ECOLOGY CONSULTING

Land at Bryn Lane, Wrexham

Great Crested Newt Survey Report and Outline Mitigation Strategy

Prepared for Elite Onyx Properties (UK) SARL, July 2026

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Version	Date	Status
01	02/06/2026	First issue
02	09/07/2026	Updated in response to consultee comments

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Executive Summary

Great Crested Newt (GCN) surveys undertaken in ponds adjacent to the Proposed Development site confirmed the presence of a breeding population of the species, with a small population identified within one of the five the ponds surveyed. Although no ponds are present within the site itself, the close proximity of occupied ponds and the presence of suitable terrestrial habitat within the site, including grassland, scrub, woodland and areas of degraded hardstanding, indicate that the site is likely to be used by GCNs for foraging, sheltering, dispersal and potentially hibernation.

In the absence of mitigation, the proposed development has the potential to result in the disturbance, injury or mortality of individual GCNs during site clearance and construction activities, together with the loss and fragmentation of terrestrial habitat utilised by the species. Potential operational impacts may also arise through the installation of drainage infrastructure that could present a risk of amphibian entrapment.

To address these impacts, a comprehensive mitigation strategy will be implemented under a derogation licence issued by Natural Resources Wales (NRW). The mitigation measures include staged vegetation clearance during the active season, supervised removal of refugia, installation of amphibian exclusion fencing, trapping and translocation and the potential use of GCN detection dogs and destructive searching where required. Operational mitigation will also be incorporated into the drainage design to minimise the risk of amphibian entrapment and mortality.

In addition to the construction and operational mitigation measures, a dedicated 1.6ha GCN Habitat Management Area will be established and managed specifically for the benefit of the species. This area will include a range of habitat enhancement measures comprising scrub management, creation of shallow scrapes, construction of hibernacula, provision of brash and log piles, and installation of artificial refugia. These measures will increase the availability of high-quality terrestrial habitat and improve habitat connectivity within the local landscape.

The GCN Habitat Management Area will be subject to a programme of long-term management and ecological monitoring to ensure that habitat features establish successfully and continue to function as intended. Monitoring results will be used to inform adaptive management where necessary to ensure that the habitat objectives are achieved and maintained over time.

Subject to the successful implementation of the mitigation, compensation, management and monitoring measures outlined in this report, the proposed development is not expected to adversely affect the Favourable Conservation Status of the local GCN population. Furthermore, the establishment and long-term management of the dedicated GCN Habitat Management Area is expected to provide a net benefit for the species and contribute to the maintenance and enhancement of the local population in the long term.

1 Introduction

1.1 Terms of Reference

Ecology Consulting Ltd was instructed by Colliers, on behalf of Elite Onyx Properties (UK) SARL, to undertake great crested newt *Triturus cristatus* (GCN) surveys at the site of a proposed new warehouse and associated infrastructure located at land off Bryn Lane, Wrexham. Please note this document has been updated in response to comments from Natural Resources Wales (NRW), a summary of the comments from NRW and a response to each of these comments is provided for ease of review in Appendix C.

1.2 Objectives

The objectives of this study are to:

- Report the current ecological baseline of GCNs at/adjacent to the site.
- Identify the presence of suitable GCN habitats within the site.
- Identify potential adverse impacts and specify mitigation and/or compensation measures where necessary.

1.3 Proposed Works

Based on current development proposals, the site would be re-developed to accommodate an eastern extension to the current Very warehouse building at land off Bryn Lane.

1.3.1 Relevant Legislation and Planning Policy

Section 6 under Part 1 of the Environment (Wales) Act 2016 (as amended 2026) introduced an enhanced biodiversity and resilience of ecosystems duty (the S6 duty) for public authorities in the exercise of functions in relation to Wales. The S6 duty requires that public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems.

Section 7 goes on to deal with biodiversity lists and duty to take steps to maintain and enhance biodiversity. This section replaces the duty in Section 42 of the Natural Environment and Rural Communities (NERC) Act 2006 in Wales. The Welsh Ministers publish, review and revise lists of living organisms and types of habitat in Wales that they consider are of key significance to sustain and improve biodiversity in relation to Wales. These are known as Priority Species and Priority Habitats[1].

GCNs are protected under the Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species Regulations 2017 (as amended). This makes it an offence to kill, capture or injure GCN or damage or destroy a GCN breeding site or resting place. Deliberate or reckless disturbance of great crested newts which could affect the ability of any significant group of animals to survive, breed or reproduce, rear their young or hibernate may also result in an offence. GCN are also listed under Section 7 of the Environment Act (Wales) 2016 as a Priority Species.

The Environment (Wales) Act 2026 also introduces the Sustainable Management of Natural Resources (SMNR) and sets out a framework to achieve this as part of decision-making. The relevant key features of the SMNR approach to which the planning system can contribute are:

[1] https://www.biodiversitywales.org.uk/environment-wales-act

- Improving the resilience of ecosystems and ecological networks;
- Halting and reversing the loss of biodiversity;
- Maintaining and enhancing green infrastructure based on seeking multiple ecosystem benefits and solutions; and
- Ensuring resilient locational choices for infrastructure and built development, taking into account water supplies, water quality and reducing, wherever possible, air and noise pollution and environmental risks, such as those posed by flood risk, coastal change, land contamination and instability.

Wrexham Unitary Development Plan (UDP)
The adopted Wrexham Unitary Development Plan (UDP) 1996–2011, which remains part of the statutory development plan for Wrexham, includes biodiversity policies PS11 (Biodiversity) and Policy EC6 (Biodiversity Conservation).

Policy PS11 – Biodiversity seeks to encourage development that protects, enhances and improves the biodiversity value of sites. The policy supports measures that contribute positively to nature conservation interests and the enhancement of ecological resources.

Policy EC6 – Biodiversity Conservation states that development proposals within or adjacent to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the intrinsic nature conservation value of the site. Where impacts cannot be avoided, harm should be minimised and appropriate mitigation and compensatory measures implemented. The policy also supports opportunities to enhance biodiversity and nature conservation interests.

Local Planning Guidance Note No. 32: Biodiversity and Development
Local Planning Guidance Note (LPGN) 32: Biodiversity and Development provides supplementary guidance to the UDP and is a material consideration in the determination of planning applications. The guidance emphasises the importance of integrating biodiversity considerations into the planning process and seeks to ensure that development proposals avoid adverse impacts on habitats, protected species and sites of nature conservation importance.
LPGN 32 promotes a hierarchical approach to biodiversity conservation, whereby ecological impacts should first be avoided, then mitigated, and finally compensated where residual effects remain. The guidance also encourages the incorporation of biodiversity enhancement measures within development proposals to secure net gains for wildlife wherever practicable. Ecological surveys and assessments are expected where habitats or species of conservation importance may be affected by development.

2 Methodology

2.1 Desk Study

A request for details of protected and notable species, and locally designated sites within 2km of the centre of the site (GR: SJ 39482 50128) was made to COFNOD (The Home of Wildlife Data for North Wales), with data returned in February 2026. Additionally, the Multi-Agency Geographic Information for the Countryside (MAGIC5) website was consulted for details of statutory designated sites and Priority Habitats, within a 2km search for UK statutory sites and a 10km search for EU statutory sites, from the centre of the site.

It should be noted that a lack of species records within an area may not reflect an actual absence of that species but could simply be a function of limited recording/survey effort in that area.

2.2 Great Crested Newt Surveys

Great crested surveys were undertaken on five ponds (as shown on Figure 1, Ponds 1, 2, 3, 5 and 6) between April and June 2026. Surveys were undertaken in accordance with the principles and methodologies set out within relevant guidance[2] and surveys were undertaken to establish presence/likely absence of GCN, followed by an assessment of population size where present. Surveys techniques used included torchlight surveys, egg searches, hand netting and searching natural refugia. In accordance with current guidance[2], bottle trapping was avoided as it was not necessary to use this survey technique. All surveys were led by suitably experienced ecologists operating under a NRW GCN survey licence, under appropriate weather conditions and in accordance with current biosecurity protocols and animal welfare requirements.

Surveys were undertaken as specified in the table below.

Table 1: Survey information

Survey Number	Date
1	15 April 2026
2	22 April 2026
3	05 May 2026
4	12 May 2026
5	19 May 2026
6	01 June 2026

2.3 Limitations

The 2026 great crested newt surveys were undertaken following an exceptionally dry winter and spring. Prolonged dry conditions are likely to have reduced the suitability of breeding ponds, with some individuals potentially delaying or foregoing breeding altogether and remaining in terrestrial habitats. Consequently, survey results may underestimate the size of the local population, as fewer individuals may have been present within breeding ponds and therefore available for detection during surveys.

