[redacted]

[redacted]

Subject: RE: Planning application P/2026/0085 - Land west of Tudor Drive, Penley, Wrexham

Hi [redacted]

Referring to application P/2026/0085, our conclusion is that there has been very little change from the initial review request. We do not believe the retrospective planning permission should be granted. Following a review of the information to date, our queries are set out below.

Referring to the Ecological Appraisal Report dated 21st July 2026.

- Page 8 – We question why a Cofnod search was not carried out?
- Page 9 – We question why eDNA analysis was not undertaken? Presence / absence should be carried out on all ponds as it is known that HSI is a poor indicator of suitability and there are multiple examples of GCN in ponds with a poor or below average potential to support GCN according to the HSI.
- Page 10 – Are all surveyors accredited agents on Mick Smith's licence? Section 3.5.3 states that all surveys were overseen by Mick Smith – Is this not the case? We also question why a Natural England licenced ecologist (Chris Gosset) was used in Wales? Surely works undertaken here would be outside of the boundary if their licence?
- Page 11 – There is no mention of the surveyor and their level of competence – BCT level 2 (CIEEM 'Capbable') for the Ground Level Tree Assessment (GLTA) assumes NRW bat survey licence, and BCT Level 3 (CIEEM 'Accomplished') for the interpretation of the results.
- Page 11 – Section 3.7.3 – What is the Zone of Influence used for the trees? It seems all trees surveyed were very close to the created open work area. The buffer seems very small for potentially disturbing operations.
- Page 21 – There is no confirmation through aerial surveys of the extent of many of the potential roost features – the use of the word 'appears' is not definitive. Additionally, the sub-optimal time of year also raises doubts as to the validity of the survey and their level of importance assigned to the trees.
- Page 26 – Section 4.3.8.1 – We appear to be missing a plan showing the locations of the Japanese knotweed. What is the current land use at this site and what are the risks of transporting contaminated material from the site?
- Page 27 – Section 4.5.3 – We don't agree with this contradicting information. The author states the site would have resembled the closed tree canopy and dense ground vegetation cover of the wide woodland sited on the hospital footprint, which are unsuitable habitats for reptiles to bask or forage.

However, Figure 3 shows open areas in 2018 that are very suitable for basking. Furthermore, there is good connecting habitat through the site and into the wider environment to all directions apart from the housing development to the east.

- Page 29 – Section 5.1 – Is the site open to the public?
- Page 31 – Section 5.5.1 – We disagree, the level of disturbance at the site is wholly a result of an unauthorised practice and therefore the baseline level is no disturbance from arb machinery, as opposed to the current level of disturbance. The activities to date have had the potential to disturb bats. The ZOI for the GLTA is far too small with no trees beyond the few meters surrounding the work area having been surveyed.
- Page 31 – Section 5.9 – I'm not sure how the ecologist can definitively say that the site had limited floristic value, which raises further concerns.
- Page 32 – Section 5.10 – This is outdated thinking. There are large amounts of evidence through the Bat Tree Habitat Key regarding roost provision in small trees, especially in sycamore which is common on site.
- Page 31 – Section 5.11 - Glades are important but are boosted by the understory and underlying soil / humic layer supporting the inverts which in this instance has been removed through the unauthorised development which has not allowed the reestablishment of the edge flora community.
- Page 33 - 5.12 – Statement in 5.10 contradicts this – as it states that "areas of dense scrub and thicket that would provide suitable nesting habitats for birds as well as large areas of leaf litter that would have provided habitat for amphibians, hedgehog and a wide range of invertebrates". There is no mention of the creation of suitable refugia through the stacking of timber which would not be an issue had the unauthorised development not taken place
- Page 33 – Section 5.13 – There are unsubstantiated claims throughout this section – see comment above regarding evidence of PRF-M in small diameter sycamore (David Harries can reference this evidence) as well as extensively in the BTHK (Henry Andrews).
- Page 36 – Section 6.5.2.2 – It was mentioned that the site has no power supply – is the site currently lit? How is it currently lit? Has this been assessed for its impact on nocturnal wildlife?
- Page 36 – Section 6.5.2.4 – what are the specific RPA protection measures that are proposed?
- Page 40 – Section 6.5.6.1 – Is this practical for a arb / firewood business – in essence, every time a log pile is added to or removed from during the nesting season, a pre-start check for birds will need to be carried out by an ecologist.
- Page 41 – Section 6.5.7 – There are contradicting bat box numbers – please confirm the actual number and type proposed. Additionally, there are no location plans of the proposed mitigation and enhancement boxes – this needs to be shown on a plan.

If you need anything further on, then please get in touch.

Kind regards,

[redacted]

[redacted]

Subject: RE: Planning application P/2026/0085 - Land west of Tudor Drive, Penley, Wrexham

Hi [redacted]

After a further search, I have just found the email from [redacted] on the file so no need to send that response over.

I have attached the information that was provided to us on 31st July; if you or [redacted] could please send a final response that would be really helpful. Working on the assumption that the proposal still cannot be supported, I will then be in position to refuse the application.

Regards

[redacted]

[redacted]

Subject: RE: Planning application P/2026/0085 - Land west of Tudor Drive, Penley, Wrexham

Good morning [redacted]

I don't believe we have seen an ecology report. My colleague [redacted] sent the latest response following a review of the Cofnod data and tree officer comments. We were also sent the GIS and NBB. Happy to forward those emails on to you if that helps?

With regards to the ecology report, is there one on file you would like me to review?

Many thanks,

[redacted]

YGC

[redacted]

[redacted]

Subject: Planning application P/2026/0085 - Land west of Tudor Drive, Penley, Wrexham

Hi [redacted]

Sorry to bother you. I've recently been asked to take over as case officer for planning application P/2026/0085.

I can see that you provided a consultation response for this application back in March. An ecology report was provided in July in response to your objections; please can you tell me if this was forwarded to you for comments by previous officers [redacted]

Thanks

Sarah.

[redacted]

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

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We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

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