Planning application: P/2026/0610

Description: Extension to expand existing pharmaceutical manufacturing space and associated external works

Location: Ipsen Biopharm Ltd, Ash Road North, Wrexham Industrial Estate, Wrexham, LL13 9UF

Ecologist: Léonie Brown

Date: 09/10/2026

Comments in red by Land Studio – 14.10.2026

I have concerns with this application. See comments below for more detail.

Great crested newts

Great crested newts (GCN) are classified as a European Protected Species (EPS) under Schedule 2 of the Conservation of Habitats and Species Regulations 2017. They are also protected under Schedule 5 of the Wildlife and Countryside Act 1981. Wrexham Industrial Estate is known to support a particularly extensive GCN population, and their protection is an imperative consideration for any proposed development within the estate. A Cofnod data search confirmed the presence of GCNs within 500m of the proposed development site. Whilst there is limited suitable terrestrial habitat within the site itself, the area may still be used as a commuting route.

Given the lack of pond features and the limited suitable terrestrial habitat on site, I do not believe that an EPS licence for GCN is required in this case. GCN should be adequately protected by an appropriate set of reasonable avoidance measures (RAMs) which can be secured by a condition. The RAMs provided in Table 3 of the Preliminary Ecological Assessment (PEA) do not adequately ensure the protection of GCN. I suggest that these are modified to include details of a toolbox talk to be given to contractors prior to works, plans to commit to daylight working, and plans to elevate construction material above ground-level.

Table 3 of PEA report 591-LST-XX-XX-RP-E-0001 P03 has been updated to include for the wording provided in Condition 1

Reptiles, amphibians and terrestrial mammals

A Cofnod data search indicated several reptile, amphibian and terrestrial mammal species within 500m of the proposed development site. If condition 1 for GCN is adhered to, these

reasonable avoidance measures should also protect other terrestrial species. Actions such as covering trenches overnight, committing to daylight working, and elevating any construction materials above ground will prevent disturbance to terrestrial wildlife which may be present on site.

Table 3 of PEA report 591-LST-XX-XX-RP-E-0001 P03 has been updated to include for the wording provided in Condition 1

Bats

All bat species in the UK are classified as a European Protected Species under Schedule 2 of the Conservation of Habitats and Species Regulations 2017. As stated in the PEA, the site does not exhibit any potential roosting features for bats given the extensive area of hardstanding, limited vegetation cover, and a relatively young sycamore tree. However, there are Cofnod records of commuting and foraging bats within 500m of the proposed development site. In light of this, a bat-sensitive lighting plan which covers both the construction period and the final extension needs to be submitted for review. I have included a condition for this. As recommended in the PEA, all lighting schemes should be designed in accordance with the latest guidance: ILP Guidance Note 08/23 Bats and Artificial Lighting at Night.

We assume LMA will provide the lighting plan to satisfy Condition 2.

Hedgerow

The proposed development involves the removal of an ornamental hedgerow consisting of predominantly non-native cherry laurel. To compensate for this loss, the Green Infrastructure Statement describes plans to plant a new native hedge. I request further information regarding this hedge. Specifically, its location and extent (which may be indicated on a site plan), its species composition, and how this feature will be established and maintained in the long-term.

Drawing 591-LST-XX-XX-DR-L-0301 Biodiversity Enhancement Plan Rev P01 indicates hedgerow location, composition and extent. Please note that there are many services within this site and therefore the location and extent are such to avoid these existing services.

Whilst I believe that a native hedge would in theory provide more ecological benefit than the current ornamental hedge, more detail is needed to better evaluate this as a compensatory

and Net Biodiversity Benefit (NBB) feature. Once this has been provided, the provision of the replacement hedgerow may be secured by an appropriate condition. General hedgerow guidance which may be useful to the applicant is provided at the end of this document.
Drawing 591-LST-XX-XX-DR-L-0301 Biodiversity Enhancement Plan gives more detail on the hedgerow