There were limitations at some of the ponds surveyed during the GCN surveys. There was no access to Pond 4 (a large fishing lake) which is on private land. Pond 1 had breeding Canada geese on the east side, meaning that part of the pond perimeter was avoided during the surveys. Pond 2 had very deep silt and floating mats of vegetation and as such, even with chest waders, the entire area of the pond could not be surveyed. Pond 3 had breeding Canada

[2] GCN SMG 2025 (Great Crested Newt Survey and Mitigation Guidelines)

geese on the north side of the pond but the main restriction was dense scrub which surrounds the ponds on all sides, with only a couple of points available where surveys could be safely undertaken from bankside, as the water and silt is too deep to safely enter the waterbody. The limitations are Ponds 1 and 2 are minor and whilst the limitation at Pond 3 is significant, this is unlikely to significantly affect proposed mitigation, as discussed further in Section 4.

3 Results and Evaluation

3.1 Desk Study

The desk study returned 169 records (some of which contain more than one individual) of GCN dating between 1991 and 2025. Several of these records are located within the site boundary.

Eighteen records of Priority Species common toad (*Bufo bufo*) were returned from the 2km data search from the centre of the site, dating between 1992 and 2025. The closest record is located within the site boundary, where suitable habitat is present.

In addition to the biological records returned as part of the desk study, previous great crested newt surveys and licensed mitigation undertaken within Wrexham Industrial Estate have been reviewed. These demonstrate that the application site forms part of a wider interconnected network of breeding ponds and terrestrial habitat supporting the nationally important great crested newt resource associated with Wrexham Industrial Estate. Previous investigations of the adjacent land identified medium-sized populations of great crested newts within several ponds associated with the site and surrounding landscape, with suitable terrestrial habitat providing functional connectivity between breeding ponds.

Previous presence/absence and population size class surveys undertaken in support of the adjacent Plot 3A development recorded a medium population of great crested newts within Ponds 3, 4, 5 and 6 on the Plot 3A site, together with breeding populations within Ponds 24 and 26 located outside of the Plot 3A site. These findings demonstrate that the application site forms part of a wider interconnected network of breeding ponds and terrestrial habitat supporting the nationally important great crested newt resource associated with Wrexham Industrial Estate.

An extensive great crested newt compensation area has been created immediately east of the adjacent Plot 3A development, and a large number of great crested newts have been translocated to this area under a licensed mitigation programme. The compensation area includes circa 20 newly created breeding ponds together with extensive terrestrial habitat established as part of the approved mitigation and compensation strategy. This has substantially increased the availability of suitable breeding and terrestrial habitat within the local landscape and now forms an important component of the wider great crested newt resource associated with Wrexham Industrial Estate.

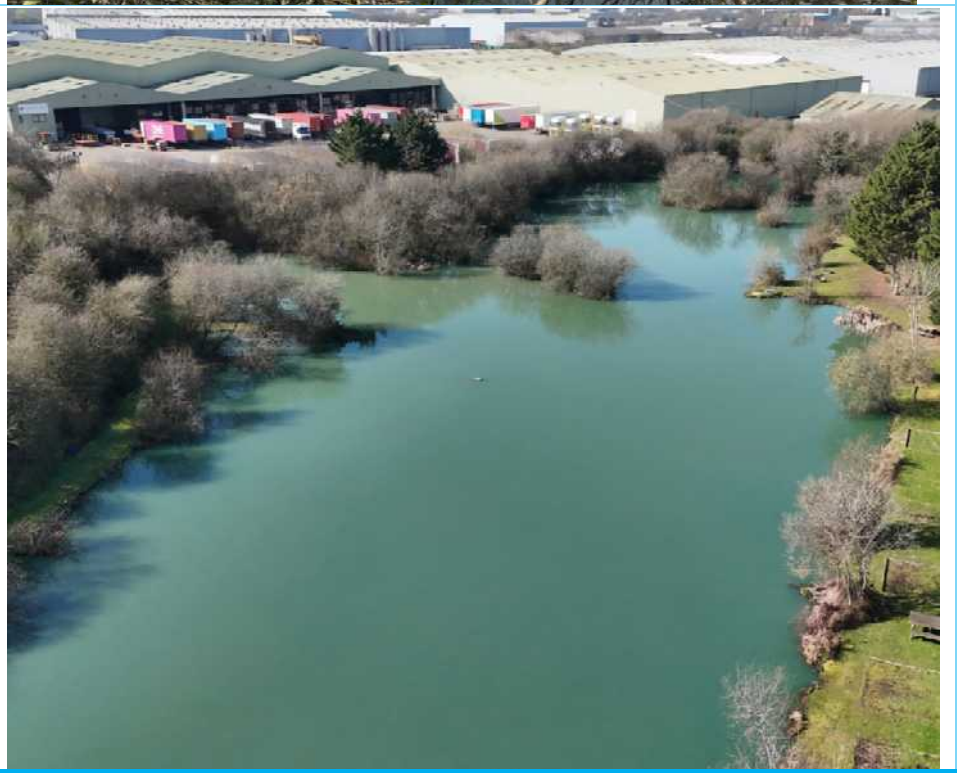
The application site forms part of the wider Wrexham Industrial Estate great crested newt population, which is recognised as being of national importance (Wales) and is currently considered to be in an unfavourable conservation status. This population forms part of a wider network of interconnected great crested newt populations of regional and national significance, including those associated with the Johnstown Newt Sites Special Area of Conservation (SAC). Consequently, the maintenance and enhancement of breeding ponds, terrestrial habitats and habitat connectivity within the local landscape are important to support the recovery and long-term resilience of this strategically significant population

3.2 Habitat Suitability

There are several ponds within close proximity to the site, as shown on Figure 2 and a large number of ponds in the wider area. A large pond (Pond 1) is present within the site boundary to the west of the existing office buildings. There are two ponds (Ponds 2 & 3), which are surrounded by scrub, along the southern boundary of the site and a large fishing lake (Pond 4) is also present along the southern boundary of the site. There are also two ponds in close proximity to the eastern boundary of the site; Pond 5 adjacent to the south east boundary and Pond 6 adjacent to the north east boundary. A photograph of each pond is provided below, as well as an aerial image of the Proposed Development and the habitats present within that area.

Table 2: Surveyed Ponds

Pond Number	Photograph
1	
2	

3	
4	

5	
6	

Overview of Development Area	

A planning guidance note[3] on Wrexham Industrial Estate from 2009 indicates many of these ponds, including Ponds 1, 2, 3, 4 and 6 previously supported breeding populations of GCN.

In the wider area there are a large number of other ponds within 250m of the site, including a large number of newly created ponds which form part of a GCN mitigation area to the north east which is associated with the development of land to the immediate north of the site.

A large proportion of the site comprises hardstanding, which is of poor suitability for use by amphibians, with the exception of areas of broken hardstanding east of the existing warehouse which temporarily hold pools of water during the winter and early spring months. This area is also laden with discarded materials and equipment which could be used for shelter by amphibians. Immediately south of this area, there is an area of dense bramble and mixed scrub, which is slightly isolated between built development and hardstanding to the north and west and an access road to the south and east, but could be used by amphibians. East of the access road there is a material storage area, an area of scrub, grassland and woodland, all of which provide excellent terrestrial habitat for amphibians. Further information is available within the project Preliminary Ecological Appraisal[4].

3.3 Presence/Absence Surveys

A full schedule of survey results is provided within Appendix A.

GCNs were identified in one of the five ponds surveyed, Pond 6 near the north eastern boundary, where a small population of great crested newts were found with a maximum count of two individuals on Survey 2. Whilst no eggs were found, a gravid female was observed during Survey 2, indicating that Pond 6 is likely to be a breeding pond. A small number of smooth/palmate newts were also recorded in Pond 6. Common amphibians (common toad) were found in Pond 5 and smooth/palmate newts were found in the temporary pools within broken hardstanding areas although these areas had dried up by the third survey in early May. No amphibians were

[3] Wrexham County Borough Council, 2009. Local Planning Guidance Note 29: Wrexham Industrial Estate. Wrexham County Borough Council.

