

Wrexham County Council Trevor Basin Area Site Arrival & Car Park Draft GCN European Protected Species Licence Method Statement

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Trevor Basin Area Site Arrival & Car Park – Draft GCN European Protected Species Licence Method Statement

Author

Duncan Macaulay

Checker

Neil Madden

Approver

Sian Jones

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A Executive Summary

Site/project name:	Trevor Basin Area Site Arrival & Car Park
Applicant (developer) name:	Wrexham County Borough Council
Named Ecologist:	Neil Madden

This project forms part of a programme of work to improve movement infrastructure at key destination sites in Wrexham County Borough and Denbighshire, following a successful joint County Borough application to the UK Government Levelling Up Fund. This project is for access improvements and a new visitor car park with associated vehicular access on the brownfield site at Queen St, Cefn-mawr, Wrexham LL14 3NP, primarily for the Pontcysyllte Aqueduct & Canal World Heritage Site. The development area for the project forms part of a wider brownfield site that is locally recognised as the “Flexsys Site”. For the purpose of this method statement, this development area is hereafter referred to as the “Donor Site”.

Great crested newts (GCN) *Triturus cristatus* have been identified as an ecological constraint to the proposed works due to their presence within the Donor Site (incidental records) and positive environmental DNA (eDNA) results from three ponds within 50 m of the Donor Site.

A development licence is thus required to facilitate the proposed access improvement and visitor car park works. This draft method statement has been prepared in support of that development licence and in summary includes:

- The identification of two Receptor Sites.
- Habitat manipulation (vegetation removal, and hand and destructive searches) and the capture and exclusion of GCN from the Donor site. Note that a separate Conservation Licence application has been submitted to undertake these activities (and habitat enhancement measures within the Receptor Sites); however, this method statement allows for any residual activities that may be necessary.
- The erection of one-way amphibian-proof fencing.
- Habitat creation including the creation of two new GCN ponds.
- Post-construction habitat management and maintenance.
- GCN population monitoring of the three ponds within the Receptor Sites and the two new GCN ponds.

The location of the Donor and Receptor Sites are illustrated in **Figure 1 (see Appendix H1)**. Photographs of these areas are provided in **Appendix H2**.

The Receptor Sites are to be enhanced under a separate GCN Conservation Licence (licence reference to be confirmed for final Development Licence), in advance of this Development Licence, by creating purpose-built GCN habitat piles and improving the suitability of the GCN ponds. Materials used to create the habitat piles are to be collected from the Donor Site. However, the management and maintenance of these habitat creation and enhancement measures are included within this development licence.

B Background and Site Information

B1 Background to activity/development

This project forms part of a programme of work to improve movement infrastructure at key destination sites in Wrexham County Borough and Denbighshire, following a successful joint County Borough application to the UK Government Levelling Up Fund¹. This project is for a new arrival point and car park primarily for the Pontcysyllte Aqueduct & Canal World Heritage Site, which can be seen in Figure 5 and includes:

- Creation of 252 car parking spaces including electric vehicle charging points. This consists of:
 - 170 standard parking spaces surfaced in reinforced gravel
 - 25 mobility parking spaces surfaced in asphalt
 - 57 overflow parking spaces surfaced in reinforced grass
 - A coach park with the capacity for 9 coach spaces
- Landscaped footpaths with wayfinding features to guide users towards the Aqueduct;
- Asphalt and reinforced gravel vehicular routes;
- Welcome signage at the entrance of the Site;
- Seating for users around the Site;
- Gates and fencing around the perimeter of the site:
 - 1.8m high decorative vertical bar railings along Queen Street
 - 1.8m high weld mesh fencing around remaining site boundaries east of Queen Street
- Tree, woodland, shrub, grass, and fern planting;
- Open mosaic habitat creation;
- Creation of two ponds for GCN;
- Creation of two drainage ponds for SuDS attenuation; and
- Safeguarded location for a future kiosk and toilet block.

For the purpose of this draft method statement, this development area is hereafter referred to as the “Donor Site”. All works, completed under this method statement, will be undertaken within the Donor Site which is approximately 4.49 ha in size and two separate Receptor Sites that are situated adjacent north and south. Donor Site and Receptor Sites are described in **Section C5** of this method statement and their location is illustrated in Figure 1.

This draft version of the method statement has been prepared to support the planning application for these works. Once planning is obtained, the final version of the method statement (updated where appropriate) will be submitted as part of an application for a Development Licence. Works are programmed to commence in January 2025 and will continue until March 2025. The programme for these works is restricted by the completion date specified by the Levelling Up Fund.

B3 Actions Requiring Licensing

The proposed works have the potential to result in the following impacts on GCN, for which a licence is required: disturbance, damage and destruction to resting places, and disturbance, injury and killing of individuals.

B3 Preceding Conservation Licence

A separate Conservation Licence application has been submitted that will be implemented in advance of this Development Licence. The project includes:

- The creation of a minimum of 15 purpose-built habitat piles (refugia and hibernacula) within strategic locations within the Receptor Sites.
- The enhancement of ponds within the Receptor Sites.

¹ See <https://www.gov.uk/government/collections/new-levelling-up-and-community-investments> for details.

The purpose-built habitat piles will be constructed from materials obtained from the Donor Site. The Donor Site comprises a brownfield site of largely hard-standing substrate with patches of scrub and young trees, and multiple piles of anthropogenic materials (i.e. bricks and rubble). It is proposed that arisings from scrub/tree removal and a general Donor Site 'tidy' will be consolidated to create high-value, south-facing habitat banks and refugia within the core terrestrial zones of the ponds within the Receptor Sites. Arisings from enhancement works associated with the three ponds will also be used during habitat pile construction.

The Conservation Licence will therefore facilitate works which would reduce the likelihood of GCN occupying the Donor Site, including vegetation clearance and hand/destructive searches. Table 1 details the habitat creation and enhancement measures to be completed under the Conservation Licence.

