Futures Ecology Ltd
Carrwood Park
Selby Road
Leeds
LS15 4LG

Our Ref: FE500 / Wrexham Gateway / CC / JSE

Jack Britten
Cushman & Wakefield
London & South East

12th October 2026

[redacted]

Dear Mr Britten,

Wrexham Gateway – ECOLOGY COMMENTS

We are in receipt of comments dated 5th October 2026, made by the local authority pertaining to Wrexham County Borough Council planning application reference P/2025/0697. We have included the comments below for clarity as well as information to address these comments.

"The Ecological Impact Assessment states that 12 trees would be lost (section 6.17) as a result of the proposed development, and that this loss cannot be mitigated (section 6.20). However, the Biodiversity Impact Assessment identifies the loss of 10 urban trees (section 4.5). Clarification is therefore required regarding the correct number of trees proposed for removal.

Confirmation is also required as to whether any of the trees proposed for removal have the potential to support roosting bats. Further justification should be provided as to why the loss of these trees is considered incapable of mitigation, particularly in relation to replacement tree planting and other appropriate ecological mitigation measures."

Tree Losses

Based on the current layout and landscape proposals. we can confirm that there will be a total of **10 individual trees lost** as a result of the proposals. These trees include, as referenced in the associated Ecological Impact Assessment,:

- 3x TG4
- T29
- T30
- T31
- T32
- T33
- T34
- T37

Due to the creation of new habitats being unable to achieve a 10% gain in Area Habitat Units (AHU) and a failure to satisfy trading rules for '*medium distinctiveness habitats'* in previous layout iterations, two additional trees were to be retained within the most recent landscaping plan in order

to achieve the recommended 10% net gain and satisfy trading rules. This current position is reflected in the Biodiversity Impact Assessment (as submitted) but the Ecological Impact Assessment was based on an earlier layout / landscape proposal with two additional tree losses proposed.

Bat Roosting Potential – Trees

We can confirm that there was a single tree, referenced as T1, within the application site boundary which offers bat roosting potential. No other trees within the application site boundary offered any bat roost potential. This tree was discussed in a previous letter (dated 16th September 2026) addressing earlier comments on this application made by the local authority ecologist. T1 is to be retained and buffered within proposed landscape planting as a result of the development proposals. Therefore, **no trees with bat roosting potential are to be lost or impacted** as a result of development.

Mitigation and Compensation

Due to the nature of the proposals and the size of the Site, the trees that could not be retained cannot be mitigated due to their location within the proposed development and associated constraints given the required access to the Site. However, a total of 85 small urban trees are to planted across the development Site, to compensate for the losses in Area Habitat Units (AHU, as detailed within the biodiversity metric tool (as submitted) and to aid in satisfying trading rules for '*medium distinctiveness habitats*'.

The Biodiversity Metric calculation shows a +16.85% net gain in AHU throughout the Site and satisfies trading rules which shows acceptable compensation for the losses of the 10 trees within the Site boundary. The new tree planting across the Site may also provide additional potential foraging and nesting opportunities for a number of local and protected bird species, and offers enhanced commuting pathways throughout the Site for species such as bats.

I trust you will find the above satisfactory, however, if you would like to discuss anything please don't hesitate to contact me.