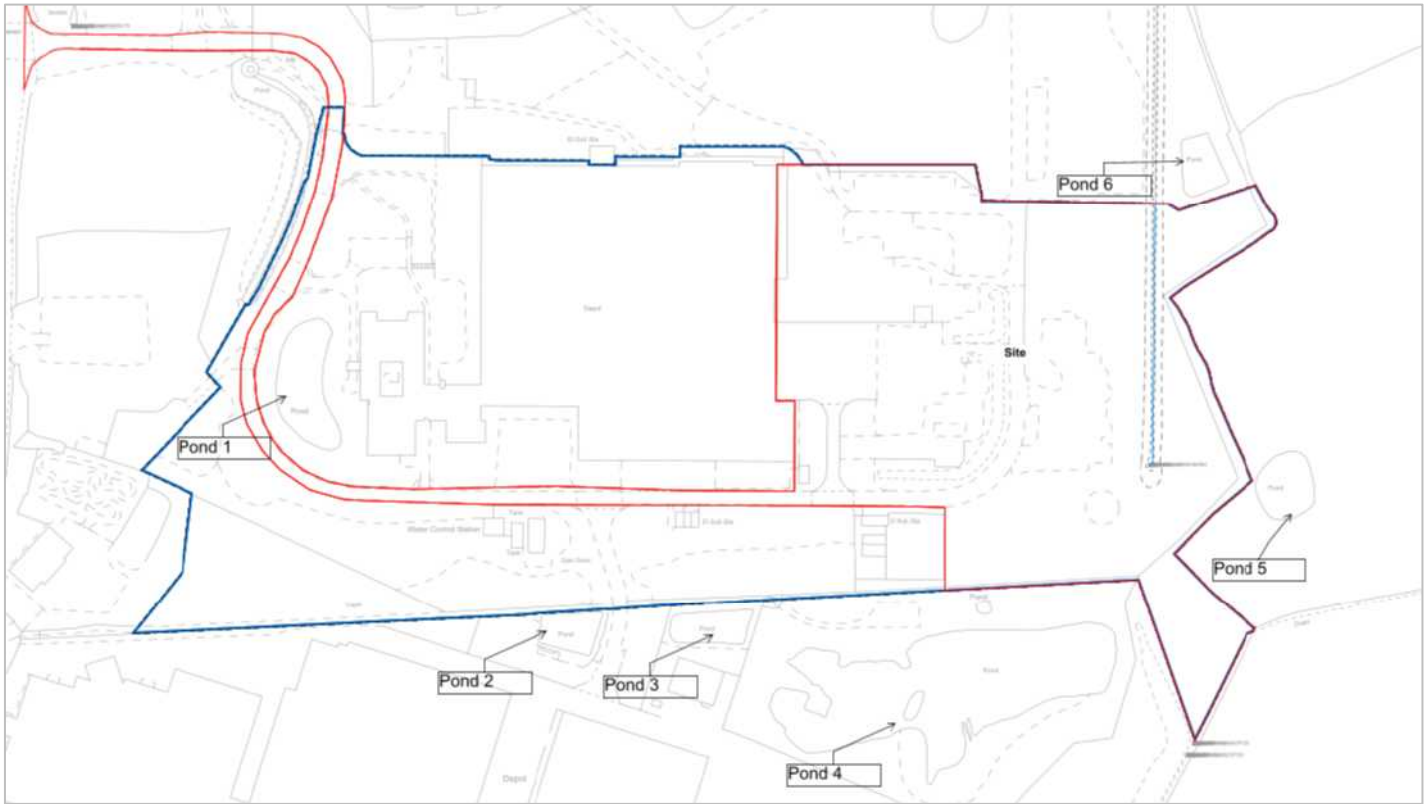
[4] Penny Anderson Associates, 2026, Land at Wrexham Industrial Estate Preliminary Ecological Appraisal

found in Pond 1 (where fish were noted to be present), or Ponds 2 or 3 although dense scrub, deep silt and breeding birds limited the surveys on these waterbodies.

3.4 Potential Impacts

Please note potential impacts are fully quantified within the separate Ecological Impact Assessment report[5] for the site.

No ponds are present within the site as shown on the image below.



Pond locations. Redline (application site). Blueline (ownership boundary).

GCNs have been recorded breeding within ponds located in close proximity to the site. The presence of breeding populations within the local landscape, combined with the close proximity of these ponds and the availability of suitable terrestrial habitat on site indicates a high likelihood that GCNs utilise the site during their terrestrial life stages.

Suitable habitat is present in the form of grassland, scrub, woodland edge and areas of degraded hardstanding, all of which can provide shelter, foraging opportunities, dispersal routes and refugia for GCNs. Consequently, GCNs are considered likely to occur throughout parts of the site despite the absence of breeding habitat within the site boundary.

In the absence of mitigation, construction activities have the potential to result in the disturbance, injury or mortality of individual GCNs during vegetation clearance, groundworks, excavation and the removal of refugia.

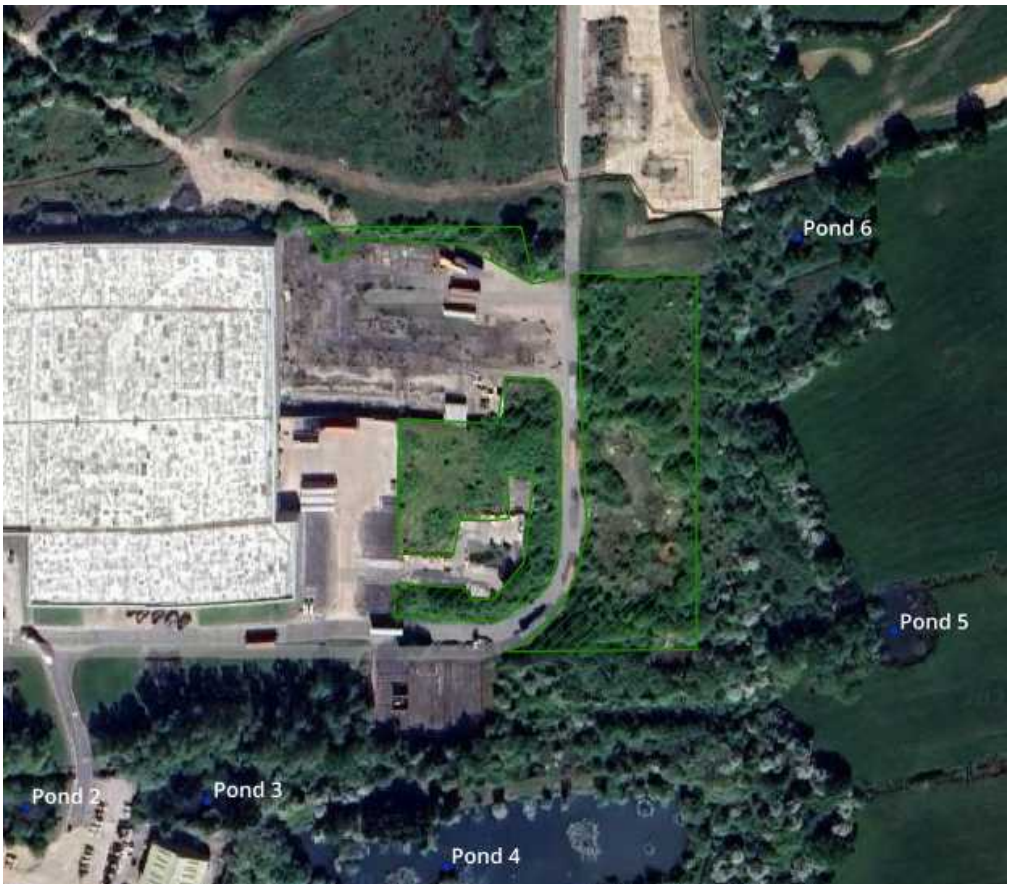
Habitats which will be lost to the development and their suitability for GCNs are summarised in the table below.

[5] Ecology Consulting Ltd, 2026, P_EOP_01_R001_EcIA_Rev01

Table 3: Habitat loss

Habitats	Area (ha)
Unsuitable habitats (hardstanding, roads)	3.72
Suitable habitats (scrub, grassland, woodland)	1.4
Total application site area	5.12

An overview of the area of suitable habitats which will be lost are shown in green on the image below.



Suitable habitats which will be lost to the proposed development (hashed green).

Habitat loss associated with the development would reduce the availability of suitable terrestrial habitat used for foraging, sheltering and dispersal. Furthermore, the removal or fragmentation of habitat could adversely affect ecological connectivity, potentially isolating individuals or from surrounding breeding ponds and restricting movement between habitat areas.

During the operational phase, there is potential for GCNs to become trapped within drainage infrastructure, particularly gully pots and similar below-ground drainage features. Entrapment may result in injury, mortality or increased vulnerability to predation. Without appropriate design measures, such features can act as ecological sinks, reducing the permeability of the site for amphibians and negatively affecting local population resilience.

