Futures Ecology Ltd
Carrwood Park
Selby Road
Leeds
LS15 4LG

Our Ref: FE500 / Wrexham Gateway / CC / JSE

Jack Britten
Cushman & Wakefield
London & South East

29th October 2026

By email: jack.britten@cushwake.com

Dear Mr Britten,

Wrexham Gateway – ECOLOGY COMMENTS

The following letter is has been prepared to provide additional information in response to comments made by Wrexham County Borough Council regarding the tree losses, retention and compensation which are outlined in the existing Statutory Biodiversity Metric Calculation associated with the Biodiversity Impact Assessment prepared by Futures Ecology on the 28th August 2025 to support planning application for Wrexham Gateway (**P/2025/0697**).

Baseline Tree Summary Information

There was a total of 26 individual trees located within the Site boundary. Ten of these trees are to be lost as a result of the proposals and sixteen are to be retained. The details regarding tree reference, size, condition within the Statutory Biodiversity Metric and whether they are to be retained or to be lost as a result of the development proposals is attached within Appendix A of this letter.

Proposed Tree Compensation

There are to be 85 small urban trees to be planted throughout the Site to suitably compensate for the loss of the ten trees outlined previously as a result of the planning proposals, the layout of these are provided within Appendix B, this was previously submitted as Figure 2: Proposed Habitat Plan of the Biodiversity Impact Assessment associated with the planning proposal.

This compensation was a result of discussion with the client regarding a previous failure to meet trading rules for the loss of trees, and a lack in viable compensation that would satisfy trading rules for '*medium distinctiveness'* habitats, primarily associated with the loss of trees within the Site boundary. Therefore, changes to the layout were made to produce the current revised Site layout that is provided within Appendix C.

The proposed planting of 85 trees throughout the Site is considered to be adequate compensation for the loss of the ten trees within the Site, as '*medium distinctiveness*' habitat trading rules are satisfied within the Statutory Biodiversity Metric as a result of the proposed habitats outlined by the proposals. The trading rules summary is outlined in Appendix D.

Within the Statutory Biodiversity Metric '*medium distinctiveness' habitats* require *'same broad habitat or a higher distinctiveness required'* in order to compensate for the loss of any '*medium distinctiveness*' habitat that is to be lost as a result of the proposals. As no '*high*' or '*very high*' distinctiveness habitats are proposed within the Site boundary, the compensation for the loss of trees comes entirely from the proposed tree planting within the Site boundary, and shows a cumulative broad habitat change of +0.34 Area Habitat Units associated with 'Individual trees'.

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

Yours sincerely,

[redacted]

James Eales
Managing Director
Futures Ecology
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1.0 APPENDIX A: BASELINE TREE SUMMARY

Tree Reference (Futures Ecology)	Tree Reference (Arb Report – Antea Group)	Condition (Statutory Biodiversity Metric: Condition Assessment)	Size (DBH – Antrea Group)	Lost	Retained
T28	T22	Condition: Good Passes: A, B, C, D, F. Fails: E.	Large (850mm)	-	Yes
T29	T21	Condition: Good Passes: A, B, C, D, F. Fails: E.	Small (4x100mm)	Yes	-
T30	T20	Condition: Moderate Passes: A, B, C, D Fails: E, F	Small (4x100mm)	Yes	-
T31	T4	Condition: Moderate Passes: A, B, C, D Fails: E, F	Medium (320mm, 370mm)	Yes	-
T32	G2	Condition: Moderate Passes: A, B, C, D Fails: E, F	Small (200mm)	Yes	-
T33	G2	Condition: Moderate Passes: A, B, C, D Fails: E, F	Small (200mm)	Yes	-
T34	T2	Condition: Good Passes: A, B, C, D, F. Fails: E.	Medium (325mm)	Yes	-