Table 1: Habitat creation and enhancement measures to be completed under separate Conservation Licence

Location	Habitat Creation/Enhancement Measure
Habitat pile creation (Southern Receptor Site)	The following habitat piles are proposed: • 4 hibernacula; and • 6 refugia piles.
Habitat pile creation (Northern Receptor Site)	The following habitat piles are proposed: • 2 hibernacula; and • 3 refugia piles.
Pond 1 (Southern Receptor Site)	Trees and scrub are beginning to colonise its banks, particularly from the east. It is proposed that all woody vegetation along the pond's bank is removed. It is envisaged that this intervention will safeguard Pond 1's <i>Excellent</i> HSI score.
Pond 2 (Southern Receptor Site)	The pond surface is densely covered by macrophytes and trees and scrub are beginning to colonise its banks. It is proposed that 1/3 rd of the pond's macrophytes are removed and that all woody vegetation along the pond's bank is removed. It is envisaged that this intervention will improve Pond 2's HSI score from <i>Good</i> to <i>Excellent</i> .
Pond 3 (Northern Receptor Site)	The pond is heavily shaded by trees and scrub, limiting macrophyte growth and water quality. It is proposed that c. 50% of the trees and scrub (from SW to SE) are removed (NB: any mature trees with potential bat roosting suitability will not be felled). It is envisaged that this intervention will improve Pond 3's HSI score from <i>Average</i> to <i>Good</i> .

E2.4 Scaled Plans

Table 2 details the plans that have been produced in support of this method statement. These are provided within Appendix H1.

Table 2: List of plans associated with this method statement

Figure Ref	Description
Figure 1	Site and Pond Location Plan to the boundaries of the Donor Site, two Receptor Sites and location of ponds (including 500m radius around Donor Site).
Figure 2	Field Survey Results to show Donor Site and Receptor Site boundaries and GCN survey results (HSI and indicating which ponds were found to support GCN from eDNA sampling).
Figure 3	Impact Plan to show the location and extent of the different habitat types to be temporarily and/or permanently lost/damaged (as detailed in section D of the Method Statement). The plan also includes radii of 50, 250 and 500m around each GCN pond.

Figure 4	Capture and Exclusion Plan to show the location of one-way temporary amphibian fencing and the location of retained and developed sections of the Donor Site. The developed sections are the areas to be cleared during construction but note that it is anticipated that these areas will be cleared as part of a preceding Conservation Licence.
Figure 5	Final Development Layout Plan to show both the development layout and the location and extent of all terrestrial and aquatic habitat measures detailed in section E3 of the Method Statement. The plan also shows: - the location and extent of the terrestrial and aquatic habitats to be managed and maintained (in accordance with section E5.1 of this Method Statement). - The location all of the waterbodies to be monitored (as detailed in section E5.2 of this Method Statement). Measures employed to improve connectivity e.g. underpasses/tunnels, newt friendly traffic and /or drainage features (dropped kerbs/set-back gully pots) etc, are to be included within the final version of this method statement.

C Survey and Site Assessment

C1 Existing Information

There are three ponds within 500 m of the Donor Site:

- Pond 1 (P1) – situated approximately 40 m south;
- Pond 2 (P2) – situated approximately 15 m south; and,
- Pond 3 (P3) – situated approximately 20 m north.

The location of each pond can be seen on Figure 2.

COFNOD (North Wales Environmental Information Service) was consulted in July 2024 to provide ecological records from the last 20 years, within 2 km of the Donor Site. The desk study returned two records of GCN which are listed within Table 3.

Table 3: Existing GCN records provided by COFNOD within 2km of the Site

Year of Record	National Grid Reference	Distance & Direction from Donor Site	Location	Details
2015	SJ2756142683	30m north	Former Works Site, Aber-nant	Live sightings of GCN during ecological surveys within Pond 3
2015	SJ2827243493	900m northeast	Rear of Hapden Road, Wrexham	eDNA record

C2 Statutory Sites notified for GCN within 10 km

A single statutory designated site, notified for GCN, was identified within 10 km of the Donor Site; Johnstown Newt Sites Special Area of Conservation is situated approximately 3.6 km to the northeast of the Donor Site.

C3 Site/Habitat Description

The Donor Site is located at Queen Street, Cefn Mawr, Wrexham, LL14 3NP, centred at approximate grid reference SJ 27641 42599; the Donor Site boundary can be found in Figure 1 and Image 1, below. It forms part of a historic chemical plant which was demolished in the early 2010s and has remained largely disused ever since. The Donor Site and the land that extends to the north, east and south, have been extensively terraced by this 19th- and 20th-century industrial development, to create various building platforms and retaining walls. As a result, the ground levels vary across the Donor Site, with various terraces representing the surviving floors of demolished industrial buildings (and associated infrastructure).

The Donor Site comprises mainly hardstanding areas, brick walls and asphalt roads associated with the old plant. Colonising shrubs (dominated by buddleia *Buddleja davidii*, silver birch *Betula pendula* and bramble *Rubus fruticosus* agg.) have formed various pockets of scrub and areas of sparse ground flora (including rosebay willowherb *Chamerion angustifolium*, creeping buttercup *Ranunculus repens* and common hogweed *Heracleum sphondylium*).

The Receptor Sites were also part of the old chemical plant and are situated adjacent north and south of the Donor Site. They contain the three GCN ponds; two located to the south and one located to the north. All three ponds are lined and were created as fire ponds in the 1990's. Historically (until c. 2010-12) the ponds and their surrounding habitats were maintained but this ceased following the decommission of the chemical plant and the Southern Receptor Site now comprises unmanaged grassland with scrub and shrubs, whilst the northern Receptor Site is largely overgrown with trees and scrub. Image 1 provides aerial imagery of the Donor Site, Receptor Sites and the three ponds within 500 m, from 2021 (the most recent available aerial imagery) and prior to decommission of the chemical plant (2010).

Image 1: Aerial view of the Donor Site from 2021 and 2010



Figure 1 in Appendix H1 shows the location of the Donor and Receptor Sites and Appendix H2 contains various photographs of the habitats within the Donor and Receptor Sites.

C3 Field Surveys

Objective of survey:	To confirm presence of great crested newts in a specified area
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C3.1 Aquatic Habitat Suitability Index (HSI) and eDNA Survey

Habitat Suitability Index (HSI) assessments (as per ARG UK, 2010²) and environmental DNA (eDNA) surveys (following Biggs *et al.*, 2014³) were undertaken to assess suitability and confirm presence/likely absence of GCN at all three of the ponds in June 2024.

