Response for Case Officer

Application reference: P/2025/0697

Application/site name: Wrexham Gateway

Ecologist comments:

Overall, I approve of the proposed plans for the site as this will provide an opportunity for improved habitat and well being in the city centre. While I am in support of the project in its concept there are a few specific areas of concern that need to be addressed at this stage, please see specifics below.

Further Information Required:

With respect to bats:

There are inconsistencies between the EIA (Ecological Impact Assessment by Futures Ecology, Report Reference Number FE500/EcIA001, dated July 2025) and bat report (Bat Survey Addendum Report by Futures Ecology, Report Reference Number FE500/BSR01, dated June 2026) regarding the classification of B1 as having either low or moderate bat roost potential. Confirmation from the applicant on this matter is needed in writing to ensure no further bat surveys would be required.

On a similar note, a single tree T1 (T22) was identified as having bat roost potential and not surveyed, this appears to be retained in the proposed plans but confirmation of this is required. This tree was excluded from the above bat report and as such would not be covered if removal was required.

Reason:

101R The building and tree are likely to contain bats, a statutory protected species and it is essential for their roosts to be identified to ensure development does not cause interference.

If planning permission should be granted, the following conditions are required:

With respect to bats:

EC06 – BAT FRIENDLY LIGHTING

No external illumination within the site shall take place before a lighting scheme has been submitted to and agreed in writing by the Local Planning Authority. The lighting

scheme shall be installed and operated in accordance with the approved details. No other lighting shall be used on any external part of the development.

Reason: **103R** To protect bats which would otherwise be damaged/lost by the development hereby permitted.

TL02 – NON-STANDARD TIME CONDITION (BATS)

Any building demolition works hereby permitted shall be commenced before the expiry of 18 months from the date of Bat Survey Addendum Report by Futures Ecology, Report Reference Number FE500/BSR01, dated June 2026. If building demolition works do not commence prior to this date, updated bat survey assessments should be submitted to and approved in writing by the Local Planning Authority before works may continue.

Reason: **103R** To protect bats which would otherwise be damaged/lost by the development hereby permitted.

With respect to NBB:

NET BENEFIT TO BIODIVERSITY PROVISION FOR BATS (full planning)

The development hereby permitted in full shall not be occupied/used until a plan to provide net benefit for biodiversity with a scheme for the accommodation and enhancement of roosting opportunities for bats has been submitted to and approved in writing, by the Local Planning Authority. The measures shall thereafter be maintained for the lifetime of the development.

Reason: **032R** To ensure that the development delivers net benefit to biodiversity in accordance with paragraph 6.4.5 of Planning Policy Wales 12.

EC07 - NET BENEFIT TO BIODIVERSITY 1 (outline planning)

No part of the development granted in outline shall commence until a plan to provide net benefit for biodiversity (NBB) i.e. a better outcome than if the site was left undeveloped has been submitted to, and approved in writing by, the Local Planning Authority. This plan should contain details of location on site and proposed management of suggested NBB features. The measures shall be implemented in full, prior to first occupation / use of the development, and thereafter maintained for the lifetime of the development.

Reason: **032R** To ensure that the development delivers net benefit to biodiversity in accordance with paragraph 6.4.5 of Planning Policy Wales 12.

With respect to birds:

EC05 - SITE CLEARANCE

There shall be no clearance of vegetation on site between the months of March to August inclusively, unless a qualified ecologist has conducted a nesting bird survey within 48 hours prior to the start of works. If active nests are discovered at any point during the scheme of works, no works shall take place within or immediately surrounding the nest until a qualified ecologist confirmed that the young have fledged and the nest is inactive.

Reasons: **121R** In order to protect wildlife interests, which are offered special protection.

Information for the applicant:

With respect to bats:

Bat friendly lighting has been identified in the above-mentioned EIA, the quoted lighting scheme methodology is out of date, and more recent guidance is available within BCT/ILP Guidance Note 08/23.

With respect to GCN, amphibians, reptiles and terrestrial mammals:

We have no further concerns regarding Great Crested Newts, and suggest a point is made to inform the applicant that precautionary working methods detailed in paragraph 6.46 of the Ecological Impact Assessment by Futures Ecology, Report Reference Number FE500/EcIA001, dated July 2025 are adhered to.

These precautionary working methods will also protect any other species listed above during the proposed works.