Planning Application: P/2026/0487

Description: Formation of landscaped and pedestrianised area with associated works

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

Ecologist: Sarah Brattel

Date: 7/10/2026

Land Studio and LMA Comments in Red – 22.10.2026

While I appreciate the amenity and practical benefits of the proposed pedestrian and landscaped area and believe there is the potential for the site to provide benefit for local biodiversity, further information is required.

Bats

All UK bat species are protected under European Protected Species (Schedule 2) of the Conservation of Habitats and Species Regulations 2017. I concur with the PEA that the site lacks suitable roosting features, and therefore no further bat surveys are required.

The PEA highlights the presence of suitable foraging and commuting habitat across the site; this is supported by Cofnod bat records within the nearby area. A recommendation was given within the PEA to protect foraging and commuting habitat with a sympathetic lighting strategy no such details have been provided. The lighting plan should include details of the lighting used during both the construction phase and final installation (such as the bollard lights) to assess any impacts on bats from the proposed development. As suggested within the PEA, this should follow the latest guidance: Guidance Note 08/23 bats and Artificial Lighting at Night. For example, downward facing lights, limiting excess light (motion sensors) and restricting illumination to a certain spectrum range (light warmth).

No provision for bat boxes is included within this proposal, these could provide an additional enhancement. However, other enhancements would provide more appropriate on-site biodiversity benefit, therefore bat boxes would be an additional feature rather than a requirement to meet NBB targets.

Land Studio will be producing a permanent lighting scheme drawing and lighting specification for Ipsen to review and this will then be submitted in response to any planning condition imposed. The construction phase lighting will similarly be provided once a contractor is appointed element however cannot be undertaken at this time. Thes proposals will be fully compliant with the latest guidance as described above.

Bat boxes have not been allowed for (refer to statement later on under bats) but a deadwood hibernacula has been provided. This is indicated on drawing 498-LST-XX-XX-DR-L-1301.

Great crested newts

Great crested newts (GCN) are protected under both the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. The Wrexham Industrial Estate is known to house an extensive pond network and important population of GCN. As such their protection is of vital importance and an imperative planning consideration.

While there is no suitable waterbody on site to support a breeding population of GCN there remains suitable habitat adjacent to and bordering the site boundary that might provide some commuting and foraging value to GCN. This in context of a known breeding population within Erlas Wood located ~ 200 meters east means that there remains the slight possibility of GCN commuting through the site. As such GCN remain a planning concern for this application. I concur with NRW that with the inclusion of a suitably worded suite of reasonable avoidance measures any potential impact to GCN can be mitigated. While the PEA mentioned precautionary measures these should be built upon further as such a suitable planning condition has been suggested below.

Table 3 of the PEA report 498-LST-XX-XX-RP-0003 P03 has been updated to include for additional measures

Amphibians, reptiles and terrestrial mammals

Multiple species of amphibians, terrestrial mammals and reptiles are known to be located within Wrexham Industrial Estate and were identified within 500m of the site during a Cofnod search. I am satisfied that suitably worded reasonable avoidance measures would mitigate potential impacts to these species. Actions such as covering excavations and pipes, working within daylight hours and raising construction materials off the ground should be built into the condition to prevent any potential harm.

Table 3 of the PEA report 498-LST-XX-XX-RP-0003 P03 includes for the measures identified above.

Wildflower planting

Wrexham Industrial Estate provides key habitat for various invertebrate species and is within the Welsh bee corridor. A Cofnod data search highlights records of Dingy Skipper, Grizzled Skipper and Small heath within 250m of the site, these are all Section 7 Species of Principle Importance under the Environmental Act (Wales) 2016. In light of this, a stronger demonstration of NBB would be provided by ensuring wildflower planting contains a combination of vital larvae food plants of these species. These

efforts would then contribute to habitat connectivity within the wider industrial estate. A combination of the following species would provide a targeted response;

- Common Bird's-foot-trefoil (*Lotus corniculatus*)
- Agrimony (*Agrimonia eupatoria*)
- Creeping Cinquefoil (*Potentilla reptans*)
- Wild Strawberry (*Fragaria vesca*)
- Barren Strawberry (*P. sterilis*)
- Tormentil (*P. erecta*) and
- Salad Burnet (*Sanguisorba minor*)

Seed mixes and plug plants should be native and from trusted and reputable suppliers considering suitability of the site and soil conditions. Suppliers such as Emorsgate seeds or Landlife Wildflowers should be considered. Appropriate advice on best ground preparation instructions should be taken, such as those given on the RHS Gardening website. Suggestions for ongoing management of various seed mixes can be found on websites such as Emorsgate.

I request further information regarding this proposed habitat. Specifically, details of seed mix composition, and how this feature will be established and maintained to ensure its success. Once this has been provided, a suitably worded condition with relation to site NBB can be created.

The Landscape GA plan 498-LST-XX-XX-DR-L-1101 Rev P01 includes for seed mix Emorsgate EM7F and additional plug planting for the species indicated above.

The LEMP report 498-LST-XX-XX-RP-L-1001 now provided Includes for the maintenance requirements.

<u>Tree planting</u>

Tree planting within the pedestrian area will provide amenity value as well as having the potential to benefit biodiversity. Further details, specifically of species composition, and how the trees will be established and maintained are needed to provide a clearer picture of the central area of the site. Note should be made of how these trees are to be incorporated into the decking area.

The seating area could be further enhanced with the incorporation of complementary native species planting either surround tree areas or within raised planters. While I believe these would complement plans well it is merely a suggestion and not a requirement for the proposal to meet NBB.

We have provided drawing 498-LST-XX-XX-DR-L-1301 in partial response to the above. Further details around the central part of the site area around the seating areas will be provided at the next stage of the design following planning approval so we would

respectfully request that the provision of these details be conditioned. Planting that has been provided does include native species.

