THE ENVIRONMENT PARTNERSHIP



LAND SOUTH OF BRYN LANE

WREXHAM

GCN CONSERVATION PLAN

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G10204.009 Great Crested Newt Fencing Plan

EXECUTIVE SUMMARY

1.1 The Environment Partnership (TEP) was commissioned by Mauna Kea Limited, a fully owned subsidiary of Net World Sports (hereafter referred to as 'the client') to complete a great crested newt (GCN) Conservation Plan for land to the south of Bryn Lane within Wrexham Industrial Estate in Wrexham (approximate central grid ref: SJ 38450 50752).

1.2 The Proposed Development will deliver high quality employment floorspace, housed within a single building alongside an improved access off Bryn Lane and landscaping. The proposals are provided in Annex 1.

1.3 The works will result in the loss of an area of semi-improved grassland, a section of young, plantation woodland and a single small building. Additionally, it is anticipated that works will result in the loss of three scattered trees and small areas of dense scrub and scattered shrubs.

1.4 The southern and eastern margins of the site will be retained and enhanced for GCN, with the proposals retaining the existing wet ditch and most of the scattered trees and dense scrub at the site boundaries. The majority of the plantation woodland, hedgerows and dense scrub present on the northern boundary will also be retained. New habitat creation will be undertaken with the planting of new native trees and shrubs, and the creation of a new pond in the south of the site. Log piles and hibernacula will also be constructed as part of the proposals.

1.5 The desk study and field surveys found no evidence of GCN presence on site. However, the site contains a single waterbody in the form of a wet drainage ditch and there is optimal terrestrial habitat for GCN along the southern and eastern boundaries, which is connected to other waterbodies within 500m to the site via a woodland corridor and the ditch to the south-east. As a result, there is a low potential for GCN to range onto the site and the proposed works may have the potential to kill, injure and disturb GCN, and damage or destroy their resting places.

1.6 Therefore, prior to the commencement of works in Summer 2026 (subject to the granting of relevant planning permissions), temporary one-way amphibian fencing (TAF) will be installed around the perimeter of the site. The proposed layout for the fencing is illustrated in drawing G10204.009. All TAF will remain in place for the duration of the works.

1.7 During the construction process, an ecological compliance audit scheme carried out by an externally appoint body will be instated. This will involve four visits per year, for each year that construction works are ongoing.

1.8 Monitoring to ensure that the on-site retention and enhancement scheme for GCN is achieved will be undertaken by TEP for at least 25 years. Annual population monitoring will be undertaken for the new pond and existing ditch utilising all of the following three survey methods: torch surveys, bottle trapping and egg-searching. Mauna Kea Limited will consult with NRW regarding the monitoring methods and all monitoring will be supported by annual eDNA surveys within the optimal survey season. The results of the monitoring will be reported as part of the Welsh GCN Monitoring Scheme, with all data uploaded by 30th September each year. This long-term monitoring will measure the success of the objectives against the following Key Performance Indicators (KPI):

- Waterbodies contain GCN, with a target population of at least 25 GCN per waterbody;
- Waterbodies are holding water during the breeding season;
- Waterbodies are vegetated and contain adequate breeding habitat for GCN;
- Each waterbody contains open water covering at least 50% of its area;
- No fish or invasive non-native species (INNS) are present within waterbodies;
- All habitats meet their desired conditions as detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4).

1.9 Habitat management will be overseen by Mauna Kea Limited and undertaken by an appropriate landscape management company and ecological consultants. Site inspection and a review of the management plans would be undertaken once yearly, informed by quarterly meetings with NRW. All GCN surveys will be carried out by licenced ecologists. If habitats are found to be falling short of their desired conditions, remediation measures will be undertaken, as detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4).

INTRODUCTION

Background to Activity/Development

1.10 The Environment Partnership (TEP) was commissioned Mauna Kea Limited, a fully owned subsidiary of Net World Sports, (hereafter referred to as 'the client') to complete a great crested newt (GCN) Conservation Plan for land to the south of Bryn Lane within Wrexham Industrial Estate, Wrexham (approximate central grid ref: SJ 38450 50752).

1.11 The Proposed Development will deliver high quality employment floorspace, housed within a single building alongside an improved access off Bryn Lane and landscaping. The proposals are illustrated in Annex 1.

1.12 TEP has previously undertaken ecological surveys and reports for the site, and this GCN Conservation Plan should be read in conjunction with the following (found in Annexes 3-5):

- Land south of Bryn Lane - Ecological Desk Study (TEP Report Ref: 10204.001 V2);
- Land south of Bryn Lane - Ecological Impact Assessment (TEP Report Ref: 10204.002 V5);
- Land south of Bryn Lane - Landscape and Ecological Management Plan (TEP Report Ref: 10204.004 V4)

1.13 The Proposed Development has the potential to kill, injure and disturb GCN, and damage or destroy their resting places. Therefore, following a review of the above reports, and in consultation with Wrexham County Borough Council, Natural Resources Wales (NRW) have requested additional information to ensure proposals demonstrate no detriment to the maintenance of the favourable conservation status of GCN (NRW Refs: CAS-281608-J6V1 and CAS-287515-B2Y6).

1.14 The requested information is as follows:

- The submission (to include proposed timescales and reporting requirements) of further details and associated plans concerning GCN avoidance and mitigation measures including, but not limited to:
  - fence specifications, locations, construction and maintenance (one-way amphibian fence, prior to and throughout the duration of construction operations)
  - considerations of access issues
  - monitoring and maintenance requirements and supervised removal.
- Details of habitat retention, enhancement and creation proposals associated with terrestrial and aquatic habitats. Details to include plans and timescales.
- The submission of a long-term site management plan (not less than 25 years) that includes:
  - details of habitats and ecological features present or to be created, both in written form and shown on appropriate drawings, including planting plans.