Wildflower mix

The Green Infrastructure Statement describes plans to establish a wildflower area within the retained area of grassland verge. I believe that this is an appropriate measure to enhance the ecological benefits of the current green infrastructure on site. However, more detail is needed to better understand how this feature may contribute towards NBB requirements. Details of the specific wildflower mix will need to be submitted for review. I would recommend Emorsgate native wildflower mixes. Given the presence of Environment (Wales) Act 2016 Section 7 butterfly species within 500m of the site, particularly the Dingy Skipper, I would specifically recommend the Emorsgate EM34 Diverse Meadow Mix as it provides the larval food plant (*Lotus corniculatus*). In addition to details of the specific mix, information is needed regarding the specific location, establishment and long-term maintenance of this feature. The Emorsgate website provides tailored management guidance for each specific wildflower mix, which may prove useful if one of their mixes is selected. Once more information has been provided, the establishment and maintenance of wildflower areas may need to be secured by an appropriate condition.

Drawing 591-LST-XX-XX-DR-L-0301 Biodiversity Enhancement Plan Rev P01 gives more detail on the wildflower specification, location and composition.

Birds and bird boxes

All wild birds are legally protected in the UK under the Wildlife and Countryside Act 1981, making it an offence to harm any protected bird, its nest, or its eggs. The ornamental hedgerow on site could support common nesting bird species. As such, vegetation clearance should take place between September and February inclusive or an ECoW should supervise the removal of vegetation. This should be secured by a condition.

The PEA report 591-LST-XX-XX-RP-E-0001 includes this statement in Table 3.

As stated, more information is needed to establish whether the proposed hedgerow and wildflower planting would represent a proportionate demonstration of NBB. The proposal also describes plans to install a single bird box onto a tree within the wider Ipsen Biopharm estate as part of NBB. Ideally, in order to provide on-site NBB, this bird box should be placed within the application site boundary. Whilst there may be technical limitations which make this inappropriate, I would be interested to know if incorporating bird boxes into the new extension would be a possibility? If there is a chance of excessive noise or disturbance, insufficient shelter or other issues associated with installing bird boxes to the structure, I would discourage this idea completely. Bird boxes should ideally face between north and east, be sheltered from wind and rain, provide a clear flight path, and should be constructed from a durable material such as woodcrete. If the provision of bird boxes within the site boundary is deemed possible, details of their specific design and location will need to be submitted for review.

Bird boxes have been removed from the scheme as the structure is not suitable for installation along with the proximity of noise and vehicular traffic within the boundary of this application.

Other NBB options may be more appropriate than a bird box in this case, particularly for on-site measures. I have made a suggestion below, and welcome further discussion regarding additional or alternative NBB features.

Suggestion: bee towers

If bird box installation within the application site boundary is not possible, I encourage the consideration of bee towers as an alternative NBB provision. These freestanding towers can provide nesting sites for solitary bees. A well-designed example is the Green&Blue Beepost model. I believe that the installation of at least one of these towers would compliment the new wildflower area and may provide a more meaningful demonstration of NBB for this specific application. These towers do not take up much space, so may be ideal for an application such as this where the available space to achieve NBB on site is limited. I invite the applicant to give their thoughts on this idea and emphasise that this is a recommendation rather than a set requirement.

A bee tower has been included for instead of bird boxes. The specification and location is indicated on drawing 591-LST-XX-XX-DR-L-0301 Biodiversity Enhancement Plan Rev P03

Whilst my comments above specify areas for which more information is required, I summarise them below for clarity.

- More information is needed regarding the new native hedgerow. This should include details of its exact location and extent, the species composition, and how the feature will be established and maintained in the long-term. As stated previously, I have provided general hedgerow guidance at the end of this document.
  Drawing 591-LST-XX-XX-DR-L-0301 Biodiversity Enhancement Plan will cover this
- More information is needed regarding the new wildflower verge. This should include details of the species mix and how this feature will be established and maintained in the long-term.
  Drawing 591-LST-XX-XX-DR-L-0301 Biodiversity Enhancement Plan will cover this
- More information is needed regarding the installation of at least one bird box, particularly whether it would be possible and appropriate to install these within the new extension. If not, I welcome the applicant's thoughts on the installation of at least one bee tower as an alternative (a recommendation rather than a requirement).
  Drawing 591-LST-XX-XX-DR-L-0301 Biodiversity Enhancement Plan will include bee tower instead of bird box

Should permission be granted, I suggest that the following conditions are included.