Survey results are shown in Table 4. Two incidental sightings of terrestrial GCN were also recorded during reptile surveys in 2024. This included one adult male and one adult female. Figure 2 illustrates the location of the Donor and Receptor Sites, the results of the HSI and eDNA field surveys and the location of these incidental sightings.

Table 4: Results of the HSI and eDNA surveys

Pond Reference:	Pond 1	Pond 2	Pond 3
SI1 – Location	A: (1)	A: (1)	A: (1)
SI2 - Pond area	550m ² : (1)	350m ² : 0.7	1250m ² : (0.92)
SI3 - Pond drying	Rarely: (1)	Rarely: (1)	Never: (0.9)
SI4 - Water quality	Moderate: (0.67)	Moderate: (0.67)	Poor: (0.33)
SI5 - Shade	30%: (1)	40%: (1)	80%: (0.6)
SI6 - Fowl	Minor: (0.67)	Minor: (0.67)	Minor: (0.67)
SI7 - Fish	Absent: (1)	Absent: (1)	Absent: (1)
SI8 - Ponds	2: (0.55)	2: (0.55)	2: (0.55)
SI9 - Terrestrial habitat	Moderate: (0.67)	Moderate: (0.67)	Poor: (0.33)
SI10 - Macrophytes	40%: (0.7)	95%: (0.85)	30%: (0.6)
HSI Score	Excellent (0.81)	Good (0.79)	Average (0.64)
eDNA Result	Positive	Positive	Positive

C6.3 Terrestrial Habitat Suitability Assessment

The Donor Site comprised a mixture of hard-standing, open mosaic habitats and woodland. These habitats have been ranked based on their suitability for GCN as follows:

- High suitability habitats – those that offer good opportunities for foraging and resting. This includes the Donor Sites semi-natural habitats (i.e. rough grassland, dense scrub and woodland) and areas of open

² Amphibian and Reptile Groups of the United Kingdom (2010). Advice note 5: Great Crested Newt Habitat Suitability Index. Amphibian and Reptile Groups of the United Kingdom.

³ Briggs, J., Ewald, N., Valentini, A., Gaboriaund, C., Griffiths, R.A., Foster, J., Wilkinson, J., Arnett, A., Williams, P. & Dunn, F. (2014). *Analytical and methodological development for improved surveillance of the Great Crested Newt. Appendix 5. Technical advice note for field and laboratory sampling of great crested newt (Triturus cristatus) environmental DNA*. Freshwater Habitats Trust, Oxford

mosaic habitat with good substrate structural diversity. Such habitats are likely to facilitate dispersal/migration.

- Moderate suitability habitats – those providing sporadic opportunities for foraging and shelter. This includes areas of dense scrub and open mosaic habitat with moderate substrate structural diversity. Such habitats are likely to facilitate dispersal/migration.
- Low suitability habitats – those providing limited/minor opportunities for foraging and shelter. This includes areas of early successional open mosaic habitat with low substrate structural diversity or low-quality resting places (such as areas of moss growth on hard-standing surfaces). Such habitats may facilitate dispersal/migration.
- Unsuitable habitats (referred to as ‘none’ in Figure 3) – those providing no resting or foraging opportunities for GCN. This includes bare/clean, intact asphalt car parking facilities and access roads through the Donor Site. Such habitats may facilitate dispersal/migration but are unfavourable.

The results of this assessment are illustrated in Figure 3 and are used further in Section D of this method statement.

C8 Interpretation/Evaluation of Survey Results

C8.1 Quantitative – Low Importance

The desk study returned only two records of GCN within 2 km of the Donor Site and there are only three ponds within 500 m of the Donor Site. In terms of habitat suitability, the three ponds ranged from ‘average’ to ‘excellent’ in the HSI scoring. The terrestrial habitat within the Donor Site varied in suitability, from bare/clean asphalt that provided negligible/sub-optimal opportunities for terrestrial GCN, to areas of woodland and scrub and rubble/brick piles that provided foraging, resting and overwintering opportunities.

In the absence of population estimates it is considered, at best, that the ponds within the Receptor Sites support a medium population of GCN (between 10 and 100 individuals) but, based on Pond 3’s HSI score, the ponds are likely to support a mixture of low and medium populations. The sedentary nature of the GCN coupled with terrestrial habitat suitability being more favourable within the Receptor Sites than the Donor Site means that it is reasonable to expect GCN abundance to be lower in the Donor Site than the Receptor Sites (i.e. the wider area). Further, the Donor Site represents a small proportion of a larger area of similar habitat across the former chemical plant.

The Spatial Action Plan for GCN in Wrexham (Russell *et al.*, 2017⁴) provides a scoring system to estimate the current conservation status (CCS) of the GCN population. The scoring system is presented in Table 5.

Table 5: Scoring system to assess the value and CCS of GCN ponds and populations

Score	1	2	3	4	5
Population size Class size: peak count of 6 visits using standard methods summed across all ponds within 250m.	None recorded	Few individuals, non-breeding. Count <4	Small Count 4-10	Medium Count 10-100	Exceptional Count >100
Number/density of ponds Include the surveyed pond and all other ponds within 500m.	Non-breeding pond	1 breeding pond	2-3 breeding ponds	4 breeding ponds	5+ breeding pond

⁴ Russell L, Starnes T and Wilkinson J (2017). Spatial Action Plan for Great Crested Newts in Wrexham, A Manual for Achieving Favourable Conservation Status. NRW Science Report Series. Report 77 pp 69, NRW, Bangor.

Habitat quality HSI following ARG UK (2010).	<0.5	0.5-0.59	0.6-0.69	0.7-0.79	>0.79
Prospects Identify threats to the pond and assess the likelihood of the pond persisting	Significant threats identified: pond unlikely to remain suitable for great crested newts within the near future.	Significant threats identified: pond unlikely to remain suitable in the long term.	Moderate threat level: pond is likely to remain suitable for some time, but condition is likely to decline.	Minor threats: pond likely to remain suitable in the long term.	No significant threats identified: pond certain (>95% likelihood) to remain suitable for foreseeable future.

