Planning application: P/2026/0488

Description: Erection of a multi-storey car park and associated access

Location: Building 7, Ipsen Biopharm Ltd, Ash Road North, Wrexham Industrial Estate, Wrexham, LL13 9UF

Ecologist: Léonie Brown

Date: 07/10/2026

LMA/Land Studio Response In Red

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

Great crested newts

Great crested newts (GCNs) are classified as a European Protected Species 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. Specifically, the proximity of a known GCN pond within the nearby Erlas Black Wood raises concerns regarding GCN presence on site during works.

A response from NRW (NRW Consultation Response by Callum Whitehead, dated 24 August 2026) indicated that the current submission does not demonstrate that GCN populations will be maintained at a favourable conservation status. I agree with NRW that the current reasonable avoidance measures (RAMs) described in Table 3 of the Preliminary Ecological Assessment (Preliminary Ecological Assessment and NBB by Melissa Finch, dated June 2026) do not go far enough in protecting GCN during works. Conditions 1 and 2 suggested by NRW seem appropriate in this case, and I suggest that they are included in any decision regarding this application. I would also suggest that condition 1 includes a requirement for a toolbox talk to be given to contractors prior to works commencing. I recommend that works are only conducted during daylight hours to avoid the GCN active period. Another integral avoidance measure would be the storage of construction materials above ground to prevent GCN from becoming trapped or injured. I do not consider an NRW species licence necessary in this case.

Table 3 of the PEA report 498-LST-XX-XX-RP-0002 Rev 04 has been updated to include for additional measures indicated in Condition 1 and above.

NRW highlights the need for additional information regarding an amphibian-friendly water management system as part of the proposed drainage strategy, specifically the exclusion of gully pots and similar features. I agree with this, as there would be the potential for GCNs and other amphibians to become trapped inside these structures.

The surface water drainage strategy utilises raingardens with flush kerbs for drainage of access roads which removes the need for gully pots. Levels in the vicinity of the new access connection to the Ash Road South do however mean that a road gully is required as raingardens are not suitable in this location. The junction design is currently being reviewed as part of a S184 application with the local highway authority.

Amphibians, reptiles 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.

The PEA already includes a statement which covers this.

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. The PEA submitted as part of this application noted the lack of potential roosting features within the existing site. It also noted the presence of foraging and commuting bats across the site, which is supported by Cofnod bat records. The lack of buildings currently on the site, as well as the nature of the surrounding vegetation, mean that no roosting areas are likely to be affected by the proposed works. No further bat surveys are required.

As per NRW's response, I agree that a lighting plan needs to be submitted as part of this application. The PEA states that the lighting scheme will be designed in accordance with the appropriate guidance, but details and plans are needed to assess any impacts on bats from

the proposed development. NRW provides a condition with respect to this issue, which I suggest is included as part of any decisions made for this application. The lighting plan should include details of lighting used during construction and as part of the final multi-storey car park (MSCP), and, as recommended in the PEA, should follow the latest guidance: Guidance Note 08/23 Bats and Artificial Lighting at Night.

A lighting plan will be provided by LMA to satisfy this comment and the updated PEA has made reference to this requirement. We are comfortable with proposed condition 3.

Whilst the PEA states that works will avoid night-time activity to reduce the need for artificial lighting, details of how any artificial lighting will consider bat requirements is necessary. For example, details of light warmth, direction and how light is activated (motion sensor etc) are required.

This will be included for on the lighting plan which will be submitted in response to condition 3

Both the PEA and Green Infrastructure Statement (Green Infrastructure Statement, latest revision dated 18 June 2026) mention bat boxes. No specific plans regarding the provision of bat boxes have been supplied as part of this application. The applicant needs to confirm if bat boxes will be provided as part of the development. If they are, then details of their location, orientation, structure/brand and height above ground will need to be provided. This should ideally be included on a site plan.

A biodiversity enhancement plan 498-LST-XX-XX-DR-L-302 has now been provided which indicates the location and specification of the bat boxes. These are indicated outside of the redline boundary but within Ipsen land ownership as the façade of the proposed multistorey car park is not suitable for the hanging of bat boxes and there are no existing or proposed trees within the redline. These mature trees are close to site and believed to be the preferred location for these close to the site.

Erlas Wood is currently leased to the Wildlife Trust from Village Bakery and is managed as part of a mitigation site if additional mitigation is not allowed within Ipsen's wider site boundary it may be possible to offer if the ecologist would permit bird and bat boxes being fitted within Erla's Wood or on mature trees just outside of the site.