Condition 1: GCN Reasonable Avoidance Measures

No development or phase of development, including site clearance, shall commence until a Great Crested Newt (GCN) plan of reasonable avoidance measures has been submitted to and approved in writing by the Local Planning Authority. The plan of reasonable avoidance measures should include, but not necessarily be limited to:

- Proposals for the clearance of individuals from working areas
- Any trenches or holes should be covered to prevent entrapment.
- Details of timing, phasing and delivery of reasonable avoidance measures
- Details of a toolbox talk for contractors regarding GCN identification and its protected status
- Plans to commit to daylight working to avoid the GCN active period
- Plans to elevate construction materials above ground-level and to avoid storing materials close to boundary vegetation

- If GCN are found on site during works, all works should stop and NRW contacted for further advice

The plan of reasonable avoidance measures shall be carried out in accordance with the approved details.

Reason: To ensure that GCN are protected by the development.

Condition 2: Lighting Plan

Prior to installation a Lighting Plan has been submitted to and approved in writing by the Local Planning Authority. This Lighting Plan shall consider existing and proposed lighting together with any spillage originating from internal light sources including:

- Details of lighting to be used during and post construction
- Plans illustrating the location and type of lighting
- Plans illustrating projected or retained bat emergence points; together with retained or proposed features planned to be functionally used by bats for foraging/dispersal purposes
- Provisions of the scheme shall accord with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/23: Bats and Artificial Lighting at Night.

The Lighting Plan shall be carried out in accordance with the approved details.

Justification: To ensure that bats are protected by the development.

Condition 3: Nesting Birds

No vegetation removal on site shall take place between 1st March and 31st August inclusive, unless a qualified ecologist has conducted a nesting bird survey within 48 hours prior to the start of works. If active nests are discovered, no vegetation removal shall take place until a qualified ecologist confirms that the young have fledged and the nest is inactive.

Justification: To protect nesting birds.

General Hedgerow Guidance

Notes added onto drawing 591-LST-XX-XX-DR-L-0301

Species selection

- Minimum of five species
- Blackthorn (*Prunus spinose*) and Hawthorn (*Crataegus monogyna*) should make up 80-85% of the species mix. These should be integrated with any three from:

    - Hazel (*Corylus avellana*) and/or field maple (*Acer campestre*) – 5-15% of the mix.
    - Holly (*Ilex aquifolium*), field rose (*Rosa arvensis*), gooseberry (*Ribes uva-crispa*), bird cherry (*Prunus padus*) and dog rose (*Rosa canina*) – 1-5% of the mix.

Preparation

- The optimal season for planting is between October and March, although after mid-November is ideal.
- Ensure that ground is not frozen or flooded.
- Create a 1m wide weed-free strip.

Planting

- Plants should be supplied in accordance with the Horticultural Trade Association's National Plant specification and be sourced from a nursery that is a Member of the Horticultural Trades Association Nursery Certification Scheme.
- Plant in trenches large enough to take the full spread of roots (20cm depth x 40cm width). Back fill with a previously prepared mixture of topsoil excavated from the pit, together with suitable compost and additional topsoil as required.
- Plant in a double staggered row approximately 30cm apart, 6 plants per metre.
- The base of the hedge should be mulched with a 50-75mm layer of composted bark to stop weed growth and retain moisture in the soil.
- Where necessary, protect plants from damage and grazing by using protective tubes or spiral guards.

Maintenance

- Water the hedge for the first summer or any dry period in the first 12 months.
- Maintain weed control for at least two seasons.
- Replace any stock that dies within the first year.
- To encourage wildlife, trim the hedgerow no more than every second year. This allows the shrubs and trees to produce more flowers, nuts and berries.
- Never trim the hedgerow between the beginning of March and the end of August when it would be harmful to invertebrates and nesting birds. The ideal time to trim the hedgerow is between January and February.