  - defined aims and objectives (including defined key performance indicators for long term monitoring indicators).
  - details of monitoring methodologies for habitat(s) and species.
  - contingency measures if fish or invasive non-native species (INNS) are detected.
  - current and any proposed changes to the freehold tenure of the compensation area (tenure of the ecology and heritage area to be approved by the Local Planning Authority).
  - persons or bodies responsible for undertaking management and surveillance together with required skills and competencies.
  - sufficient information regarding site liaison has been provided, however, no details regarding site wardening have been provided.
  - the submitted plan fails to consider licensing and competency requirements regarding management and surveillance aims and objectives are unsatisfactory in respect of great crested newt. Further information should be submitted in respect of species-specific aims and objectives.
  - details of reporting, review and update of the plan (informed by monitoring) at specific intervals as agreed.
- The submission of detailed measures including plans designed to prevent the accidental capture/killing of GCN during operational phases of the scheme, including the installation and maintenance of an amphibian-friendly surface water management system that does not include gully pots (or other similar features).
- Details of timing, phasing and duration of construction activities and conservation measures.
- Post-construction monitoring and record dissemination for a period of not less than 25 years. Methodology shall include annual GCN abundance counts and Habitat Suitability Index (HSI) assessments. All ponds (including SuDS water bodies) to be added to the Wales GCN Monitoring Scheme, with individuals/bodies being identified as being responsible for monitoring and reporting works.

1.15 The consultation advised this information could be submitted in the form of a GCN Conservation Plan.

1.16 A table listing the above queries and displaying the paragraph numbers within this document which address each of these is provided in Annex 3.

Full details of proposed works

1.17 The Proposed Development would involve the construction of an industrial unit, alongside the creation of improved access off Bryn Lane and soft landscaping works. The proposed layout, specifications and planting plans for the site can be found in the Landscape Masterplan (Nicholsons ref: 1059-01-NLD.151, V6.0), which is provided in Annex 1.

1.18 The works will result in the loss of an area of semi-improved grassland, a section of young, plantation woodland and a single small building. Additionally, it is anticipated that works will result in the loss of three scattered trees and small areas of dense scrub and scattered shrubs.

1.19 The southern and eastern margins of the site will be retained and enhanced for GCN, with the proposals retaining the existing wet ditch and most of the scattered trees and dense scrub at the site boundaries. The majority of the plantation woodland, hedgerows and dense scrub present on the northern boundary will also be retained. New habitat creation will be undertaken with the planting of new native trees and shrubs, and the creation of a new pond in the south of the site. Log piles and hibernacula will also be constructed as part of the proposals.

1.20 During works, the site will have a single point of access, which will be taken via the existing field access from Bryn Lane. This access will be widened to facilitate the development, resulting in the loss of a small amount of adjacent woody vegetation.

1.21 An amphibian-friendly surface water management system will be installed and maintained on site. This will not include gully pots (or other similar features).

1.22 Prior to the commencement of works, temporary one-way amphibian fencing (TAF) will be installed around the perimeter of the works area for the duration of works. The proposed specification of the TAF is provided in Annex 2 and the proposed layout is illustrated in drawing G10204.009 respectively.

1.23 Subject to the granting of relevant planning permissions, it is proposed that the TAF would be installed in March/April 2026. Following the installation of the TAF, the construction phase is anticipated to take 18 to 24 months.

1.24 To determine whether the on-site mitigation is meeting its objectives, the new on-site pond will be subject to yearly HSI assessments and eDNA surveys within the optimal season, and yearly population monitoring for at least 25 years post-development. Population monitoring will be undertaken for the pond utilising all of the following three survey methods: torch surveys, bottle trapping and egg-searching. Mauna Kea Limited will consult with NRW on the monitoring methods and the results of the monitoring will be reported as part of the Welsh GCN Monitoring Scheme, with all data uploaded by 30th September each year.

1.25 The desired condition of each of the habitats to be created, the criteria for monitoring these conditions, and the proposed management methods for achieving these conditions are detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4).

SURVEY & SITE ASSESSMENT

Existing information on great crested newts at the survey site

1.26 There are several statutory designated sites within a 10km radius of the site, which are detailed within the Ecological Desk Study (TEP Report Ref: 10204.001).

1.27 The following records of amphibians were returned from within 2km of the site:

- 25 records of great crested newt (GCN) *Triturus cristatus*;
- 27 records of smooth newt *Lissotriton vulgaris*;
- 17 records of common frog *Rana temporaria*;
- 11 records of common toad *Bufo bufo*;
- 7 records of palmate newt *Lissotriton helveticus*; and
- 22 records of unidentified small newt species *Lissotriton spp*.

1.28 The closest record of GCN was located 100m to the north-east of the site boundary, although this record is separated from the site by Bryn Lane, which is a busy B-road with kerbs and is considered a barrier to amphibian movement. There were no pre-existing records of GCN within 500m of the site that were not separated from the site by Bryn Lane.

1.29 A review of satellite and OS imagery revealed that the site contains a single waterbody in the form of a drainage ditch at the southern boundary. Additionally, there are at least six waterbodies within 500m of the site boundary. Three of these waterbodies are separated from the site by Bryn Lane. The remaining three waterbodies are located to the east (150m away from site) and south (280m and 480m away respectively), and are not separated from the site by any major barriers to amphibian movement. None of these waterbodies were found to have pre-existing records of GCN.