Where a population is made up of more than one pond, each pond is assessed individually and then the total score for all the ponds is summed. Using this technique the following was determined:

Pond 1: population size (4) + number of ponds (3) + habitat quality (5) + prospects (3) = CCS of 15.

Pond 2: population size (4) + number of ponds (3) + habitat quality (4) + prospects (3) = CCS of 14.

Pond 3: population size (4) + number of ponds (3) + habitat quality (3) + prospects (3) = CCS of 13.

NB: a medium population size at each pond was used as a precaution and prospects was based on the lined nature of the ponds and from assessing habitat succession (i.e. scrub and tree colonisation) from historical aerial photography.

Russel *et al.* (2017) report that a population is considered viable if it contains a single pond with a score of 16, or two ponds each scoring 15. As these GCN ponds/populations do not qualify Russel *et al.* (2017) consider that this metapopulation is unfavourable / that these ponds/populations are not viable.

C8.2 Qualitative – Minor Importance

The Donor Site does not support breeding. The terrestrial habitats within the Donor Site varied in suitability from areas of negligible value to areas that provided foraging, resting and overwintering opportunities. Terrestrial habitats were more favourable in closer proximity to the breeding ponds (i.e. the Receptor Sites) and the Donor Site represents a small proportion of a larger area of similar habitat across the footprint of the former chemical plant.

C8.3 Functional – Moderate Importance

Within a local context, the GCN metapopulation is considered to be made up of populations within the northern and southern Receptor Sites, which comprise one and two ponds, respectively. This metapopulation appears to be completely isolated from any other ponds/populations.

The Donor Site is considered to facilitate foraging, resting and hibernating activity for a proportion of this local GCN metapopulation. Based on its location, the Donor Site is also considered likely to facilitate GCN movements/dispersal between the two Receptor Sites.

C8.4 Contextual - Low Importance

The sedentary nature of the GCN coupled with terrestrial habitat suitability being more favourable within the Receptor Sites than the Donor Site means that it is reasonable to expect GCN abundance to be lower in the Donor Site than the Receptor Sites. Further, the Donor Site represents a small proportion of a larger area of similar habitat.

This evaluation (of low quantitative importance) is supported by Russel *et al.* (2017). Map 2 within the Spatial Action Plan illustrates habitat value for GCN across Wrexham and the Donor Site and surrounding area falls within the '*suitable habitat outside of the core range*' land category which is assessed to have *low* value.

D Impact assessment

Donor Site area:	4.49 ha
Retained habitats area:	1.48 ha
Development area:	3.01 ha

This section assesses the potential impacts in the absence of mitigation or compensation measures. Figure 3 illustrates the location of retained and developed habitats.

D1 Habitat Impacts

D1.1 Breakdown of terrestrial impacts within the Development Area based on habitat type

Table 6 breaks down the total area of each habitat type that is subject to development activities in terms of permanent or temporary loss.

Table 6: Permanent or temporary habitat losses by habitat type

Permanent		Temporary	
Habitat type	Area lost (ha)	Habitat type	Area damaged (ha)
Open Mosaic Habitat	0.75	Open Mosaic Habitat	0.56
Sealed Surface	0.41	Sealed Surface	0.68
Broadleaved Woodland	0.27	Broadleaved Woodland	0.01
Mixed Scrub	0.32	Mixed Scrub	0.01
Total Loss	1.75	Total Damage	1.26

D1.2 Breakdown of terrestrial impacts within the Development Area based on habitat suitability

Table 7 breaks down the total area of each habitat suitability type that is subject to development activities in terms of permanent or temporary loss.

Table 7: Permanent or temporary habitat losses by habitat suitability

Permanent		Temporary	
Habitat suitability	Area lost (ha)	Habitat suitability	Area damaged (ha)
High	0.58	High	0.02
Moderate	0.01	Moderate	0.00
Low	0.75	Low	0.56
Unsuitable	0.41	Unsuitable	0.68
Total Loss	1.75	Total Damage	1.26

D1.3 Core, intermediate and distant terrestrial impacts

Table 8 breaks down the total area of core, intermediate and distant terrestrial habitat that falls within the Development Area that is subject to development activities in terms of permanent or temporary loss and the suitability of that habitat (based on the results of the Terrestrial Habitat Suitability Assessment).

Table 8: Core, intermediate and distant terrestrial impacts based on habitat suitability

Habitat Type	High	Moderate	Low	Unsuitable	Total
Permanent area lost (ha)					
Core (<50m from pond)	0.01	0.00	0.14	0.08	0.23
Intermediate (50-250m from pond)	0.52	0.00	0.61	0.34	1.47
Distant (>250m from pond)	0.05	0.00	0.00	0.00	0.05
Total (ha)	0.58	0.00	0.75	0.42	1.75
Temporary area lost (ha)					
Core (<50m from pond)	0.00	0.01	0.03	0.12	0.16
Intermediate (50-250m from pond)	0.02	0.00	0.53	0.55	1.10
Distant (>250m from pond)	0.00	0.00	0.00	0.00	0.00
Total (ha)	0.02	0.01	0.56	0.68	1.26

D1.4 Aquatic impacts

No aquatic habitats will be impacted (permanently or temporarily) as a result of the project.

D2 Pre- and mid-development impacts

Vegetation clearance, the removal of anthropogenic materials and hard-standing surfaces, and topsoil stripping could kill and injure newts and damage/destroy refuge sites.

GCN ponds associated with the project can be separated into two populations (that are part of the same metapopulation):

- Population 1 is centred around Pond 1 (P1) and Pond 2 (P2) which are situated approximately 20m apart within the Southern Receptor Site.
- Population 2 is centred around Pond 3 (P3), which is situated within the Northern Receptor Site.

A separate Conservation Licence has been applied for to improve/maintain the suitability all ponds for GCN and create habitat piles across the Southern and Northern Receptor Site (see

Table 1 for details) in advance of this Development Licence. Thus, the core terrestrial habitats that surround the ponds are already suitable for GCN but will be further improved in advance of any impacts associated with this method statement.