Tree Reference (Futures Ecology)	Tree Reference (Arb Report – Antea Group)	Condition (Statutory Biodiversity Metric: Condition Assessment)	Size (DBH – Antrea Group)	Lost	Retained
T35	G1	Condition: Good Passes: A, B, C, D, F. Fails: E.	Medium (550mm)	-	Yes
T36	G1	Condition: Good Passes: A, B, C, D, F. Fails: E.	Medium (550mm)	-	Yes
T37	T3	Condition: Good Passes: A, B, C, D, F. Fails: E.	Small (125mm, 175mm)	Yes	-
T38	G3	Condition: Moderate Passes: A, B, C, D Fails: E, F	Small (220mm)	-	Yes
T39	G3	Condition: Moderate Passes: A, B, C, D Fails: E, F	Small (220mm)	-	Yes
TG4	T19	Condition: Moderate Passes: B, C, D, F Fails: A, E	Medium (310mm)	-	Yes
TG4	T18	Condition: Moderate Passes: B, C, D, F Fails: A, E	Small (280mm)	-	Yes
TG4	T17	Condition: Moderate Passes: B, C, D, F Fails: A, E	Small (225mm, 200mm)	-	Yes

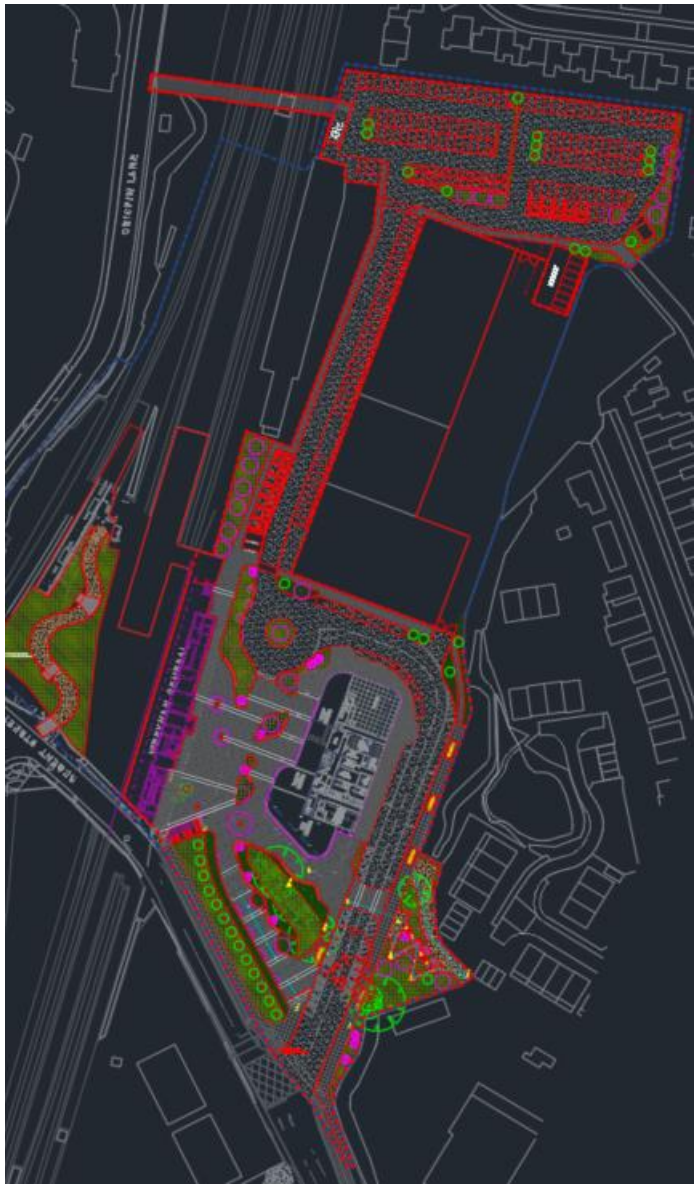
Tree Reference (Futures Ecology)	Tree Reference (Arb Report – Antea Group)	Condition (Statutory Biodiversity Metric: Condition Assessment)	Size (DBH – Antrea Group)	Lost	Retained
TG4	T16	Condition: Moderate Passes: B, C, D, F Fails: A, E	Small (270mm, 200mm)	-	Yes
TG4	T15	Condition: Moderate Passes: B, C, D, F Fails: A, E	Medium (280mm, 350mm)	-	Yes
TG4	T13	Condition: Moderate Passes: B, C, D, F Fails: A, E	Small (300mm, 250mm, 200mm)	-	Yes
TG4	T12	Condition: Moderate Passes: B, C, D, F Fails: A, E	Large (630mm)	-	Yes
TG4	T11	Condition: Moderate Passes: B, C, D, F Fails: A, E	Medium (370mm)	-	Yes
TG4	T10	Condition: Moderate Passes: B, C, D, F Fails: A, E	Medium (390mm)	Yes	-
TG4	T9	Condition: Moderate Passes: B, C, D, F Fails: A, E	Small (270mm)	Yes	-
TG4	T8	Condition: Moderate Passes: B, C, D, F Fails: A, E	Medium (420mm, 410mm, 300mm, 200mm, 200mm)	Yes	-