1.30 It is understood that an ongoing compensation scheme for GCN is present to the south-east of the site. This scheme is connected to the site via a woodland corridor, although the ponds within the scheme are over 500m from the site boundary.

1.31 The site has good connectivity to the south-east via the woodland corridor and a wet ditch which enters the site at its southern boundary.

Field survey methods

1.32 To assess the value of the existing on-site habitats for GCN, an extended Phase 1 Habitat survey was undertaken on 8th November 2023 by a suitably qualified TEP ecologist (FISC Level 4).

1.33 To determine the presence or likely absence of GCN on site, an environmental DNA (eDNA) survey of the on-site ditch was undertaken by a licenced TEP ecologist in April 2024.

Field survey results

1.34 Drawing G10204.007A shows the habitats present within the site.

1.35 The habitat survey identified on-site habitats that are suitable for breeding, foraging, ranging and hibernating amphibians (TEP Report Ref: 10204.002 V2)

1.36 It was confirmed that there is suitable breeding habitat for amphibians in the form of a drainage ditch. However, the on-site ditch tested negative for GCN eDNA.

1.37 The eastern and southern boundaries of the site contained optimal terrestrial habitat for amphibians with foraging and resting opportunities and connectivity to the ponds in the wider landscape to the south.

1.38 At the time of the survey, there were also piles of cleared brash and scrub that could provide suitable hibernacula for amphibians. No evidence of amphibians was found on site.

1.39 A single invasive species was identified on site in the form of New Zealand pigmyweed *Crassula helmsii* (WCA9), which was located immediately to the north of the drainage ditch (TN4 on G10204.007A).

Interpretation/evaluation of survey results

1.40 The habitat walkover and eDNA survey did not reveal any evidence of GCN presence on site.

1.41 However, the site contains a suitable waterbody in the form of a wet ditch and there is optimal terrestrial habitat for GCN along the southern and eastern boundaries, which is connected to other waterbodies within 500m to the site via a woodland corridor and the ditch to the south-east.

1.42 Therefore, there is a low possibility that GCN will range onto the site during works.

IMPACT ASSESSMENT

1.43 During the construction phase of the Proposed Development, there is the potential to kill, injure and disturb GCN

Short-term impacts: disturbance

1.44 There is a low risk that GCN could be present on site at the time of construction works, or that GCN could enter the development area whilst works or events are ongoing and be injured or killed. Under the relevant legislation, it is an offence to knowingly kill, harm or injure GCN. In the absence of mitigation works this could have a high impact as set out in English Nature Mitigation Guidelines 2001.

Long-term impacts: site modification

1.45 The existing waterbody on site will be retained. There will be a permanent loss of terrestrial habitat during construction; however, this will primarily be confined to the semi-improved grassland and an area of young, plantation woodland. The optimal terrestrial habitats for GCN on site (the eastern and southern boundaries) will be retained and enhanced post-development.

Long-term impacts: site loss

1.46 The works will result in the loss of a large area of semi-improved grassland, a section of young, plantation woodland and a small building. Additionally, it is anticipated that works will result in the loss of three scattered trees and small areas of dense scrub and scattered shrubs.

Long-term impacts: fragmentation and isolation

1.47 The site is primarily connected to the surrounding landscape via its southern and eastern boundaries, with limited connectivity to the north and west.

1.48 Connectivity along the southern and eastern boundaries will be maintained as access will be taken via the existing field entrance to the north and the southern and eastern margins of the site will be protected by TAF. Connectivity will be enhanced with the creation of a new pond in the south of the site and new native tree and shrub planting.

Post-development interference impacts

1.49 The retained and enhanced habitats on site will be managed as habitat for GCN for at least 25 years. A post-and-rail fence is proposed to partition habitats from the industrial unit. Therefore, there will be no post-development interference impacts.

Predicted scale of impact

1.50 The overall scale of the impact of development in the absence of mitigation is considered to be minimal.

MITIGATION WORKS TO BE UNDERTAKEN

Great Crested Newt capture and exclusion

1.51 Prior to the commencement of works, temporary one-way amphibian fencing (TAF) will be installed around the perimeter of the parcel and remain for the duration of the proposed works. Subject to the granting of relevant planning permissions, the TAF will be installed in March/April 2026.

1.52 The proposed layout of this fencing is illustrated in drawing G10204.009.

1.53 The vertical fence will possess a top-curl and will be buried in the ground to a depth of 300mm. The anticipated specification for the vertical fence is provided in Annex 2.

1.54 All works will be supervised by a suitably experienced ecologist holding a NRW great crested newt licence. The area where the fencing will be installed will be subject to a hand search prior to installation. In the event newts are uncovered during fencing operations they will be moved to the receptor area, located beyond the TAF within the retained habitats along the southern and eastern boundaries on site.

1.55 Carpet tiles will be installed within the site along the TAF to monitor for GCN presence. Any GCN found under carpet tiles will be moved to the receptor area. The locations of the carpet tiles are illustrated on drawing G10204.009.

1.56 All contractors working on site will be given a toolbox talk by a suitably qualified ecologist. Biosecurity Risk Assessments will be distributed to contractors working on site.

1.57 The TAF will be inspected at least once every 24 hours by the supervising ecologist to ensure that the fences remain in a viable condition to prevent recolonisation of the site by amphibians. Any damage will be repaired the same day. A documented record of inspections and repairs shall be kept.