Core and intermediate habitats associated with these ponds will be affected; however:

- These constitute predominately low suitability and unsuitable habitats (i.e. limited in or lacking resting and overwintering opportunities)
- Habitat suitability across the Donor Site will be reduced as part of the Conservation Licence. This is significant for the 0.58ha of high suitability habitat; and,

- Suitable terrestrial habitats exist in closer proximity to these ponds and away from the Donor Site to the south and east.

When assessed against Table 6.5 of the GCN Mitigation Guidelines⁵ and in the absence of mitigation, the loss (permanently or temporarily) of core and intermediate habitats within the Donor Site would result in a low to medium scale of impact.

Given the close proximity of the three ponds that make up this metapopulation and the limited extent of distant habitats that are affected, impacts associated with habitat losses beyond 250m of the ponds are considered to be negligible.

In determining the scale of impact, it was important to consider the likelihood of GCN to be present within the Donor Site to be affected at the time of the works; the following has been considered:

- the semi-natural habitats surrounding the ponds are more stable/reliable and offer greater levels of cover and therefore security and motivation than the largely hardstanding habitat within the Donor Site;
- GCN are largely sedentary, likely preferring to use the closest suitable habitat to the adjacent breeding ponds and the majority of the population are unlikely to be motivated to travel through suitable habitats into areas of hardstanding to locate patches of suitable habitat within the Donor Site; and
- the longer-standing areas within the Donor Site which are likely to function as important refuge/over-wintering locations (i.e. woodlands) are to be retained and protected during the works.

D3 Long-term impacts

The Donor Site forms part of a historic chemical plant which was demolished c. 2010-12 and has remained largely disused since. Prior to its demolition, the chemical plant comprised buildings and maintained hard-standing and consequently the land situated between and to the east of the ponds was unsuitable for GCN (see

⁵ English Nature (2001) Great Crested Newt Mitigation Guidelines. English Nature, Peterborough.

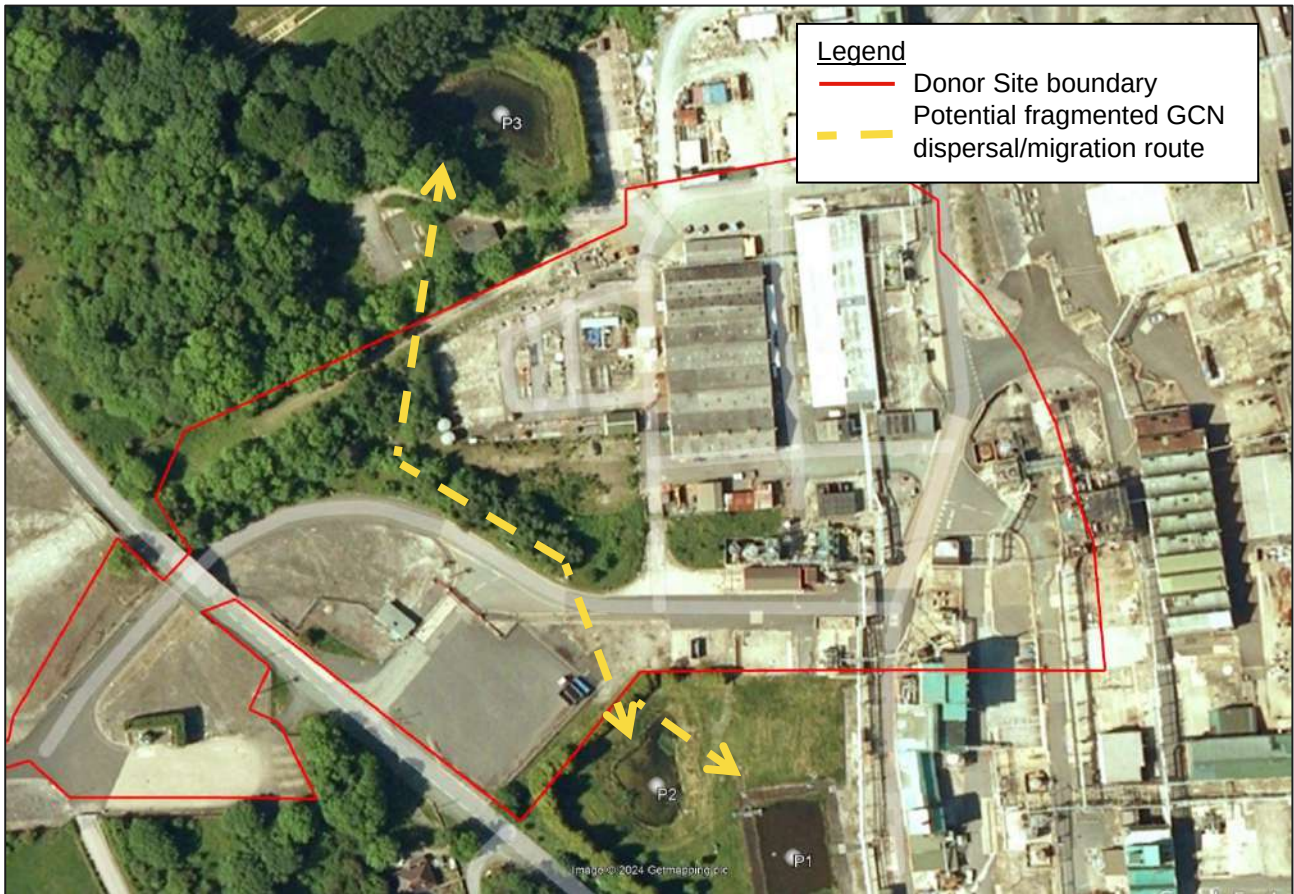
Image 2 for aerial photography from 2010). Further, the drainage solution associated with the chemical plant (gully pots, etc.) was unsympathetic for amphibians and is likely to have captured individuals. P1 and P2 were well connected (as they are at present) but the landscape was fragmented between the two GCN populations (i.e. P1/P2 and P3), inhibiting (but not completely restricting) movements/genetic interchange between the two GCN populations.

Since its decommissioning, the suitability of the habitats across the former chemical plant has improved for GCN. Refuse materials from demolition (rubble piles, etc.) created suitable resting and overwintering areas for GCN and areas have succeeded to an open mosaic habitat with patches of scrub and shrubs that provide further resting and foraging opportunities. Nevertheless, sealed surfaces remain (access roads and car parking/loading areas), as do the historic drainage features. The ground levels also vary across the chemical plant, with various terraces representing the surviving floors of demolished industrial buildings (and associated infrastructure).

