Mick Smith MCIEEM, Director Wildbanks Conservation with 20 years experience in ecological consultancy. A walk around the wider area owned by Mr Sadowski (blue line boundary) was also completed at this time to inform the Green Infrastructure Statement.

Green Infrastructure Statement

Within the wider area outside of the Site to the south, east and north that is also owned by Mr Sadowski, habitat is dominated by trees growing on and within the remains of an old Polish Hospital built during the Second World War. Few buildings/brick structures exist currently but the remains of them and the concrete pads and roads are present extensively throughout the area. Trees, predominantly sycamore (*Acer pseudoplatanus*) and ash (*Fraxinus excelsior*) with occasional sessile oak (*Quercu petreaea*) and yew (*Taxus baccata*) and scrub, predominantly holly (*Ilex aquafolium*), hawthorn (*Crataegus monogyna*), hazel (*Coryllus avellana*) and blackthorn (*Prunus spinosa*) with bramble (*Rubus fruticosus*) and other ruderal species, common ivy (*Hedera helix*), red dead nettle (*Lamium prupureum*), nettle (*Urtica dioica*) and willow herb species are dominant throughout the area. Significant areas of rubble and concrete from the old buildings are also present throughout the area.

An area of woodland exists in the north western corner of the wider site owned by the applicant. In this area there is not the extent of concrete pads, roads or hardstanding present within the rest of the wider former hospital site and a woodland habitat is present. In this section sessile oak dominate with occasional ash and hazel and hawthorn understorey. Little ground flora was visible during the site visit other than bramble, nettle and ivy. [redacted]

Small stands of Japanese knotweed (*Fallopia japonica*) are also present within this woodland habitat that the applicant is treating regularly.

The timing of the survey is outside the optimal period for detailed botanical assessment and as a result, some plant species could not be identified to species level or may not have been present, it was not always possible to classify habitats to a precise habitat level 4/5 (UK Habs, 2023). However, it is considered that the species that could be identified do provide sufficient information to assess the habitats present and inform this Net Biodiversity Benefits Plan.

No habitat within the wider area surrounding the Site will be effected either temporarily or permanently through the use of the yard for commercial activities. Enhancement measures are proposed to be installed within the wider area around the Site as opportunities within the Site do not exist. The applicant is in support of this and can provide a written confirmation of this.

Existing habitat within the Site

The footprint of the Site is a concrete yard. No trees exist within the yard. A natural earth bund has been created around the yard to act as a buffer to sound and visual appearance. This has vegetated with grass and ruderal species similar to the wider land beyond the Site and creates a good nesting, foraging and resting area for small mammals, amphibians and birds. The yard currently holds machinery and log piles stored for cutting into firewood.

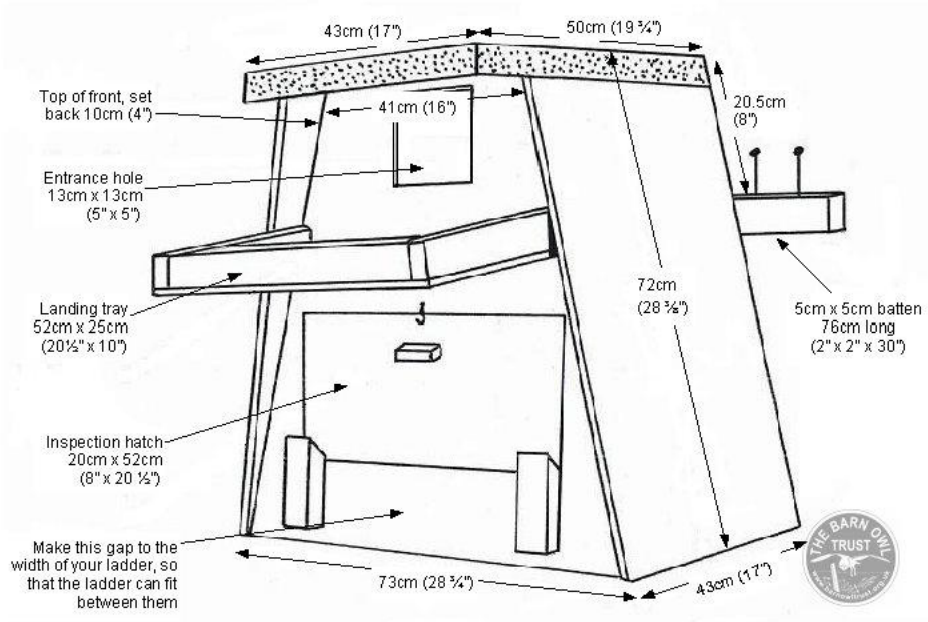
No physical boundary (other than the bund) exists between the Site and wider area. The log piles could provide some nesting habitat for bird species such as robin, wren or blackbird but the high level of use and disturbance within these areas would make this unlikely. As a current working commercial yard the Site holds negligible potential for biodiversity.

The wider area surrounding the Site predominantly consists of trees, scrub and ruderal species and further hardstanding and concrete pads. None of these habitats will be effected by the continuance of the commercial activities.