1.58 On completion of the development the perimeter fencing will be removed under supervision of a suitably qualified ecologist.

Great Crested Newt habitat

1.59 All suitable breeding habitat will be retained. The majority of the suitable resting habitat on site will be retained, though an area of young, plantation woodland, patches of dense scrub, and three trees are anticipated to be lost. The existing retained habitats within the southern and eastern boundaries have been identified as suitable receptor sites for GCN captured during the proposed works.

1.60 The proposed works will result in the creation of a new pond and enhanced terrestrial habitats for GCN. The aims of this habitat creation are as follows:

- That the pond will be colonised by GCN;
- That the pond will hold water during the GCN breeding season;
- That all habitats on site will meet and maintain their desired conditions as detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4) for at least 25 years.

1.61 The desired condition of each of the habitats to be created, the criteria for monitoring these conditions, and the proposed management methods for achieving these conditions are detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4).

1.62 Planting plans for the pond and terrestrial habitats are also provided within these documents.

1.63 Plans for the proposed habitat creation are provided in the Landscape Masterplan (Nicholsons Ref: 1059-01-NLD.151, V6.0), which is provided in Annex 1.

Mechanisms for ensuring delivery of mitigation and compensation measures

Measures to ensure the objectives of the conservation plan are met

1.64 During the construction process, an ecological compliance audit scheme will be instated with an independent auditor. This will involve four visits per year, for each year that construction works are ongoing. This will include defined key performance indicators for the desired condition of the new habitat creation as detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4) and be carried out by an externally appointed body, commissioned by Mauna Kea Limited.

1.65 Following the completion of works, monitoring to ensure that the objectives of the conservation plan are achieved will be undertaken by The Environment Partnership (TEP) under licence for at least 25 years. Site inspection and a review of the management plans would be undertaken once yearly, informed by quarterly meetings with NRW.

1.66 Site liaison and wardening will be undertaken by Mauna Kea Limited's consultants. These consultants will hold a NRW GCN licence and have experience with GCN mitigation sites.

1.67 Habitat management will be overseen by Mauna Kea Limited and undertaken by an appropriate wildlife body or landscape management company with the necessary licences to carry out works in relation to GCN or any other protected species noted at site. In addition to holding an NRW GCN licence, the skills and competencies required for this body will include, but not be limited to:

- Experience with GCN mitigation sites;
- Certificates of competence to undertake landscape management operations on site;
- Knowledge of habitat management techniques detailed within the Habitat Management Plans; and
- Sufficient awareness of new and ongoing biosecurity threats, and the necessary precautions to avoid their spread.

1.68 If habitats are found to be falling short of their desired conditions, remediation measures will be undertaken, as detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4).

Case study

1.69 The mitigation ponds created to the east of the Net World Sports Headquarters on Bryn Lane are currently being monitored by TEP and managed by the landscape management company Ecological Land Management.

1.70 Ecological Land Management are a contractor with an NRW GCN Licence and over 20 years of experience managing nature reserves and habitats, holding contracts with Natural England and other NGOs, including wildlife charity organisations.

1.71 Habitat management is ongoing, though the mitigation ponds have all been colonised by GCN and are considered to be in a good state. Survey data on these ponds is due to be provided to NRW and COFNOD in the form of an update monitoring report in autumn 2025.

Mitigation contingencies

1.72 If the one-way amphibian fence suffers major vandalism during construction works and is in need of major repairs then TEP shall be contacted immediately and the fence shall be repaired the same day.

1.73 If fish are found within the new pond, the pond shall be drained down and fish shall be removed under supervision of an ecologist. An ecologist will be consulted regarding the treatment of any other species found within the ponds.

1.74 The existing invasive non-native species on site (New Zealand pigmyweed) will be managed in accordance with the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4) and a treatment plan will be devised to remove this. If any additional invasive non-native species are identified on site, an exclusion zone will be erected around the INNS under supervision of an ecologist. An ecologist will be consulted regarding an appropriate treatment plan for the INNS.

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

Biosecurity risk assessment

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

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

1.77 A full biosecurity risk assessment will be included with the NRW GCN development licence application.

POST DEVELOPMENT SITE SAFEGUARD

Habitat/site management and maintenance

1.78 Monitoring to ensure that the objectives of the conservation plan are achieved will be undertaken by The Environment Partnership (TEP) under licence for at least 25 years. Site inspection and a review of the management plans would be undertaken once yearly, informed by quarterly meetings with NRW.

1.79 Site liaison and wardening will be undertaken by Mauna Kea Limited's consultants. Habitat management will be undertaken by an appropriate wildlife body or landscape management company with the necessary licences to carry out works in relation to GCN or any other protected species noted at site.

1.80 If habitats are found to be falling short of their desired conditions, remediation measures will be undertaken, as detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4).

Monitoring

1.81 To determine whether the on-site mitigation is meeting its objectives, the new pond and retained ditch will be subject to yearly Habitat Suitability Index (HSI) assessments and eDNA and population monitoring surveys for at least 25 years, starting with the completion of the construction phase by Summer 2028 (subject to granting of relevant planning permissions). These will be undertaken by TEP or an appropriate wildlife body. In addition to holding an NRW GCN licence, the skills and competencies required for this body will include, but not be limited to:

- Experience with GCN HSI/eDNA and population surveys; and
- Sufficient awareness of new and ongoing biosecurity threats, and the necessary precautions to avoid their spread.