Whilst connectivity between the two GCN populations is likely to have improved since the chemical plant was decommissioned, the current landscape is still considered to restrict movements/genetic interchange between the two GCN populations and further scrub/tree encroachment into the ponds is likely to reduce aquatic habitat suitability in the future. The proposed works will result in the reclamation of historical hard-standing areas and a change in land use but will also remove existing features that are likely to inhibit GCN movements (such as gully pots, kerbs and walls).

Nevertheless, in the absence of mitigation, the proposed development has the potential to further fragment the landscape between populations 1 and 2, potentially isolating the populations.

Image 2: Aerial view of the Donor Site in 2010 illustrating the fragmented landscape



D4 Post-development Interference Impacts

No post-development interference impacts are anticipated. The development will not result in an increase in visitors to the Receptor Site areas as the Donor Site will be permanently fenced.

D5 Other Impacts

Through strict adherence to a Construction Environmental Management Plan (CEMP), including the use of best practice methods and regular checks by an ECoW, accidental impacts and pollution incidents during construction will be avoided.

E Mitigation, Compensation and Monitoring

E1 The Mitigation Solution

The project has been designed to minimise adverse impacts on GCN by micro-siting the proposed development to target areas of bare ground or sparsely vegetated areas and to avoid direct impact upon woodland habitats and more established areas of open mosaic habitat (i.e. avoidance of the maturer habitat resource that would be more reliable for GCN from a resting/foraging perspective). Further, the proposed development has been designed to focus on habitat creation along its northern/eastern edge. This has been targeted due to its closer locality and better connectivity to existing/retained habitats so that the proposed development can deliver the greatest improvements to habitat connectivity and function in this setting.

It is envisaged that habitat provisions provided as part of the development will:

- Better connect the existing GCN ponds by creating an improved ecological network between them;
- Complement and strengthen the GCN population with the addition of two new ponds and areas of wetland; and,
- Safeguard and strengthen the Donor Sites function by retaining the more established habitats and creating areas of woodland and open mosaic habitats that complement those situated in the Receptor Sites and wider area. The creation of purpose built GCN habitat piles will also provide improved resting and overwintering opportunities.

E1.1 Killing and Injury

To minimise killing/injury and to improve terrestrial opportunities for GCN, a Conservation Licence (to be implemented prior to this Development Licence) has been applied for to facilitate the clearance of vegetation and refuge piles (rubble, etc.) across the Donor Site with arisings used to create purpose-built habitat piles (refugia and hibernacula) within the Receptor Sites. These works would be completed under the supervision of a named/accredited ecologist and be sensitive and phased, including a staged cut and GCN removal (if found).

To mitigate the risk of death or injury to GCN during the construction period, a combination of exclusion: using temporary amphibian fencing (TAF - which will remain in place for the duration of construction) and habitat manipulation will be undertaken. In broad terms, habitat manipulation comprises careful vegetation clearance in conjunction with hand and destructive searches, to render habitats unsuitable for GCN by removing potential resting places and displacing them to safeguarded habitat. The methodology for these methods is described in greater detail below.

The location of TAF is illustrated in Figure 4. It is proposed that one-way TAF be installed to the north and south of the Donor Site. The fencing will be installed to channel GCN towards the existing GCN ponds/Receptor Sites (that will have been enhanced as part of the Conservation Licence):

- It will be installed as per the GCN Mitigation Guidelines. However, due to the hard-standing nature of sections of the Donor Site, the fencing may have to be surface fixed (rather than buried). Note that the location of TAF installation (including access and egress) will be cleared as part of the above-mentioned Conservation Licence.
- Ends will be turned back at 45° to the fence for 1.5m to deflect amphibians towards the Receptor Sites. Fencing will also 'tie in' with existing features (walls, sealed hard-standing surfaces) to further inhibit any GCN movements into the Donor Site.

A full capture and exclusion exercise was not deemed appropriate/proportionate due to the difficulty of implementing a capture regime and the low number of GCN anticipated to be present within the Donor Site (particularly following the implementation of the Conservation Licence). The following was considered in reaching this conclusion:

- The nature of the Donor Site with road surfaces passing through, meant that it would not be possible to enclose the Donor Site with TAF.
- The relative ease of reclaiming the habitat within the Donor Site back to 'clean' hard-standing surfaces (as proposed under the Conservation Licence).
- Hard-standing surfaces would prevent pitfall trap installation, significantly reducing potential success.

- GCN are unlikely to be displaced from existing anthropogenic habitat piles without destructive hand searches (thus habitat manipulation is the most appropriate method for their displacement).
- Given that large areas of habitat within the Donor Site are retained or only temporarily disturbed (to facilitate habitat creation), translocation over 60 days across all habitats within the Donor Site would be of greater disturbance to the GCN population than the proposed works.

The following measures will be adopted to minimise the impact on GCN during Donor Site clearance and habitat creation. In order to be effective these measures will be undertaken during the active season for GCN, typically February to October but when ground temperatures are >5°C. Prolonged periods of hot dry weather (when GCN activity is reduced) will also be avoided.

Disease/biosecurity protocols (ARG UK, 2017⁶; provided as an Appendix H3) will be followed for all site operatives (ecologists and/or site contractors) undertaking works as part of this Development Licence.

E1.2 Tool Box Talk

Prior to the commencement of works, a briefing (a 'toolbox' talk) will be provided by the named ecologist or an accredited agent to all site personnel involved in the licensable works. This will include GCN identification, what to do if newts are found and what is permitted under the Development Licence. The toolbox talk will also include the methods to be adopted (as detailed below).

E1.3 Vegetation Clearance

It is proposed that vegetation clearance (to a height of 150mm) within the Donor Site will be completed in advance of this Development Licence (as part of the Conservation Licence, reference number TBC within final version of this method statement). Nevertheless, the methodology is included here to complete vegetation removal and in the eventuality that any residual vegetation remains following the completion of the Conservation Licence. The locations where vegetation is to be removed and retained are illustrated on Figure 4.