Although no development will take place, as the works have been completed, all developments have an obligation to increase the biodiversity potential of the site through the development and this document details the suggested biodiversity improvements to meet these obligations. As a result of the implementation of the below recommendations it is anticipated that there will be a significant Net Biodiversity Benefit through the completion of this project.

Briefly, the recommendations include:

- Installation of a barn owl box within a mature oak tree on the northern boundary of the wider site. Facing out on to the fields. The box will be of the design recommended by the Barn Owl Trust.



- Installation of six bat boxes within the woodland in the northwest corner of the wider site (blueline boundary). These will be situated at least 4m in height and positioned two per tree facing south and west with a clear flight path in to them. Boxes will consist of

1. Three Schweglar 2F bat boxes with internal baffle



2. Three general purpose bat boxes



- Installation of six small bird habitat boxes within the woodland in the northwest corner of the wider site (blueline boundary).

3. Two open fronted bird boxes suitable for wrens, robins, spotted flycatchers, pied and grey wagtails, song thrushes and blackbirds. Located at 2m in height an not facing in to direct sunlight or prevailing winds



4. Two tree creeper boxes to be positioned 2–4 meters high on the trunk of a mature tree with rough bark (such as oak). The box should face north, east, or southeast to avoid prevailing winds and direct sunlight. Ensure it has a clear, unobstructed flight path and is placed in a quiet, shaded spot



5. Two woodpecker bird boxes mounted at least 4 m off the ground on a mature trunk facing north or east with a clear flight path and minimal disturbance.

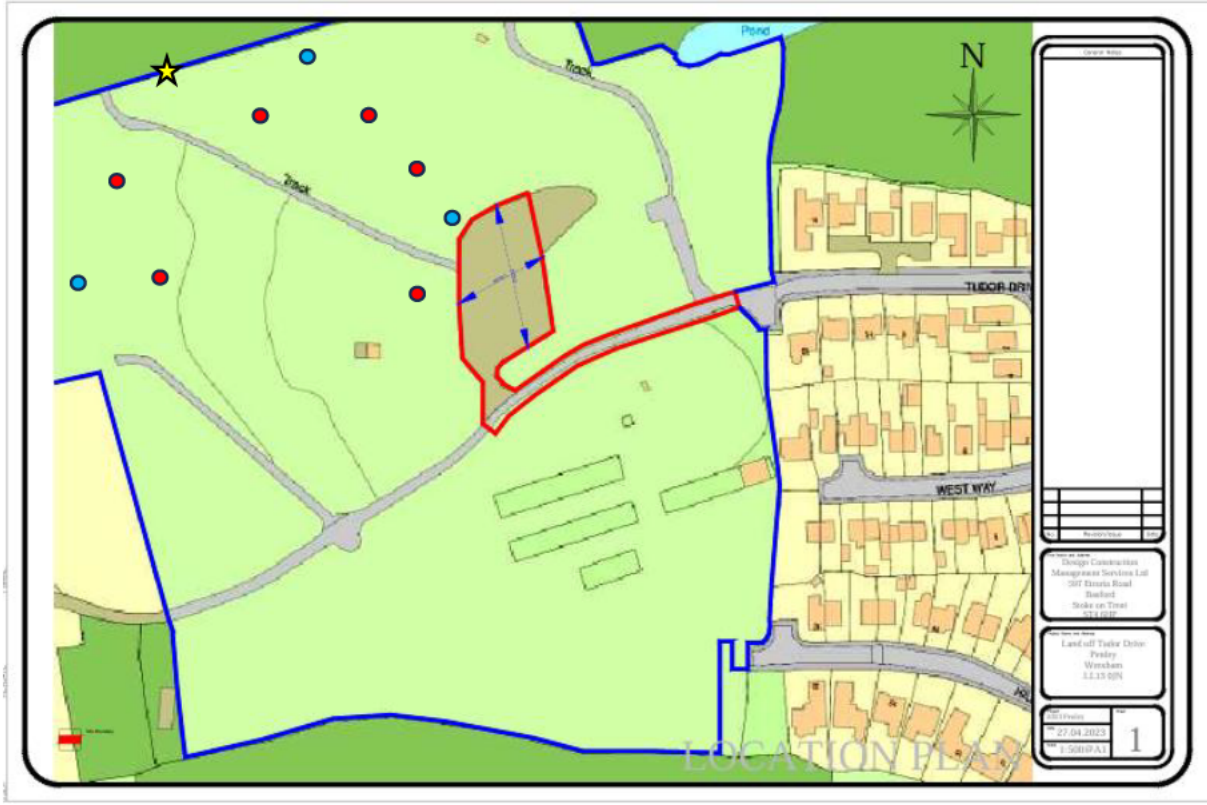


Biodiversity management schedule

The below table dictates the management timescales and schedule for the biodiversity enhancement measures within the project and should be adhered to.

Biodiversity Enhancement Management Schedule					
Task	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 5**
Installation of bat boxes	ASAP				
Monitoring of bat boxes		Autumn	Autumn	Autumn	Autumn
installation small bird habitat boxes	ASAP				
Cleaning out of bird boxes		Autumn	Autumn	Autumn	Autumn

Figure 1: The development layout plan with the location of the bat and bird boxes added.



Legend

☆	Barn owl box
●	X2 bat boxes per tree
●	Six bird habitat boxes