1.82 GCN HSI/eDNA surveys will be undertaken between 15th April and 1st June. Surveyors will sample all waterbodies that are holding water at the time of the survey, using 1 sampling kit per waterbody and collecting 20 water samples per waterbody. Samples will be analysed by a suitably qualified and experienced laboratory.

1.83 GCN population monitoring surveys will utilise three survey methods per waterbody (torch surveys, bottle trapping and egg-searching) and involve six visits per year between mid-March and mid-June, with at least three visits taking place in the core period of mid-April to mid-May. Mauna Kea Limited will consult with NRW regarding the monitoring methods and the results of the monitoring will be reported as part of the Welsh GCN Monitoring Scheme, with all data uploaded by 30th September each year.

1.84 To ensure that habitats are meeting their desired conditions as detailed within the KPIs and the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4) these habitats will be subject to yearly site inspections for at least 25 years, starting with the completion of the construction phase by Summer 2028 (subject to granting of relevant planning permissions).

Key Performance Indicators

1.85 The Key Performance Indicators (KPI) for the on-site retention and enhancement scheme will be as follows:

- Waterbodies contain GCN, with a target population of at least 25 GCN per waterbody;
- Waterbodies are holding water during the breeding season;
- Waterbodies are vegetated and contain adequate breeding habitat for GCN;
- Each waterbody contains open water covering at least 50% of its area;
- No fish or invasive non-native species (INNS) are present within waterbodies;
- All habitats meet their desired conditions as detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4).

Reporting

1.86 The results of the GCN surveys and site inspections will be provided to NRW in the form of yearly monitoring reports, which will be compiled and issued by TEP or another appropriate wildlife body. Additionally, all ponds will be added to the Wales GCN Monitoring Scheme (with all data uploaded by 30th September each year) and all survey data will be submitted to COFNOD.

TIMETABLE OF WORKS

1.87 The timetable for construction works and mitigation creation is provided in Table 1, below (subject to granting of relevant planning permissions):

Table 1: Work Schedule

PROPOSED WORKS	TIME OF YEAR
Installation of TAF on site	Spring 2026
Construction phase, including: • Four ecological compliance audit scheme visits per year.	Summer 2026 to Summer 2028
Post-development monitoring, including: • Annual site inspection; • Annual review of HMP; • Annual GCN eDNA and population monitoring surveys; • Annual GCN monitoring reports to be issued to NRW; • Quarterly meetings with NRW; • Ongoing habitat management activities as specified in HMP.	2028-2053

1.88 Detailed timings for habitat management are provided within the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4).

1.89 A separate planning application has been submitted (Ref: P/2025/0431) for off-site compensation relating to this and two other developments at Wrexham Industrial Estate. This off-site compensation is referred to as the Strategic Ecological Corridor (SEC). The timetable for the creation of the SEC is provided in Table 2, below (subject to granting of relevant planning permissions):

Table 2: Work Schedule for Strategic Ecological Corridor (SEC)

PROPOSED WORKS	TIME OF YEAR
Parcel 4 pond creation and planting including: • Four ecological compliance audit scheme visits	Early 2026

PROPOSED WORKS	TIME OF YEAR
Parcels 1-3 pond and bund creation, and planting, including: • Four ecological compliance audit scheme visits.	Autumn 2026
Post-development monitoring of Parcels 4 and 5 including: • Annual site inspection; • Annual review of HMP; • Annual GCN eDNA and population monitoring surveys; • Annual GCN monitoring reports to be issued to NRW; • Quarterly meetings with NRW; • Ongoing habitat management activities as specified in HMP.	2026-2051
Post-development monitoring of Parcels 1-3: • Annual site inspection; • Annual review of HMP; • Annual GCN eDNA and population monitoring surveys; • Annual GCN monitoring reports to be issued to NRW; • Quarterly meetings with NRW; • Ongoing habitat management activities as specified in HMP.	2027-2052

LAND OWNERSHIP AND USE – MITIGATION SITE/COMPENSATION SITE

1.90 The site will remain under the ownership of Mauna Kea Limited in perpetuity.

1.91 Mauna Kea Limited will commission suitably qualified and experienced third parties to undertake the necessary monitoring and management at the site for at least 25 years. Should tenure change, Wrexham County Borough Council will be informed of future proposals.

1.92 In the event of corporate takeover, loss of trading and insolvency the mitigation will remain in situ and any future landowners will abide by maintenance proposals outlined in this LEMP. A scheme shall be submitted to the satisfaction of NRW that identifies measures that will enable regulatory bodies, or individuals or bodies authorised by relevant regulatory bodies, to, in the event of lack of or inappropriate surveillance and/or management, carry out any remediation management works and/ or surveillance).

1.93 During the construction process, an ecological compliance audit scheme will be instated. This will involve four visits per year, for each year that construction works are ongoing. This will include defined key performance indicators for the desired condition of the new habitat creation as detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4) and be carried out by an externally appointed body, commissioned by Mauna Kea Limited.

1.94 Following the completion of works, monitoring to ensure that the objectives of the conservation plan are achieved will be undertaken by The Environment Partnership (TEP) under licence for at least 25 years. Site inspection and a review of the management plans would be undertaken once yearly, informed by quarterly meetings with NRW.

1.95 Site liaison and wardening will be undertaken by TEP or an appropriate wildlife body. This body will hold a NRW GCN licence and have experience with GCN mitigation sites.