Overall, without mitigation, the development has the potential to result in adverse effects on GCNs through disturbance, direct mortality, habitat loss, habitat fragmentation and the creation of operational hazards associated with site drainage infrastructure. Appropriate avoidance, mitigation, compensation and enhancement measures are therefore required to mitigate and compensate for impacts.

4 Outline Mitigation and Compensation Strategy

4.1 Mitigation Approach

4.1.1 Construction

As the GCN is a protected species, all activities with the potential to result in the capture, disturbance, injury or killing of GCNs, or the damage or destruction of habitats used by the species, would need to be undertaken under a derogation licence issued by Natural Resources Wales (NRW). No site clearance, exclusion, trapping, translocation, destructive searching or other licensable activities would be able to commence until the licence had been granted. All mitigation measures described herein will be implemented in accordance with the approved licence Method Statement and under the supervision of suitably qualified ecologists to ensure compliance with legislative requirements and the maintenance of the Favourable Conservation Status of the local GCN population.

Site clearance, exclusion and capture works will be undertaken during the active period for GCNs, between late March and early October inclusive, unless otherwise agreed with NRW. Undertaking these activities during the active season will minimise the risk of disturbing hibernating individuals, which may be concealed within below-ground refugia and therefore less able to disperse or be safely relocated from working areas.

Prior to commencement of construction, vegetation clearance and habitat removal will be undertaken in a staged and directional manner to encourage any GCNs present to disperse naturally from working areas into retained habitat. Clearance will be undertaken progressively, beginning with the removal of taller vegetation and scrub, followed by the gradual reduction of vegetation cover to ground level. This approach will minimise the risk of trapping or injuring animals and allow sufficient opportunity for dispersal.

Any features with the potential to provide refuge for GCNs, including log piles, brash piles, rubble, discarded materials and other debris, will be carefully dismantled under ECoW supervision. Materials will be removed incrementally and searched for amphibians prior to removal from the site. Any GCNs encountered will be relocated to a receptor area in accordance with the approved mitigation strategy and the requirements of the NRW licence.

Temporary amphibian exclusion fencing will be installed around the perimeter of the development area (see Figure 2) prior to the commencement of clearance works. The fencing will prevent GCNs from entering active construction areas and facilitate a programme of population trapping and translocation. Along the southern and eastern boundaries, one-way amphibian fencing will be installed to allow GCNs to move freely out of the development footprint whilst preventing re-entry. This will encourage natural dispersal into retained habitats and the wider landscape.

Within the fenced area, a network of drift fencing and pitfall traps will be established to intercept and capture GCNs remaining within the development footprint. Traps will be checked at appropriate intervals by licensed ecologists, and any GCNs captured will be translocated to suitable retained or receptor habitats. Trapping will continue until agreed capture targets have been achieved and the site can be demonstrated to be suitably clear of GCNs.

Given the nature of the habitats present and the potential complexity of the site, the use of trained GCN detection dogs may be employed to support the capture and clearance programme. Detection dogs can assist in identifying areas of high amphibian activity, locating individuals concealed within dense vegetation or refugia, and improving the efficiency of exclusion and translocation operations. Any deployment of detection dogs would be undertaken by suitably qualified specialists and integrated into the wider mitigation programme.

Where structures, foundations, hardstanding, rubble deposits, earth banks, retaining walls or other features have the potential to support sheltering or hibernating GCNs and cannot be rendered suitable for clearance through trapping and exclusion alone, destructive searching may be undertaken under the supervision of the licensed ecologist. Destructive searching will involve the careful, systematic dismantling or excavation of features using hand tools and, where necessary, mechanical plant operating under direct ecological supervision. Works will proceed incrementally to allow any GCNs encountered to be safely captured and translocated to suitable receptor habitats. The requirement for destructive searching, and the extent to which it is undertaken, will be determined following completion of the exclusion programme and in accordance with the approved NRW licence Method Statement.

Following completion of the exclusion exercise and any required destructive searching, construction activities will proceed within the fenced working area. The ECoW will provide toolbox talks, undertake monitoring visits during key phases of construction and advise on the implementation of ecological protection measures throughout the works.

Through the implementation of these measures, the risk of injury, mortality and disturbance to GCNs will be substantially reduced, whilst maintaining the favourable conservation status of the local population and preserving ecological connectivity with surrounding habitats.

4.1.2 Operation

The operational drainage design will seek to minimise the risk of GCNs becoming trapped within drainage infrastructure. Wherever practicable, the use of traditional gully pots and similar below-ground drainage features will be avoided. Alternative drainage solutions that eliminate the risk of amphibian entrapment will be incorporated into the detailed design where feasible.

Where use of gully pots cannot be avoided, they will be designed and positioned to reduce the likelihood of GCN capture. In particular, gullies will be offset from kerb lines and other features that may channel amphibian movements towards drainage inlets. This will reduce the likelihood of dispersing GCNs encountering drainage features during routine movements across the site.

Where appropriate, amphibian-resistant covers or grilles will be incorporated to prevent access to drainage structures. Where residual risks remain, gully pots will be fitted with amphibian escape measures, such as escape ladders or ramps, in accordance with recognised best-practice guidance. These features will enable any amphibians entering drainage structures to escape safely and will substantially reduce the risk of entrapment and mortality during the operational phase of the development.

The specification of drainage mitigation measures will be agreed during the detailed design stage and incorporated into the final construction drawings. Through the adoption of these measures, the risk of entrapment, injury and mortality of GCNs within the operational drainage network will be minimised, ensuring that the completed development remains permeable to amphibian movement and does not function as an ecological sink.

4.2 Compensation

An area of approximately 1.6ha will be designated as a dedicated GCN Habitat Management Area (as shown on Figure 3) and will be secured for long-term ecological management and monitoring. The GCN Habitat Management Area has been designed to offset the loss and fragmentation of terrestrial habitat resulting from the Proposed Development through the provision of a minimum like-for-like area of suitable habitat, together with habitat enhancement and long-term management. Collectively, these measures will improve habitat quality, strengthen ecological connectivity and deliver an overall net benefit for the local great crested

newt population. The habitat loss and creation areas pre and post development are summarised in the table below.

Table 4: Available Great Crested Newt Terrestrial Habitat Pre- and Post-development

Habitats	Area (ha)
Pre-development	1.4
Post development	1.6

It is acknowledged that the proposed mitigation area already provides suitable terrestrial habitats for great crested newts and therefore does not represent wholly new habitat. However, the area is currently unmanaged and will be enhanced through the implementation of the proposed mitigation strategy, including habitat creation, provision of refugia and hibernacula, scrub management and long-term ecological management. Whilst the increase in habitat extent is relatively modest (approximately 0.2 ha), the principal benefit arises from the long-term management and enhancement of habitat that is currently unmanaged, resulting in a substantial improvement in habitat quality, functionality and security for great crested newts..

The compensation area will provide high-quality foraging, sheltering, dispersal and hibernation opportunities for GCN. The proposed enhancement measures will also improve ecological connectivity between the site and surrounding habitats, increasing the resilience of the local population and contributing towards the maintenance of Favourable Conservation Status.

The following habitat enhancement measures will be implemented within the GCN Habitat Management Area (illustratively shown in Appendix B):

- Creation of brash and log piles;
- Construction of hibernacula;
- Creation of shallow, ephemeral scrapes;
- Installation of artificial refugia; and
- Scrub thinning and management.

4.2.1 Creation of Brash and Log Piles

Arisings generated through scrub thinning and management will be retained on site and used to create a series of brash and log piles. These features will provide additional refugia, support invertebrate prey populations and enhance habitat connectivity by acting as stepping stones between offsite ponds, hibernacula and terrestrial habitats used by GCNs. Brash piles will be distributed throughout the area to maximise their ecological value and provide shelter opportunities across the site.

4.2.2 Construction of Hibernacula

Hibernacula will be created using locally sourced logs, brash, stones and soil to provide a network of terrestrial refuge features across the habitat area. Structures will be positioned within suitable rough grassland and scrub habitats, above areas susceptible to flooding, and within dispersal distance of nearby ponds. The hibernacula will provide shelter, hibernation opportunities and protection during periods of adverse weather, whilst also offering year-round refuge for GCNs and other wildlife.