Tree Reference (Futures Ecology)	Tree Reference (Arb Report – Antea Group)	Condition (Statutory Biodiversity Metric: Condition Assessment)	Size (DBH – Antrea Group)	Lost	Retained
TG4	T7	Condition: Moderate Passes: B, C, D, F Fails: A, E	Small (220mm)	-	Yes
TG4	T6	Condition: Moderate Passes: B, C, D, F Fails: A, E	Medium (260mm)	-	Yes
TG4	T5	Condition: Moderate Passes: B, C, D, F Fails: A, E	Large (640mm)	-	Yes
			Totals: Large: 3 Medium: 10 Small: 13 Total: 26	**Lost:** Large: 0 Medium: 4 Small: 6 Total: 10	**Retained:** Large: 3 Medium: 6 Small: 7 Total: 16

2.0 APPENDIX B: PROPOSED HABITAT PLAN



3.0 APPENDIX C: LANDSCAPING PLAN



4.0 APPENDIX D: HABITAT TRADING SUMMARY: FE500_SBM01

Medium Distinctiveness						
Habitat group	Group	On-site unit change	Off-site unit change	Project wide unit change	Cumulative broad habitat change	
Cropland - Arable field margins cultivated annually	Cropland	0.00	0.00	0.00	0.00	
Cropland - Arable field margins game bird mix	Cropland	0.00	0.00	0.00		
Cropland - Arable field margins pollen and nectar	Cropland	0.00	0.00	0.00		
Cropland - Arable field margins tussocky	Cropland	0.00	0.00	0.00		
Grassland - Other lowland acid grassland	Grassland	0.00	0.00	0.00	0.07	✓
Grassland - Other neutral grassland	Grassland	0.07	0.00	0.07		
Grassland - Upland acid grassland	Grassland	0.00	0.00	0.00		
Heathland and shrub - Blackthorn scrub	Heathland and shrub	0.00	0.00	0.00	0.71	✓
Heathland and shrub - Bramble scrub	Heathland and shrub	0.00	0.00	0.00		
Heathland and shrub - Gorse scrub	Heathland and shrub	0.00	0.00	0.00		
Heathland and shrub - Hawthorn scrub	Heathland and shrub	0.00	0.00	0.00		
Heathland and shrub - Willow scrub	Heathland and shrub	0.00	0.00	0.00		
Heathland and shrub - Hazel scrub	Heathland and shrub	0.00	0.00	0.00		
Heathland and shrub - Mixed scrub	Heathland and shrub	0.71	0.00	0.71		
Lakes - Ponds (non-priority habitat)	Lakes	0.00	0.00	0.00	0.00	
Lakes - Reservoirs	Lakes	0.00	0.00	0.00		
Sparsely vegetated land - Other inland rock and scree	Sparsely vegetated land	0.00	0.00	0.00	0.00	
Urban - Cemeteries and churchyards	Urban	0.00	0.00	0.00	0.00	
Urban - Biodiverse green roof	Urban	0.00	0.00	0.00		
Individual trees - Urban tree	Individual trees	0.34	0.00	0.34	0.34	✓
Individual trees - Rural tree	Individual trees	0.00	0.00	0.00		
Woodland and forest - Other Scot's pine woodland	Woodland and forest	0.00	0.00	0.00	0.00	
Woodland and forest - Other woodland; broadleaved	Woodland and forest	0.00	0.00	0.00		
Woodland and forest - Other woodland; mixed	Woodland and forest	0.00	0.00	0.00		
Intertidal sediment - Littoral coarse sediment	Intertidal sediment	0.00	0.00	0.00	0.00	
Intertidal sediment - Littoral sand	Intertidal sediment	0.00	0.00	0.00		
Intertidal hard structures - Artificial hard structures with integrated greening of grey infrastructure (IGGI)	Intertidal hard structures	0.00	0.00	0.00		
		1.12	0.00	1.12		