1.96 Habitat management will be overseen by Mauna Kea Limited and undertaken by an appropriate an landscape management company and consultants with the necessary licences to carry out works in relation to GCN or any other protected species noted at site. In addition to holding an NRW GCN licence, the skills and competencies required for this body will include, but not be limited to:

- Experience with GCN mitigation sites;
- Certificates of competence to undertake landscape management operations on site;
- Knowledge of habitat management techniques detailed within the Habitat Management Plans; and
- Sufficient awareness of new and ongoing biosecurity threats, and the necessary precautions to avoid their spread.

1.97 All GCN surveys will be undertaken by licenced ecologists. If habitats are found to be falling short of their desired conditions, remediation measures will be undertaken, as detailed in the Landscape and Ecological Management Plan (TEP Ref: 10204.004 V4).

Case study

1.98 The mitigation ponds created to the east of the Net World Sports Headquarters on Bryn Lane are currently being monitored by TEP and managed by the landscape management company Ecological Land Management.

1.99 Ecological Land Management are a contractor with an NRW GCN Licence and over 20 years of experience managing nature reserves and habitats, holding contracts with Natural England and other NGOs, including wildlife charity organisations.

1.100 Habitat management is ongoing, though the mitigation ponds have all been colonised by GCN and are considered to be in a good state. Survey data on these ponds is due to be provided to NRW and COFNOD in the form of an update monitoring report in autumn 2025.

REFERENCES

English Nature (2001) Great crested newt mitigation guidelines. English Nature, Peterborough

Langton T, Beckett C & Foster J (2001). Great Crested Newt Conservation Handbook. Froglife, Halesworth, Suffolk.

ANNEXES

Annex 1 - Soft Landscaping Plan (Nicholsons ref: 1059-01-NLD.151 V6).

Annex 2 - Specification for the one-way amphibian fence (TEP ref: D9134.002A).

Annex 3 - Table displaying NRW queries and relevant paragraphs within GCN Conservation Plan

A3 INSET 3

A3 INSET 4

A3 INSET 2

A3 INSET 5

A3 INSET 1

A3 INSET 6

Bryn Lane

Bryn Lane

Access Path from Bryn Lane

Cycle Store

Substation

Operational Waste

Levels consultant to provide detail of interface between new hard standing and existing river culvert

Existing concrete drainage channel

Wildlife Pool Design: Follow ecological consultants detailed guidance on shallow planting shelves, deeper pools and pond margins

33.5m

60m to Driveway on plot to East of site (off Drawing)

22.8m

21m

24.6m

21.8m

14.4m

116m to Northern End of Kelloggs car park (off drawing)

14.4m

24.4m

16.7m

32.2m

20.3m

23.4m

14.9m

15.2m

190m to edge of vegetation within adjecent Kelloggs site (off drawing)

N

0m 10m 20m 30m 40m 50m

1:850

Key

- Proposed Buildings
- Existing Walls & other Structures
- Proposed Road
- Proposed Footpath/cycleway
- Proposed Retaining Wall
- Existing Palisade Fence
- Existing Chainlink Fence
- Existing Post & Rail Fence
- Existing fence inferred loaction
- Proposed Post & Rail Fence
- Existing Retained Tree
- Existing Tree Removed
- Proposed Tree - Light Standard
- Proposed Tree - Standard
- Proposed Log Pile
- Proposed Hibernacula
- Retained Trees & Scrub
- Proposed Native Scrub / Thicket
- Proposed Native Hedgrow
- Proposed Ornamental Hedgrow
- Retained Wild/meadow Grass
- Proposed Wild/meadow Grass
- Proposed Ornamental Planting
- Proposed Aquatic Marginal Grass Mix
- Proposed Aquatic Marginal Planting
- Proposed Wildlife Pool
- Existing Water Channel
- Proposed Slope / Bank / Gradient (1:3)
- Redline Boundary
- Offsite Strategic Ecological Network (Approximate loacation)
- Onsite Ecological Area

28/01/2026	6	Revised Layout and minor planting specification changes
13/01/2026	5 CB	Extent of Ecological Area added to Site Overview
21/05/2025	4 CB	Dims added to Site Overview sheet