Works will be undertaken by appropriate hand tools or flail-mounted attachments. This is to ensure heavy machinery is not tracked over areas that provide potential resting places for GCN. Low-pressure vehicles may be used depending on the ground conditions and at the discretion of the overseeing ecologist. All vegetation clearance will be undertaken in a directional manner to discourage GCN away from the works area and towards the Receptor Sites. When clearing vegetation directionally care would also be taken to ensure that GCN are not directed to habitats that will be isolated from suitable surrounding GCN habitats.

Sensitive and phased vegetation clearance will be undertaken as part of the Conservation Licence within the Receptor Sites where habitat piles are to be created. Any remaining vegetation will be cut as part of this Development Licence. This is to make the habitats less suitable for GCN prior to soil stripping:

- Phase 1: cut any scrub and other tall vegetation to a height of c.150mm with all arisings removed (if not already reduced to this height under the Conservation Licence). The area will then be left undisturbed for at least 24 hours during suitable weather conditions;
- Phase 2: Where vegetation within the donor site remains dense, this will be cleared to ground level, with arisings removed. The area will again be left undisturbed for at least 24 hours during suitable weather conditions.

Where required and in line with construction activities, soil/substrate stripping will progress a minimum of 24 hours after the second phase of vegetation clearance, again working towards retained habitat areas.

E1.4 Capture and Release of GCN

It is proposed that hand and destructive searches (i.e. the removal of potential shelter features) across the Donor Site will be completed in advance of this Development Licence (as part of the Conservation Licence, reference number TBC). Nevertheless, the methodology is included here in the eventuality that any residual

⁶ ARG UK (2017). Advice Note 4, Amphibian Disease Precautions: A Guide for UK Fieldworkers. Version 2.

habitat piles remain/are discovered following the completion of the Conservation Licence. The locations where shelter features are to be removed and retained are illustrated in Figure 4.

Hand and destructive searches will only be carried out in the presence of the named ecologist or accredited agent. Hand searches comprise the dismantling and removal of potential refuges by hand and will be adopted during the first phase of vegetation removal and again prior to soil stripping to ensure any potential refugia obscured by vegetation is identified and removed.

Destructive searches comprise the careful stripping of potential refuge areas or habitat piles that could not be easily dismantled by hand (i.e. larger/heavier/ partially buried/labour-intensive refugia). Where possible, stripping of these areas will first be undertaken with use of non-mechanical hand tools, followed by machinery for any remaining areas.

Any GCN captured during this process will be handled (by hand; aquatic capture is not applicable) and, if necessary, temporarily held in a secure but ventilated container lined with damp vegetation and stored in a shady location prior to release.

Captured GCN will be held for no longer than 1 hour before they are relocated and released within the nearest Receptor Site at one of the completed purpose-built habitat piles (constructed as part of the Conservation Licence). Receptor Site locations are highlighted in Figure 1. Handling and translocation of GCN will only be undertaken by the named ecologist or accredited agent.

Arising from vegetation clearance and the dismantling of shelter features will be used to create habitat piles across suitable area within the Donor Site and the Receptor Sites. This will ensure that no net loss of potential shelter features takes place.

E1.4 Non-Target Species

The measures detailed for vegetation clearance and the capture and release of GCN will also be adopted for other amphibians, reptiles, small mammals.

E2 Receptor Site Selection

Two Receptor Sites have been chosen; both Receptor Sites are under the same land ownership as the Donor Site; Solutia UK Limited (a subsidiary of Eastman Chemical Company). Details relating to both Receptor Sites are provided in Table 9.

Table 9: Receptor Site Details

Site name and Location	Habitat description	Size (ha)	Adjacent Land Use
Southern Receptor Site (OS Grid Ref: SJ27554268)	Contains Ponds 1 and 2 and comprises unmanaged grassland with scrub and shrubs. Following the implementation of the Conservation License this Receptor Site will also comprise 10 purpose-built habitat piles (4 hibernacula and 6 refugia piles).	0.42	Hard standing and open mosaic habitat associated with the former "Flexsys Site", areas of woodland and residential gardens.
Northern Receptor Site (OS Grid Ref: SJ27614247)	Contains Pond 3 and is largely overgrown with trees and scrub. Following the implementation of the Conservation License this Receptor Site will also comprise 5 purpose-built habitat piles (2 hibernacula and 3 refugia piles).	0.86	Hard standing and open mosaic habitat associated with the former "Flexsys Site", extensive areas of woodland and cemetery.

E3 Habitat Creation, Restoration and/or Enhancement

E3.1 Aquatic Habitats

Aquatic habitat measures are detailed in Table 10.

Table 10: Aquatic habitat provision

Impacts			Compensation		
Effect	Number	Total Area (m ²)	Measure	Number	Total Area (m ²)
Lost	0	0	Created	2	641
Damaged	0	0	Enhanced	0	0*

*NB: Ponds 1, 2 and 3 (see Table 1) will be enhanced as part of the Conservation Licence. This equates to approximately 2150m² of aquatic enhancement.

Table 11 describes the creation, restoration or enhancement of aquatic habitats (include design and water body dimensions as per mitigation guidelines and waterbody location).

Table 11: Aquatic habitat design / enhancement measures and location

Pond reference	Surface Area (m ²)	Max. Depth (m)	Design / enhancement measures and location
Pond 4	340	1.5	Designed following the guidance provided by the Freshwater Habitat Trust for creating ponds for amphibians and reptiles (which focuses on GCN, common toad and grass snake) and will be constructed following the core structural principles for pond creation: • Create clean water ponds; • Locate ponds within the dispersal distance of the target species to provide stepping stones across the landscape and to strengthen existing populations;
Pond 5	301	1.5	• Design ponds with broad shallow margins; • Don't introduce fish or non-native plants; and, • Provide amphibian-friendly habitat adjacent to the pond. Both ponds are located to the north of the Donor Site in proximity to Pond 3 (to strengthen this population that currently contains only one pond) and within an ecological network of woodland and open mosaic habitat that will extend across the north and east of the Donor Site, connecting the two Receptor Sites and strengthening the connection between Ponds 1 and 2 with Pond 3.