Birds and Bird boxes

The PEA identified an area of scrub, dominated by bramble along the southeastern boundary of the site, this would provide some limited suitable habitat for nesting birds, therefore they remain a planning consideration. 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. While the site provides some habitat for nesting birds it is restricted to a small area of boundary scrub and immature trees, as such no further bird survey work is required. If clearance of this vegetation is necessary then it should occur outside nesting bird season or under the guidance of an ecologist, a suitable condition is included below.

The PEA report 498-LST-XX-XX-RP-0003 P03 includes for the measures identified above.

The PEA recommends the installation of a single bird box within the land owned by Ipsen as a suitable biodiversity enhancement. While this could potentially improve nesting habitat in the area, there is no suitable onsite tree or building for such a feature to be installed. Therefore, further details as to its location and type would be required to determine its suitability as an enhancement feature.

Other NBB measures may provide more appropriate options than a bird box in this case, particularly to ensure onsite NBB. I have provided a suggestion below but would welcome further discussion to determine the best NBB solution in relation to the surrounding Ipsen sites.

The PEA has been amended to remove bird boxes from the scheme. A deadwood hibernacula and insect hotel has been included for. The location of this is included on the Biodiversity enhancement plan 498-LST-XX-XX-DR-L-01301.

Suggestion: Insect hotels and/or deadwood refugia

The proposed development includes areas of wildflower planting which will be beneficial to invertebrates within the area. I would suggest that providing further infrastructure for invertebrates such as an insect hotel or deadwood refugia could provide more suitable onsite biodiversity enhancements. Refugia could be slotted into shade along the eastern boundary to further incorporate the area surrounding the offsite drainage ditch. Whereas insect hotels could be incorporated into the wider wildflower planting to the west in a sheltered area facing south/southeast. These features would allow proposed enhancements to provide a more complete sanctuary area for native pollinators and beneficial wildlife.

A deadwood hibernacula and insect hotel have been included for. The location of this is included on the Biodiversity enhancement plan 498-LST-XX-XX-DR-L-01301.

River Dee and Bala Lake SAC

I agree with NRW that although the proposed development site falls within the River Dee and Bala Lake SAC catchment, there is unlikely to be a significant effect from the proposal on nutrient inputs into the SAC.

Should permission be granted, the following conditions should be included, further planning conditions may be required depending upon further information from the applicant.

Condition 1: Reasonable Avoidance Measures (modified from the PEA)

No development or phase of development, including site clearance, shall commence until a 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:

- Details of timing, phasing and delivery of reasonable avoidance measures
- Details of a toolbox talk for contractors regarding protected species identification and protection status including GCN, herpetofauna, terrestrial mammals and bee orchids
- Plans to commit to daylight working to avoid the active period for wildlife
- Plans to elevate construction materials above ground-level and to avoid storing materials close to boundary vegetation
- Any holes, trenches, or other excavations in which wildlife may become trapped should be covered, infilled or a suitable escape route provided (e.g. wooden plank ramp or sloped exit) overnight, all such excavations should be inspected daily prior to works commencing
- Any pipes where wildlife may become trapped must be stored with caps to prevent wildlife entering them
- Any chemicals to be stored on site must be done so securely and to best pollution prevention guidelines
- Soil and other materials should be kept offsite, where kept on site these should be left un-compacted and not permitted to grass over to reduce the likelihood of terrestrial mammals using them for borrowing habitat
- Any habitat piles which may be suitable for sheltering amphibians, reptiles or small mammals such as piles of refuse, brash or log piles, should be retained in situ where possible

- Following site clearance, in the event that hibernating animals (such as hedgehog) are discovered onsite within the working area, all works in that area shall cease and a suitable buffer will be established, until an ecologist can provide guidance on how to proceed
- Should any priority species (e.g. hedgehog and slow worm) be discovered onsite at any time during their active period, they should be allowed to move away on their own volition or if in danger moved carefully with gloved hands to a sheltered area of suitable habitat (amphibians should be handled with damp gloves and toads should not be touched with bare hands as some species release toxins from their skin)
- If GCN are found on site during works, all works should stop and NRW/suitably qualified ecologist contacted for further advice

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

Reason: To protect GCN, amphibians, reptiles and terrestrial mammals which would otherwise be damaged/disturbed/ lost by the development hereby permitted.

No comments on the wording of this condition. An additional document will be submitted to discharge the condition.

Condition 2: Lighting Plan

No part of the development shall commence until an external bat friendly lighting scheme has been submitted to and approved in writing by the Local Planning Authority.

- Details of lighting to be used during and post construction
- Specifications of lighting to be installed in relation to the scheme
- 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.

Reason: To protect bats which would otherwise be disturbed by the development hereby permitted.

No comments on the wording of this condition.

Condition 3: Nesting birds

No clearance of scrub or trees on-site shall occur between the months of March and August inclusive, unless a suitably qualified ecologist has provided guidance or conducted a nesting bird survey within 48 hours prior to the commencement of works. If active nests are discovered, no vegetation disturbance shall take place until a suitably qualified ecologist confirms that the young have fledged and the nest is inactive.

Reason: In order to protect wildlife interests, which are afforded special protection.

No comments on the wording of this condition and we recommend this in our PEA report. We will be providing an Ecological Clerk of Works (ECoW) to oversee vegetation clearance for botanical species and GCN.

We also recommend this is our LEMP 498-LST-XX-XX-RP-L-1001.

NBB condition will be required, however further details are required prior to this being finalised.

As a planting plan has now been undertaken the NBB statement in the back of the PEA has been enhanced therefore we do not believe a condition on production of this is now required.