Date	Original size	Scale	Drawn by	Checked by	Rev
03/02/2026	A3	1:850	CB	JK	V6

Drawing no: 1059-01-NLD.151 Bryn Lane South

Status: S4

Drawing Title: Soft Landscape Design

Sheet Name: Site Overview

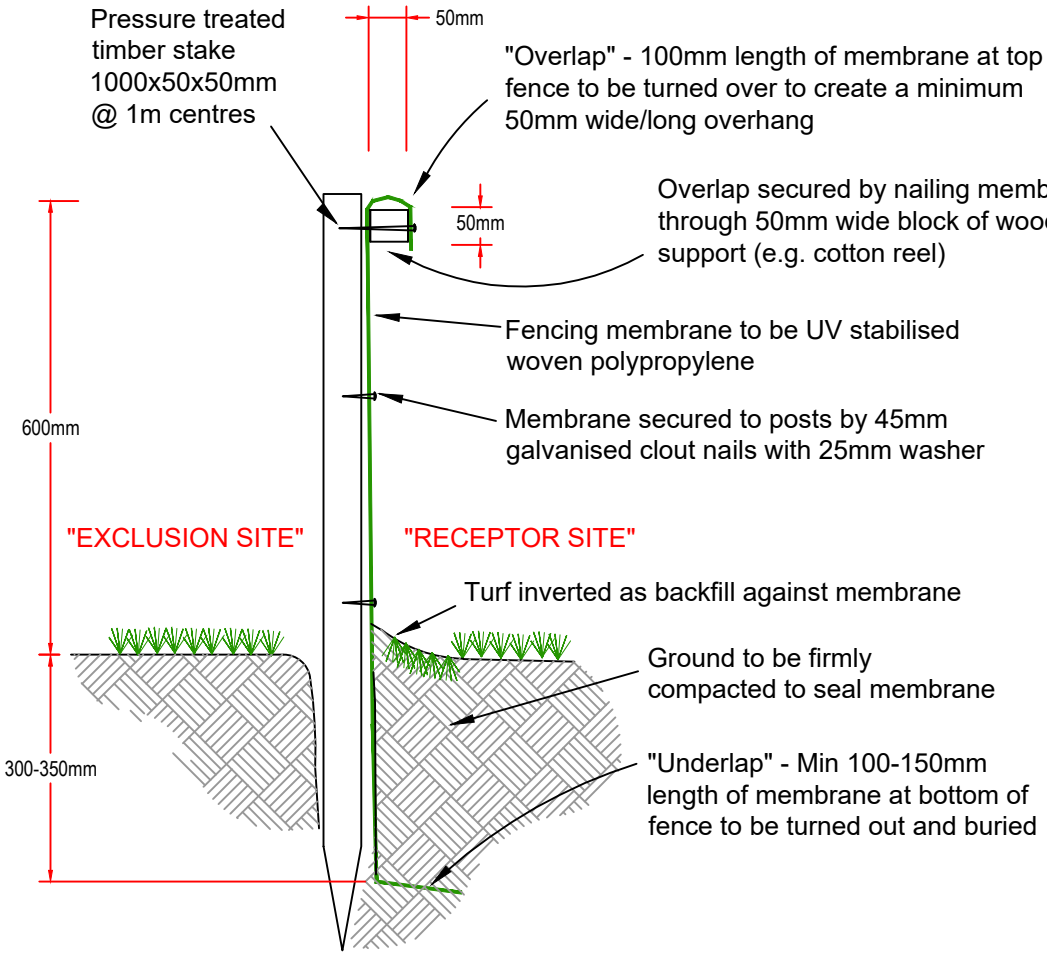
Location: Bryn Lane South, Wrexham

Client name: Net World Sports

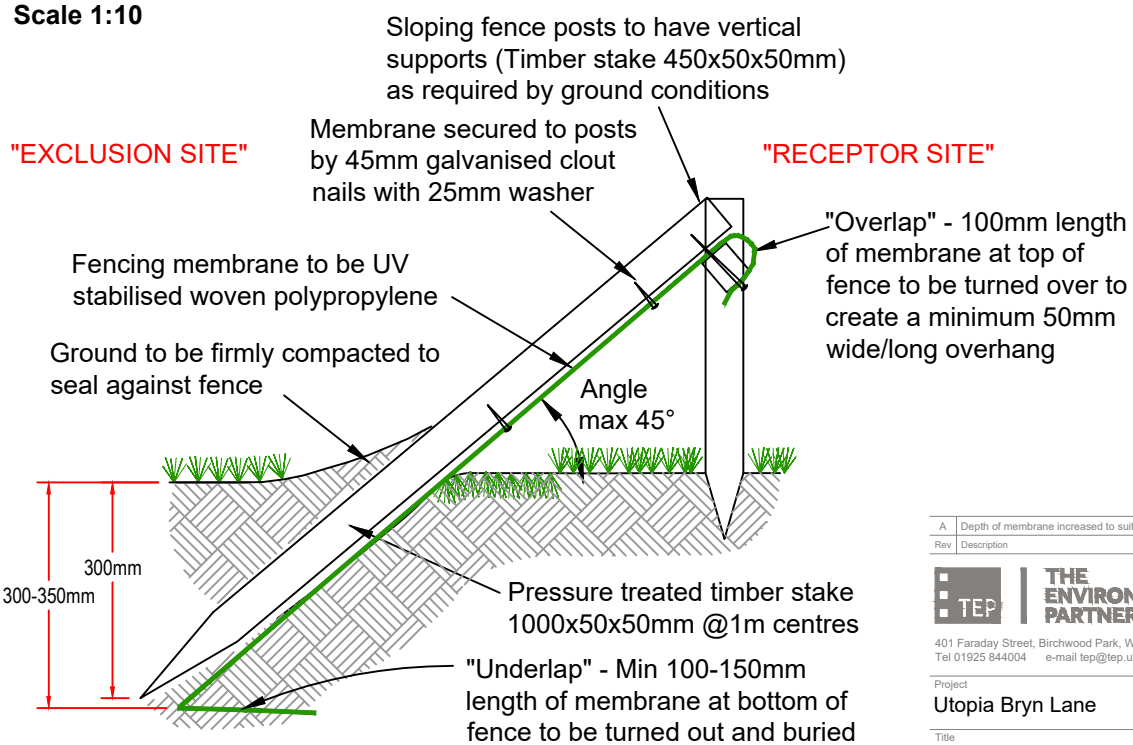
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VERTICAL AMPHIBIAN EXCLUSION FENCING
Scale 1:10