4.2.3 Creation of Shallow Ephemeral Scrapes

Shallow ephemeral scrapes are proposed as habitat enhancements rather than replacement breeding ponds. The Proposed Development will not result in the loss of any ponds or other aquatic habitats used by great crested newts and therefore the creation of new permanent breeding ponds is not considered necessary. Since the previous surveys, an extensive mitigation

area has been established immediately east of the adjacent Plot 3A development, incorporating circa 20 newly created ponds together with extensive terrestrial habitat, substantially increasing breeding habitat availability within the local landscape. The proposed mitigation strategy therefore focuses on enhancing the quality and functionality of terrestrial habitat through long-term management, provision of refugia and hibernacula, and the creation of shallow ephemeral scrapes to increase habitat diversity and provide additional seasonal wet features. A series of shallow scrapes will be created throughout the compensation area. These features will be designed to remain seasonally or semi-permanently wet, creating a network of damp microhabitats that increase habitat diversity and ecological connectivity. The scrapes will provide valuable foraging habitat by supporting aquatic and semi-aquatic invertebrates and will create sheltered, humid conditions favoured by amphibians.

The scrapes will typically be between 5m² and 10m² in area, with gently sloping sides and maximum depths of approximately 0.2–0.5m. They will be positioned in locations that naturally receive rainfall and surface water runoff and will be allowed to colonise naturally with vegetation. By creating a mosaic of shallow wetland features between terrestrial refugia and nearby breeding ponds, the scrapes will act as ecological stepping stones that facilitate dispersal and improve functional connectivity across the landscape.

4.2.4 Installation of Artificial Refugia

Additional artificial refugia will be installed throughout the compensation area using plywood sheets, roofing felt or other suitable materials. These features will provide temporary shelter opportunities for GCNs during dispersal and foraging activities and will supplement the natural refugia created through the provision of hibernacula, brash piles and retained vegetation. Artificial refugia may also assist with future monitoring and management of the area.

4.2.5 Scrub Thinning and Management

Selected areas of dense scrub will be thinned to create a more structurally diverse habitat mosaic comprising open grassland, scrub margins and scattered scrub stands. This will improve habitat heterogeneity, increase opportunities for movement and foraging, and encourage the development of a varied ground flora and associated invertebrate communities that provide prey resources for GCNs. Arisings generated through scrub management will be retained on site and used in the creation of habitat features described above.

Collectively, these measures will create a diverse and interconnected network of habitats that provide shelter, foraging opportunities, dispersal routes and hibernation sites for GCNs.

4.3 Monitoring

The GCN Habitat Management Area will be subject to a programme of long-term management and monitoring to ensure that the habitat features establish successfully and continue to provide suitable conditions for GCNs throughout the lifetime of the development. The management objectives will be to maintain a diverse mosaic of terrestrial habitats, ensure the continued functionality of refuge and hibernation features, and preserve habitat connectivity between the compensation area and surrounding habitats.

Habitat management will include periodic scrub control to prevent excessive encroachment into retained grassland areas whilst maintaining structurally diverse scrub margins and transitional habitats. Grassland habitats will be managed through an appropriate cutting regime to prevent the development of rank vegetation and scrub dominance whilst retaining sufficient cover and foraging opportunities for amphibians. Any invasive or non-native plant species identified within the compensation area will be controlled where necessary.

Hibernacula, brash piles, log piles and artificial refugia will be inspected periodically to assess their condition and functionality. Where features have degraded significantly through natural decomposition or disturbance, replacement or supplementary features will be installed to ensure that sufficient refuge opportunities continue to be available. Scrapes will also be monitored to assess water retention, vegetation establishment and overall suitability for amphibians and invertebrates. Where necessary, remedial works will be undertaken to maintain their ecological value.

A programme of ecological monitoring will be undertaken by a suitably qualified ecologist to assess the effectiveness of the mitigation and compensation measures. Monitoring will include periodic inspections of habitat condition and targeted surveys for GCNs within the Habitat Management Area and adjacent habitats as required. The frequency and duration of monitoring will be agreed with Natural Resources Wales (NRW) as part of the derogation licence requirements. Monitoring will be undertaken in accordance with the Wales GCN Monitoring Scheme, and data will be submitted by 30 September each year for the surveys undertaken.

Monitoring results will be reviewed against the objectives of the habitat management strategy and, where necessary, adaptive management measures will be implemented to address any identified issues. This approach will ensure that the GCN Habitat Management Area continues to function as a high-quality habitat resource for GCNs and will contribute towards the restoration of favourable conservation status.

5 Conclusions

GCN surveys undertaken in ponds within the surrounding area confirmed the presence of a breeding population of GCN, with a small population identified within the ponds surveyed. Although no ponds are present within the site itself, the close proximity of occupied ponds and the presence of suitable terrestrial habitat, including grassland, scrub, woodland and areas of degraded hardstanding, indicate that the site is likely to be used by GCNs for foraging, sheltering, dispersal and, potentially, hibernation.

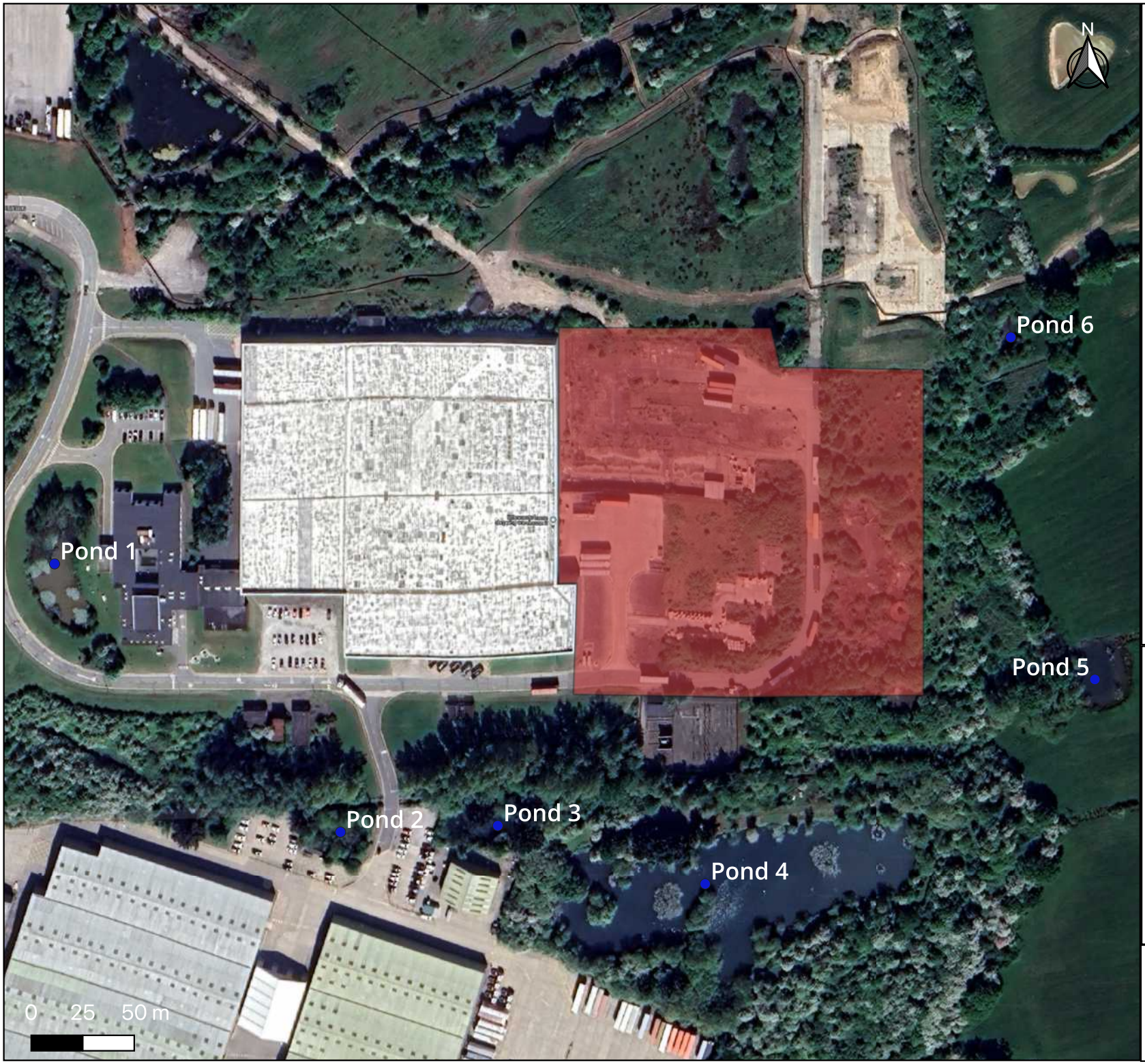
In the absence of mitigation, the proposed development would have the potential to result in the disturbance, injury or mortality of individual GCNs during site clearance and construction activities, together with the loss and fragmentation of terrestrial habitat used by the species. The development also has the potential to create operational risks associated with drainage infrastructure.