Wildflower meadow mix

The Landscape Plan outlines an area of proposed wildflower meadow to the east of the proposed MSCP. It states that this will be a 257m^2 area of Emorsgate EM3 Special General Purpose Meadow Mixture. A Cofnod data search indicated records of three butterfly species listed in Section 7 of the Environment (Wales) Act 2016 within 500m of the proposed development site. As part of the Section 7 designation, the LPA must have regard to these species when seeking to maintain and enhance biodiversity. The Cofnod search indicated a particularly strong presence of Dingy Skipper butterflies around the site in the last 10 years. In light of this, I would strongly suggest that a different wildflower mix is used for the proposed wildflower meadow area. The Emorsgate EM34 Diverse Meadow Mixture would provide a more targeted benefit for the Dingy Skipper because it includes *Lotus corniculatus*, which is the larval food plant of this species. Switching to this specific mix would represent a more targeted approach for enhancing local biodiversity and would contribute towards a stronger demonstration of Net Biodiversity Benefit (NBB).

The Landscape GA plan 498-LST-XX-XX-DR-L-0101 Rev P02 includes for the revised meadow mix.

Aside from the specific mix used, more information is needed regarding how this wildflower area will be established and maintained year-on-year. The Emorsgate website provides details as to how each mix needs to be managed. Any management plans for this wildflower area should be submitted for review.

Landscape management has been included for within the Landscape and Ecology Management Plan document 498-LST-XX-XX-RP-L-0002

Raingarden

The Landscape Plan illustrates the location of a proposed raingarden around the perimeter of the MSCP, as well as details of the species mix. The drainage strategy describes how surface water will be collected by downpipes which will flow into these structured raingardens. It also outlines plans for the maintenance of this feature, including the removal of litter and debris, mulch replacement and quarterly inspections. These measures are appropriate for the long-term maintenance of this feature.

Whilst I support the inclusion of this feature as part of the proposed MSCP, it would ideally include a greater proportion of native plant species. Out of eleven suggested species, only three of these are native to the UK. Aside from perhaps aesthetic qualities of non-native ornamentals, native plant species are often better adapted to local rainfall patterns, directly support local wildlife and often require less maintenance. Native species for use in a raingarden include but are not limited to purple moor grass, bird's foot trefoil, lavender, red campion, marsh marigold and lady fern. I recommend that the applicant considers altering the rain garden species mix to a more native composition to better support local biodiversity. I would request more information as to whether they would be willing to switch to a more native mix, else a justification for their choice of ornamental species for this drainage feature. As with the wildflower meadow, altering the species composition to a more appropriate mix would better demonstrate proportionate and relevant NBB measures.

The Landscape Softworks Plan 498-LST-XX-XX-DR-L-0301 Rev P01 includes for the revised mix of planting within the raingardens.

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 PEA recognises the various bird species found within 2km of the site. Habitats within the immediate vicinity of the site, including Erlas Wood, have the potential to support nesting bird species. The PEA recognises that whilst no further bird surveys are needed, vegetation clearance should take place between September and February inclusive or an ECoW should supervise the removal of vegetation. This is an appropriate measure and should be secured by a condition.

The proposed development plans to incorporate two bird boxes as part of the western elevation of the MSCP. The RSPB states that bird boxes should ideally face between north and east. There may be structural limitations for positioning bird boxes along the northern and eastern elevations of the MSCP which I am unaware of, but I would suggest an adjustment to the current proposed locations of the boxes. When determining their locations, keep in mind that bird boxes should ensure a clear flight path to the entrance, should avoid direct sunlight (south facing), and should be sheltered from strong winds and rain.

A biodiversity enhancement plan 498-LST-XX-XX-DR-L-302 has been provided which indicates the location and specification of the bird boxes. These are now indicated outside of the redline boundary but within Ipsen land ownership as the façade of the proposed multistorey car park is not suitable for the hanging of bird boxes on any elevation.

There are no existing or proposed trees within the redline therefore our option for mature trees nearby. These mature trees are close to site and believed to be the preferred location for bird boxes. Erlas Wood is currently leased to the Wildlife Trust from Village Bakery and is managed as part of a mitigation site if additional mitigation is not allowed within Ipsen's wider site boundary it may be possible to offer if the ecologist would permit bird boxes being fitted within Erla's Wood or on mature trees just outside of the site.

Given the scale of the MSCP, I would enquire as to whether the applicant would be open to incorporating more bird boxes into the structure. Whilst placing boxes along the southern elevation is discouraged, incorporating more boxes to the northern and eastern elevations would be beneficial. As I have stated, there may be structural limitations which make this impossible, but I believe there could be an opportunity here to enhance bird nesting opportunities even further. This would once again contribute to a more robust NBB demonstration.

As above in regards to façade. We have not included more bird boxes due to the availability of suitable trees.