ONE-WAY AMPHIBIAN EXCLUSION FENCING
Scale 1:10



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

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

Project: Utopia Bryn Lane

Title: Temporary Amphibian Fencing

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

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

Information requested by NRW	Relevant paragraph(s) within GCN Conservation Plan
Further details and associated plans concerning GCN avoidance and mitigation measures including: • fence specifications, locations, construction and maintenance (one-way amphibian fence, prior to and throughout the duration of construction operations).	Paragraphs 1.51-1.58
Further details and associated plans concerning GCN avoidance and mitigation measures including: • considerations of access issues.	Paragraph 1.20
Further details and associated plans concerning GCN avoidance and mitigation measures including: • monitoring and maintenance requirements and supervised removal.	Paragraphs 1.54-1.58
The detail of habitat retention, enhancement and creation proposals associated with terrestrial and aquatic habitats. Details to include plans and timescales.	Paragraphs 1.17-1.19 and 1.87-1.88
The submission of a long-term site management plan (not less than 25 years) that includes: • details of habitats and ecological features present or to be created, both in written form and shown on appropriate drawings, including planting plans.	Existing habitats and ecological features: Paragraphs 1.26-1.42 Habitats to be created: Paragraph 1.19 and Paragraphs 1.60-1.63

Information requested by NRW	Relevant paragraph(s) within GCN Conservation Plan
The submission of a long-term site management plan (not less than 25 years) that includes: • defined aims and objectives (including defined key performance indicators for long term monitoring indicators).	Paragraphs 1.60 and 1.85
The submission of a long-term site management plan (not less than 25 years) that includes: • details of monitoring methodologies for habitat(s) and species.	Paragraphs 1.64-1.65 and 1.81-1.84
The submission of a long-term site management plan (not less than 25 years) that includes: • contingency measures if fish or invasive non-native species (INNS) are detected.	Paragraphs 1.73-1.74
The submission of a long-term site management plan (not less than 25 years) that includes: • current and any proposed changes to the freehold tenure of the compensation area (tenure of the ecology and heritage area to be approved by the Local Planning Authority).	Paragraphs 1.89-1.99
The submission of a long-term site management plan (not less than 25 years) that includes: • persons or bodies responsible for undertaking management and surveillance together with required skills and competencies.	Paragraphs 1.64-1.67 and 1.81
The submission of a long-term site management plan (not less than 25 years) that includes: • Details of site wardening.	Paragraph 1.66

Information requested by NRW	Relevant paragraph(s) within GCN Conservation Plan
The submission of a long-term site management plan (not less than 25 years) that includes: • the submitted plan fails to consider licensing and competency requirements regarding management and surveillance aims and objectives are unsatisfactory in respect of great crested newt. Further information should be submitted in respect of species-specific aims and objectives.	Licensing and competency requirements regarding management and surveillance aims: Paragraphs 1.64-1.67 and 1.81 Species-specific aims and objectives: Paragraphs 1.60 and 1.85
The submission of a long-term site management plan (not less than 25 years) that includes: • details of reporting, review and update of the plan (informed by monitoring) at specific intervals as agreed.	Paragraphs 1.65, 1.83-1.84 and 1.86
The submission of detailed measures including plans designed to prevent the accidental capture/killing of GCN during operational phases of the scheme, including the installation and maintenance of an amphibian-friendly surface water management system that does not include gully pots (or other similar features).	Paragraphs 1.20-1.22, 1.51-1.58
Details of timing, phasing and duration of construction activities and conservation measures.	Paragraphs 1.87-1.88
Post-construction monitoring and record dissemination for a period of not less than 25 years. Methodology shall include annual GCN abundance counts and Habitat Suitability Index (HSI) assessments. All ponds to be added to the Wales GCN Monitoring Scheme, with individuals/bodies being identified as being responsible for monitoring and reporting works.	Paragraphs 1.64-1.6 and 1.81-1.84

DRAWINGS

G10204.007A Phase 1 Habitat Survey

G10204.009 Great Crested Newt Fencing Plan



KEY

- Site boundary
- Target note
- Scattered scrub
- Scattered broad-leaved tree
- Standing water
- Native species-rich hedge and trees
- Species-poor hedge and trees
- Fence
- Plantation broad-leaved woodland
- Dense/continuous scrub
- Semi-improved neutral grassland
- Tall ruderal
- Wet ditch
- Bare ground with ephemeral/short perennial
- Introduced shrub
- Building
- Hardstanding

Species Codes

Cm Hawthorn
Fx Ash
Sxc Goat willow

Note:
The locations of habitats and habitat features are indicative.
Off-site habitats displayed with transparency.

Metres
0 20 40 80

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Rev	Description	Drawn	Approved	Date
A	Update to site boundary and habitats	OH	LG	12/11/2024

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Project
Land South of Bryn Lane, Wrexham

Title
Phase 1 Habitat Survey

Drawing Number
G10204.007A

Drawn	Checked	Approved	Scale	Date
OH	SP	KR	1:1,100 @ A3	12/11/2024



KEY

- Site boundary

Amphibian Exclusion

- Carpet tiles
- One way amphibian fence

Phase 1 Habitat Survey

- Target note
- Scattered scrub
- Scattered broad-leaved tree
- Standing water
- Native species-rich hedge and trees
- Species-poor hedge and trees
- Plantation broad-leaved woodland
- Dense/continuous scrub
- Semi-improved neutral grassland
- Tall ruderal
- Wet ditch
- Bare ground with ephemeral/short perennial
- Introduced shrub
- Building
- Hardstanding

Note:
The locations of habitats and habitat features are indicative.

Metres
0 20 40 80

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Site Map



Rev	Description	Drawn	Approved	Date

THE ENVIRONMENT PARTNERSHIP

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Project
Land South of Bryn Lane, Wrexham

Title
Amphibian Exclusion Fence Map

Drawing Number
G10204.009

Drawn	Checked	Approved	Scale	Date
ET	CW	LG	1:1,100 @ A3	30/10/2025

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