To address these impacts, a comprehensive mitigation strategy will be implemented under a derogation licence issued by NRW. Measures will include staged vegetation clearance during the active season, supervised removal of refugia, installation of amphibian exclusion fencing, trapping and translocation, the potential use of GCN detection dogs, and destructive searching where required. Operational mitigation measures will also be incorporated into the drainage design to minimise the risk of amphibian entrapment.

In addition, a dedicated 1.6ha GCN Habitat Management Area will be established and managed for the benefit of the species. This area will provide a range of habitat enhancements including scrub management, creation of shallow scrapes, construction of hibernacula, provision of brash and log piles, and installation of artificial refugia. These measures will increase the availability of high-quality terrestrial habitat and improve habitat connectivity within the local landscape. The compensation area will be subject to a programme of long-term management and ecological monitoring to ensure that habitat objectives are achieved and maintained over time.

Subject to the successful implementation of the mitigation, compensation, management and monitoring measures outlined in this report, the proposed development is not expected to adversely affect the favourable conservation status of the local GCN population. Indeed, the provision of dedicated compensation habitat and its long-term management is expected to provide a net benefit for the species and contribute to the maintenance and enhancement of the local population in the long term.

Figure 1 – Pond Location Plan



Development Area (indicative)

Ponds

Figure 1: Pond Location Plan

EOP

Produced by: LB

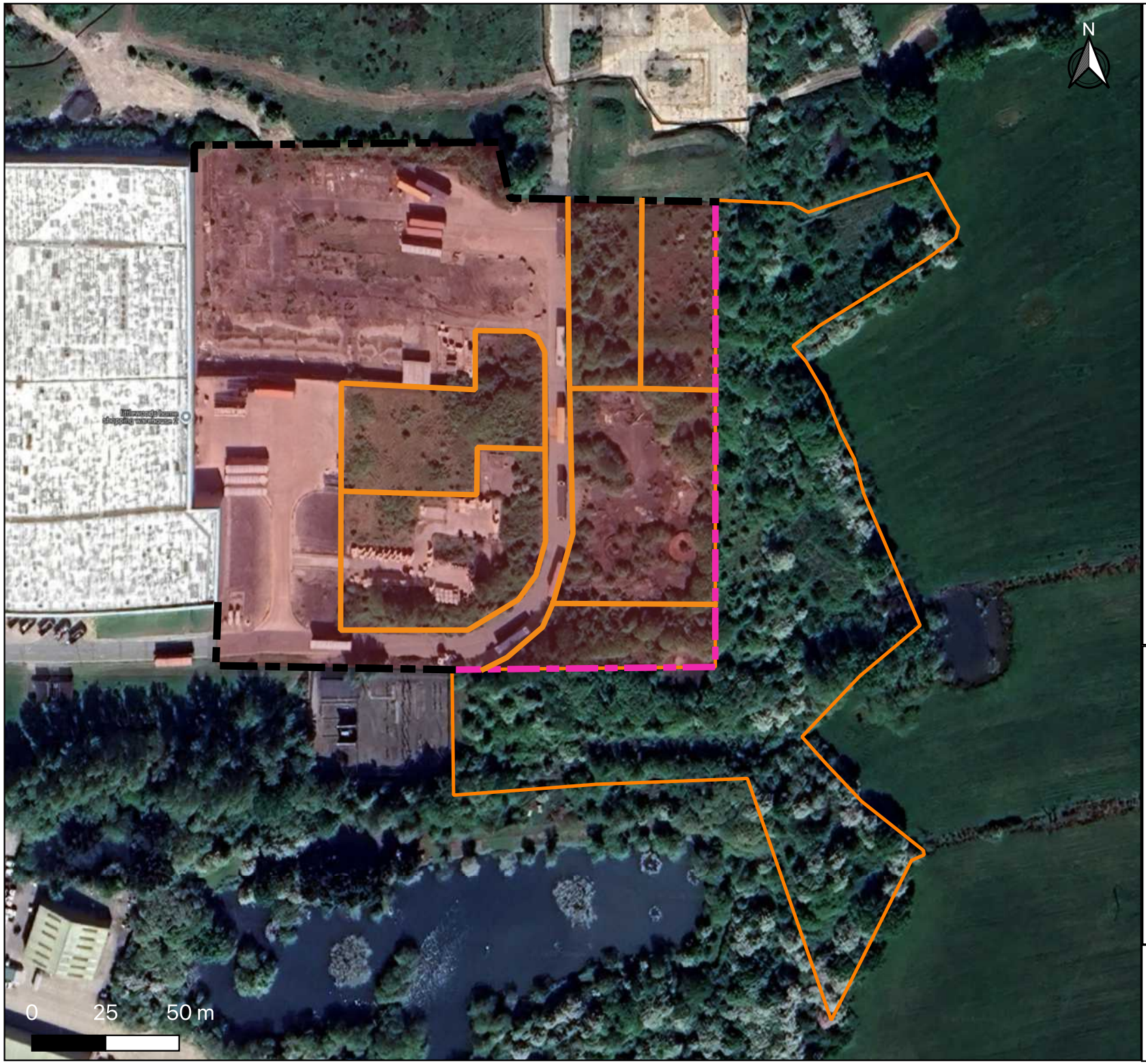
Rev01

02/06/2026

Map data:Google, QuickMapServices@2026

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Figure 2 – GCN Fencing Plan (Indicative)



Development Area (indicative)

Ecological Habitat Management Area

GCN semi-permanent boundary fencing

One-way semi-permanent GCN fencing

GCN drift fencing

Figure 2: Draft GCN Fencing Plan

EOP

Produced by: LB

Rev01

02/06/2026

Map data:Google, QuickMapServices@2026

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Figure 3 – GCN Habitat Management Area Plan (indicative)



Development Area (indicative)

Ecological Habitat Management Area

Hibernacula (indicative locations)

Shallow, ephemeral scrapes (indicative locations)

Selective scrub thinning (avoiding wet woodland areas)

Figure 3: Ecological Habitat Management Area

EOP

Produced by: LB

Rev01

22/05/2026

Map data:Google, QuickMapServices@2026

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Appendices

Appendix A. GCN Survey Results

Pond 1

Survey Number	Survey 1	Survey 2	Survey 3	Survey 4	Survey 5	Survey 6
Date	15/04/26	22/04/2026	05/05/2026	12/05/2026	19/05/2026	01/06/2026
Surveyors	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB
Egg search	X	X	X	X	X	X
Net	X	X	X	X	X	X
Torch	X	X	X	X	X	X

Results

GCN M	0	0	0	0	0	0
GCN F	0	0	0	0	0	0
GCN U	0	0	0	0	0	0
GCN J	0	0	0	0	0	0
GCN L	0	0	0	0	0	0
SM	0	0	0	0	0	0
SF	0	0	0	0	0	0
PM	0	0	0	0	0	0
PF	0	0	0	0	0	0
SPF	0	0	0	0	0	0
SPJ	0	0	0	0	0	0
SPL	0	0	0	0	0	0
Frog	0	0	0	0	0	0
Toad	0	0	0	0	0	0
Fish	Yes	Yes	Yes	Yes	Yes	Yes
Other	0	0	0	0	0	0
% Survyed	75	75	75	75	75	75
Water temp C	13.0	13.4	13.2	14.8	14.9	18.2
Air temp C	10	14	12	12	15	17
Rain	No	No	No	No	No	Light
Turbidity	3	3	3	3	3	3
Bright moonlight	No	No	No	No	No	No
Breeding birds	Yes - Canada geese	Yes - Canada geese	Yes - Canada geese	No (now fledged)	No	No
Wind disturbance	No	No	No	No	No	No

Key

GCN M	GCN Male	SM	Smooth male
GCN F	GCN Female	SF	Smooth female
GCN U	GCN Unknown	PM	Palmate male
GCN J	GCN Juvenile	PF	Palmate female
GCN L	GCN Larvae	SPF	Smooth/Palmate Female
		SPJ	Smooth/Palmate Juvenile
		SPL	Smooth/Palmate Larave
		SPU	Smooth/Palmate Unknown

Pond 2

Survey Number	Survey 1	Survey 2	Survey 3	Survey 4	Survey 5	Survey 6
Date	15/04/26	22/04/2026	05/05/2026	12/05/2026	19/05/2026	01/06/2026
Surveyors	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB
Egg search	X	X	X	X	X	X
Net	X	X	X	X	X	X
Torch	X	X	X	X	X	X