I request that details of the specific type of bird box are submitted for review. Cofnod indicates records of swifts, starlings, house sparrows and house martins in the local area. Selecting boxes which may accommodate these species would be ideal. Additionally, bird boxes should be constructed from a durable material such as woodcrete to ensure long-term benefits for local birds.

A biodiversity enhancement plan 498-LST-XX-XX-DR-L-302 has been provided which indicates the location and specification of the bird boxes.

Erlas Wood boundary fencing

As per the Proposed Site Plan, there are plans to install a new fence along the eastern boundary of the development site. This fence will border the Erlas Black Wood which is a designated Wildlife Site for Wrexham. The wood is currently leased to the Wildlife Trust from Village Bakery and is managed as part of a mitigation site. More information is required as to how the erection and existence of this fence will avoid damage to the boundary of this woodland. If deemed necessary, a condition may be required to prevent damage to the woodland area which could arise as a direct result of this new fence.

The site boundary fence is not being replaced as part of this project with in the redline boundary not reaching the site boundary with Erlas Wood.

Vegetation survey

The PEA survey was conducted in February 2026. This is outside of the appropriate survey season for vegetation, meaning that some vegetative species may have been overlooked. Given the scale of vegetation removal as part of this development, requesting an updated vegetation survey during the appropriate season does not seem necessary in this case. Instead, I suggest that a suitably qualified ecologist inspects the area for protected plant species prior to vegetation clearance and oversees the clearance process. This can be secured by a condition. There are records of bee orchids in the locality, so the ecologist should ensure that these are not present in the area to be cleared.

Table 3 of the PEA report 498-LST-XX-XX-RP-0002 Rev 04 already includes this as a requirement.

River Dee and Bala Lake SAC

Whilst the proposed development site is within the catchment of the River Dee and Bala Lake SAC, I agree with NRW in that the proposal in unlikely to have a significant effect on the SAC from nutrient inputs.

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

- As suggested by NRW, more information is needed regarding an amphibian-friendly surface water management system which should exclude gully pots and similar features.
  The drainage drawing 498-LST-XX-XX-DR-D-0100 issued for planning does not include any road gullies apart from at the junction with the highway where the new access is being constructed. The updated detailed drainage drawings will be reviewed and approved by SAB and Highways as part of the S184 and could be issued to NRW once complete to alleviate any concerns.
- Confirmation is needed as to whether the proposed development will involve the erection of bat boxes. If so, detail is needed regarding their location, orientation, height and material.
  Refer to drawing 498- LST-XX-XX-DR-L-0302 Rev P01.

- Confirmation is needed as to which wildflower meadow mix will be used, as per my suggestion that the species mix is altered. Information is also needed regarding the establishment and year-on-year maintenance of this feature.
  Refer to drawing 498- LST-XX-XX-DR-L-0301 Rev P01.
- Confirmation is needed as to the species composition of the proposed raingarden, as per my suggestion that the species mix is altered.
  Refer to drawing 498- LST-XX-XX-DR-L-0301 Rev P01.
- Detail is needed regarding the location and specification of the proposed bird boxes. I have requested that the applicant considers the installation of additional bird boxes within the MSCP. I would appreciate their thoughts on this.
  Refer to drawing 498- LST-XX-XX-DR-L-0302 Rev P01.
- More information is required as to how the erection and existence of the new boundary fence will avoid damage to the boundary of Erlas Black Wood. Once this has been provided, any measures may need to be secured by a condition.
  Not required as this is not being amended in this application. The note" "Proposed fence" was included on the site layout drawing in error. The fence is outside the red line of this application.

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

Condition 1: GCN Reasonable Avoidance Measures (modified from NRW)

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:

- Fence design, construction and maintenance (the erection of a one-way amphibian fence, prior to and throughout the duration of construction operations)
- Proposals for the clearance of individuals from working areas
- 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: Biosecurity Risk Assessment (NRW)

No development, including site clearance, shall commence until a Biosecurity Risk Assessment, and Method Statement that considers invasive non-native species and specific diseases (e.g. Chytrid) has been submitted to and approved in writing by the Local Planning Authority. The risk assessment should include:

- The identification of any Invasive Non-native Species (INNS), or certain diseases present within or in the environs of the application site;
- Confirmation of measures to eradicate control identified INNS or listed diseases present within or in the environs of the application site; and
- Measures or actions that aim to prevent INNS/identified diseases colonizing including introduction to the site for the duration of construction of the scheme.

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

Condition 3: Lighting Plan (NRW)

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 4: 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.

Condition 5: Vegetation Clearance
There shall be no clearance of vegetation on site without prior inspection by a qualified ecologist. A qualified ecologist should oversee vegetation clearance.
Justification: To prevent the clearance of protected botanical species.