Results

GCN M	0	0	0	0	0	0
GCN F	0	0	0	0	0	0
GCN U	0	0	0	0	0	0
GCN J	0	0	0	0	0	0
GCN L	0	0	0	0	0	0
SM	0	0	0	0	0	0
SF	0	0	0	0	0	0
PM	0	0	0	0	0	0
PF	0	0	0	0	0	0
SPF	0	0	0	0	0	0
SPJ	0	0	0	0	0	0
SPL	0	0	0	0	0	0
Frog	0	0	0	0	0	0
Toad	0	0	0	0	0	0
Fish	No	No	No	No	No	No
Other	0	0	0	0	0	0
% Survyed	20	20	20	20	20	20
Water temp C	11.4	11.8	11.5	11	11.7	15.7
Air temp C	10	14	12	12	15	17
Rain	No	No	No	No	No	Light
Turbidity	1	1	1	1	1	2
Bright moonlight	No	No	No	No	No	No
Breeding birds	No	No	No	No	No	No
Wind disturbance	No	No	No	No	No	No

Key

GCN M	GCN Male	SM	Smooth male
GCN F	GCN Female	SF	Smooth female
GCN U	GCN Unknown	PM	Palmate male
GCN J	GCN Juvenile	PF	Palmate female
GCN L	GCN Larvae	SPF	Smooth/Palmate Female
		SPJ	Smooth/Palmate Juvenile
		SPL	Smooth/Palmate Larave
		SPU	Smooth/Palmate Unknown

Pond 3

Survey Number	Survey 1	Survey 2	Survey 3	Survey 4	Survey 5	Survey 6
Date	15/04/26	22/04/2026	05/05/2026	12/05/2026	19/05/2026	01/06/2026
Surveyors	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB
Egg search	X	X	X	X	X	X
Net	X	X	X	X	X	X
Torch	X	X	X	X	X	X

Results

GCN M	0	0	0	0	0	0
GCN F	0	0	0	0	0	0
GCN U	0	0	0	0	0	0
GCN J	0	0	0	0	0	0
GCN L	0	0	0	0	0	0
SM	0	0	0	0	0	0
SF	0	0	0	0	0	0
PM	0	0	0	0	0	0
PF	0	0	0	0	0	0
SPF	0	0	0	0	0	0
SPJ	0	0	0	0	0	0
SPL	0	0	0	0	0	0
Frog	0	0	0	0	0	0
Toad	0	0	0	0	0	0
Fish	Unknown	Unknown	Unknown	Possible (rises seen)	Possible (rises seen)	Unknown
Other	0	0	0	0	0	0
% Survyed	10	10	10	10	10	10
Water temp C	11.3	11.7	13.3	13	13.7	16.9
Air temp C	10	14	12	12	15	17
Rain	No	No	No	No	No	Light
Turbidity	2	2	2	2	2	3
Bright moonlight	No	No	No	No	No	No
Breeding birds	Yes - Canada geese	Yes - Canada geese	Yes - Canada geese	No - breeding failed	No	No
Wind disturbance	No	No	No	No	No	No

Key

GCN M	GCN Male	SM	Smooth male
GCN F	GCN Female	SF	Smooth female
GCN U	GCN Unknown	PM	Palmate male
GCN J	GCN Juvenile	PF	Palmate female
GCN L	GCN Larvae	SPF	Smooth/Palmate Female
		SPJ	Smooth/Palmate Juvenile
		SPL	Smooth/Palmate Larave
		SPU	Smooth/Palmate Unknown

Pond 5

Survey Number	Survey 1	Survey 2	Survey 3	Survey 4	Survey 5	Survey 6
Date	15/04/26	22/04/2026	05/05/2026	12/05/2026	19/05/2026	01/06/2026
Surveyors	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB
Egg search	X	X	X	X	X	X
Net	X	X	X	X	X	X
Torch	X	X	X	X	X	X

Results

GCN M	0	0	0	0	0	0
GCN F	0	0	0	0	0	0
GCN U	0	0	0	0	0	0
GCN J	0	0	0	0	0	0
GCN L	0	0	0	0	0	0
SM	0	0	0	0	0	0
SF	0	0	0	0	0	0
PM	0	0	0	0	0	0
PF	0	0	0	0	0	0
SPF	0	0	0	0	0	0
SPJ	0	0	0	0	0	0
SPL	0	0	0	0	0	0
Frog	0	0	0	0	0	0
Toad	Yes - tadpoles	Yes - tadpoles	Yes - tadpoles	Yes - tadpoles	No	No
Fish	No	Yes	Yes	Yes	Yes	Yes
Other	0	0	0	0	0	0
% Survyed	100	100	100	100	100	100
Water temp C	12.1	14.2	12.7	13.7	15	18
Air temp C	10	14	12	12	15	17
Rain	No	No	No	No	No	Light
Turbidity	1	2	1	2	2	2
Bright moonlight	No	No	No	No	No	No
Breeding birds	No	No	No	No	No	No
Wind disturbance	No	No	No	No	No	No

Key

GCN M	GCN Male	SM	Smooth male
GCN F	GCN Female	SF	Smooth female
GCN U	GCN Unknown	PM	Palmate male
GCN J	GCN Juvenile	PF	Palmate female
GCN L	GCN Larvae	SPF	Smooth/Palmate Female
		SPJ	Smooth/Palmate Juvenile
		SPL	Smooth/Palmate Larave
		SPU	Smooth/Palmate Unknown

Pond 6

Survey Number	Survey 1	Survey 2	Survey 3	Survey 4	Survey 5	Survey 6
Date	15/04/26	22/04/2026	05/05/2026	No access 12/05	19/05/2026	01/06/2026
Surveyors	LB and CB	LB and CB	LB and CB		LB and CB	LB and CB
Egg search	X	X	X		X	X
Net	X	X	X		X	X
Torch	X	X	X		X	X
Results						
GCN M	0	1	0		0	0
GCN F	1	1	0		0	0
GCN U	0	0	0		0	0
GCN J	0	0	0		0	0
GCN L	0	0	0		0	0
SM	0	1	0		0	0
SF	0	0	0		0	0
PM	0	0	0		0	0
PF	0	0	0		0	0
SPF	2	1	2		0	1
SPJ	0	0	0		0	0
SPL	0	0	0		0	5
SPU	0	0	0		2	0
Frog	0	0	0		0	0
Toad	0	0	0		0	0
Fish	No	No	No		No	No
Other	0	0	0		0	0
% Survyed	100	100	100		100	100
Water temp C	13	13	11.9		15.4	18
Air temp C	10	14	12		12	17
Rain	No	No	No		No	Light
Turbidity	1	1	1		1	1
Bright moonlight	No	No	No		No	No
Breeding birds	No	No	No		No	No
Wind disturbance	No	No	No		No	No

Key

GCN M	GCN Male	SM	Smooth male
GCN F	GCN Female	SF	Smooth female
GCN U	GCN Unknown	PM	Palmate male
GCN J	GCN Juvenile	PF	Palmate female
GCN L	GCN Larvae	SPF	Smooth/Palmate Female
		SPJ	Smooth/Palmate Juvenile
		SPL	Smooth/Palmate Larave
		SPU	Smooth/Palmate Unknown

Temporary pools

Survey Number	Survey 1	Survey 2	Survey 3	Survey 4	Survey 5	Survey 6
Date	15/04/26	22/04/2026	Pools no longer present	Pools no longer present	Pools no longer present	Pools no longer present
Surveyors	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB	LB and CB
Egg search	n/a	n/a				
Net	n/a	n/a				
Torch	X	X				

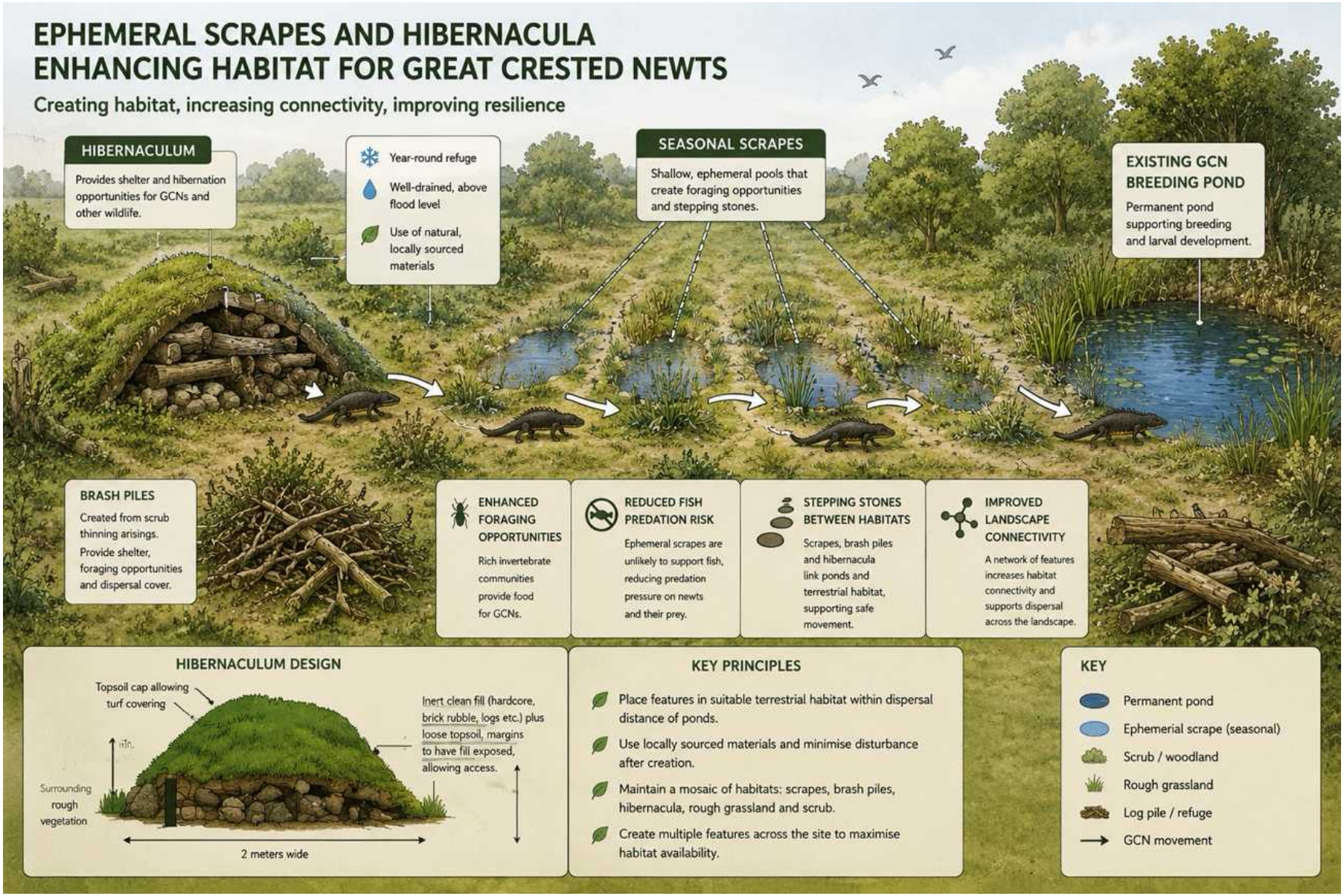
Results

GCN M	0	0
GCN F	0	0
GCN U	0	0
GCN J	0	0
GCN L	0	0
SF	1	0
PM	0	0
PF	0	0
SPF	0	0
SPJ	4	0
SPL	0	0
Frog	0	0
Toad	0	0
Fish	0	0
Other	0	0
% Survyed	100	100
Water temp	N/A	N/A
Air temp	10	14
Rain	No	No
Turbidity	1	1
Bright moonlight	No	No
Breeding birds	No	No
Wind disturbance	No	No

Key

GCN M		SM	Smooth male
GCN F	GCN Male	SF	Smooth female
GCN U	GCN Female	PM	Palmate male
GCN J	GCN Unknown	PF	Palmate female
GCN L	GCN Juvenile	SPF	Smooth/Palmate Female
	GCN Larvae	SPJ	Smooth/Palmate Juvenile
		SPL	Smooth/Palmate Larave
		SPU	Smooth/Palmate Unknown

Appendix B. GCN Habitat Compensation and Enhancement Measures


EPHEMERAL SCRAPES AND HIBERNACULA
ENHANCING HABITAT FOR GREAT CRESTED NEWTS
Creating habitat, increasing connectivity, improving resilience
HIBERNACULUM
Provides shelter and hibernation opportunities for GCNs and other wildlife.
Year-round refuge
Well-drained, above flood level
Use of natural, locally sourced materials
SEASONAL SCRAPES
Shallow, ephemeral pools that create foraging opportunities and stepping stones.
EXISTING GCN BREEDING POND
Permanent pond supporting breeding and larval development.
BRASH PILES
Created from scrub thinning arisings.
Provide shelter, foraging opportunities and dispersal cover.
ENHANCED FORAGING OPPORTUNITIES
Rich invertebrate communities provide food for GCNs.
REDUCED FISH PREDATION RISK
Ephemeral scrapes are unlikely to support fish, reducing predation pressure on newts and their prey.
STEPPING STONES BETWEEN HABITATS
Scrapes, brash piles and hibernacula link ponds and terrestrial habitat, supporting safe movement.
IMPROVED LANDSCAPE CONNECTIVITY
A network of features increases habitat connectivity and supports dispersal across the landscape.
HIBERNACULUM DESIGN
Topsoil cap allowing turf covering
Inert clean fill (hardcore, brick rubble, logs etc.) plus loose topsoil, margins to have fill exposed, allowing access.
Surrounding rough vegetation
2 meters wide
KEY PRINCIPLES
Place features in suitable terrestrial habitat within dispersal distance of ponds.
Use locally sourced materials and minimise disturbance after creation.
Maintain a mosaic of habitats: scrapes, brash piles, hibernacula, rough grassland and scrub.
Create multiple features across the site to maximise habitat availability.
KEY
Permanent pond
Ephemerial scrape (seasonal)
Scrub / woodland
Rough grassland
Log pile / refuge
GCN movement

Appendix C. Response to NRW Comments

ECOLOGY CONSULTING

09/07/2026

Wrexham – Land off Bryn Lane – Ecology – NRW Comments Tracker

GCN Survey Report and Outline Mitigation Strategy

NRW Comment	Response
We note the desk top study carried out in support of this planning application, however no reference has been made to the previous large population of GCN to the west of the application site nor the c500 GCN translocated in relation to the development to the north of the application. This should be considered	Additional background information has been added to the report.
Section 2.3 describes some of the limitations encountered during the GCN survey, however no reference is made to the dry winter-spring of 2026 and how this may impact on survey results. We advise that section 2.3 is updated to include reference to this and potential impacts on the survey results	Text has been updated to include the required information.
Section 3.4 states that there are no ponds on site. Figure 1: Pond Location Plan shows the locations of 6 ponds all to be outside of the indicative development area. However, based on the submitted application red line boundary, pond 6 is shown to within the application site. We advise that section 3.4 is amended to reflect this	This is incorrect, the redline boundary clearly shows Pond 6 is located outside of the site. An image has been inserted into the updated report to clearly show this.
No reference is made within section 3 to the national significance of the GCN population within and in the environs of Wrexham Industrial Estate. There is also no reference to, or consideration of the current conservation status of the population being unfavourable or reference to the importance of nearby sites which include dedicated GCN compensation areas. We advise section 3 is updated to include these	Text has been added as requested.
Section 4.2 states that an area of approximately 1.61 hectares (Ha) will be "designated as a dedicated GCN Habitat Management Area". The	Disagree. Additional information has been added to the report to explain the

proposed mitigation fails to consider the requirement to demonstrate no detriment to the maintenance (or restoration) of the favourable conservation status of the local population of GCN. We advise that the extent of the proposed GCN area is insufficient when considered against the 'like for like' principle as set out in the Local Planning Guidance Note No 29 We advise that a losses and gains table should be included in an updated report to clearly show, in Ha: ○ Extent of the application red-line boundary ○ Existing hardstanding and 'green' areas ○ Proposed hardstanding and designated GCN Habitat Management Area	justification including habitat loss/gains tables.
We also advise that the proposed GCN Habitat Management area is extended along the southern boundary of the application site to ensure continued and improved connectivity with other suitable habitats within Wrexham Industrial Estate.	Disagree as above comment, also note that the woodland south of the southern boundary isn't within client ownership or the redline.
Section 4.2.3 provides details on the creation of shallow ephemeral scrapes within the GCN Habitat Management Area. We advise that deeper ponds are also incorporated within this area, as shallow scrapes alone are unlikely to provide the full range of aquatic habitat required by great crested newts. A mosaic of waterbodies with varying depths is necessary to support breeding, larval development and population resilience, and is therefore important in maintaining the favourable conservation status of the population.	Disagree as no aquatic habitat is being lost and a large amount of ponds have been created nearby – additional text added to justify this.
We advise that the monitoring methodology should accord with the Wales GCN Monitoring scheme. The results should be reported through their	Text added to include this commitment.

online database and all data shall be uploaded by 30 September each year.	