E3.2 Terrestrial Habitats

Terrestrial habitat measures are detailed in

Table 12. This was calculated by remapping Core, Intermediate and Distant radii (to include the two new GCN ponds) and, measuring the areas of habitat creation using the Final Development Layout Plan (Figure 5), whereby created habitats that overlapped with baseline hardstanding/sealed surface were classified as created and all other created habitats were classified as restored/restated/enhanced.

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Table 12: Terrestrial Habitat Provision

	Impacts (Area lost (ha))		Compensation (Area gained (ha)*)	
	Permanent	Temporary	Created	Restored/ reinstated/enhanced
Core	0.23	0.16	0.27	0.89
Intermediate	1.47	1.10	0.29	1.51
Distant	0.05	0.01	0.00	0.06
Totals	1.75	1.27	0.56	2.46

*NB: Initial habitat creation works (see Table 1) will be conducted within the Receptor Sites as part of the Conservation Licence. These habitat measures are not included in this table.

The proposed development includes the creation of approximately 1.16 ha of open mosaic habitat (which also includes two new wetland attenuation basins) to complement the 0.4 ha of woodland and shrubs to be planted and the 1.48 ha of retained habitats (that includes woodland, scrub and existing open mosaic habitat) that are to be collectively managed to improve habitat structure, creating an extensive ecological network of open mosaic habitat.

The Intermediate Disturbance Hypothesis (Moi *et al.*, 2020⁷) proposes that biodiversity may be maximised in habitats subjected to an intermediate frequency and intensity of disturbance, creating mid-successional communities that also contain early and late successional species. The proposed open mosaic habitat creation/restoration within the Donor Site is based on this hypothesis and aims to 'disturb' areas by:

- Relaying substrates with nutrient-poor, vegetation-free substrate on the surface.
- Maximising substrate structural diversity by:
 - including larger almost solid materials (such as concrete provided it is partly broken), rubble and finely 'powdered' materials (such as sand).
 - installing at a variety of depths with the majority created greater than 450mm deep to provide access below the frost zone to provide overwintering opportunities for GCN.
 - Distributing substrates using a toothed bucket to increase micro-topography and ensuring any construction 'scars' such as track marks are not levelled off/graded.
- Using coppiced materials and tree stumps to create refuge/deadwood piles within the habitat. These will comprise a mixture of surfaced fixed and partially buried features.

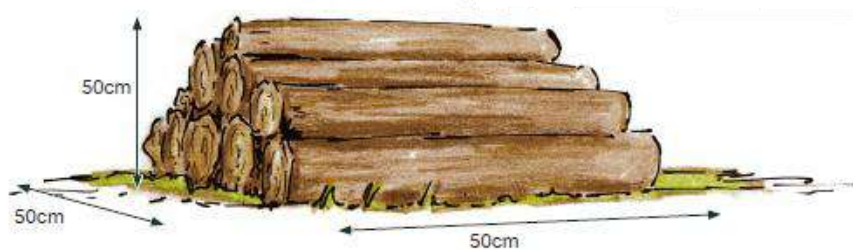
To mitigate for the loss of potential resting places for GCN within the Donor Site, arisings from construction-related vegetation clearance and clearance of anthropogenic materials will be used to provide areas of shelter. In addition to the habitat piles created as part of the separate Conservation Licence, a minimum of two refuge habitat piles and two hibernacula-type piles will be created in proximity to each of the two new ponds (i.e. Ponds 4 and 5).

Hibernacula will be installed as per the design within the Design Manual for Roads and Bridges (Volume 10, Section 4, Part 7; HA 116\05⁸); however, they will be much larger in area, each comprising a minimum of 10m².

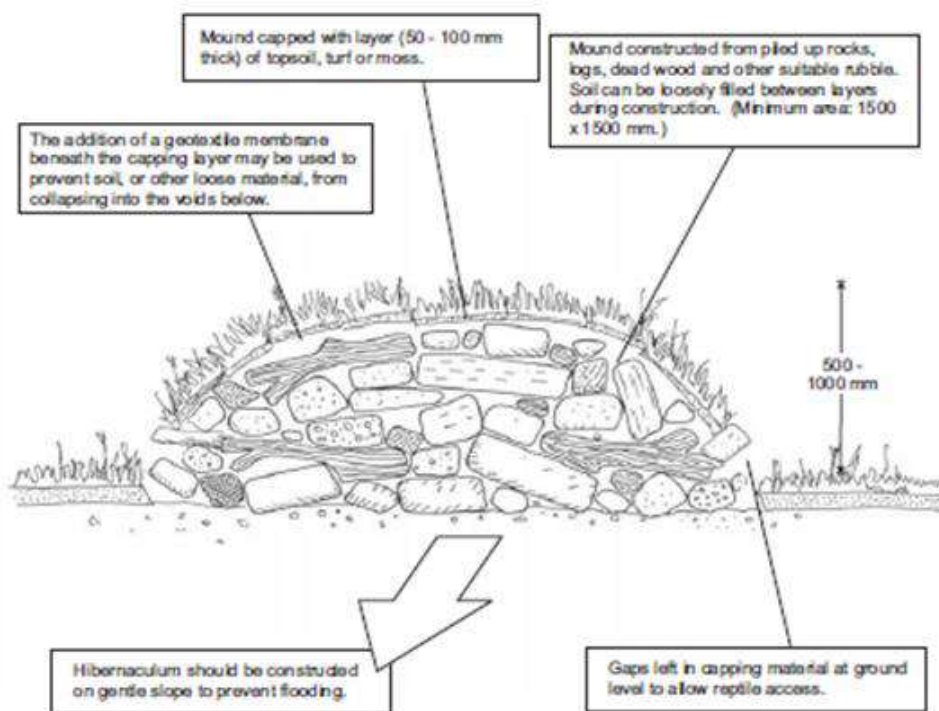
Insert 1: Indicative refugia design

⁷ Moi DM, García-Ríos R, Hong Z, Daquila BV, and Mormul RP (2020). Intermediate Disturbance Hypothesis in Ecology: A Literature Review, *Annales Zoologici Fennici* 57(1-6), 67-78.

⁸ Design Manual for Roads and Bridges (2005). Volume 10 Section 4 Part 7 (HA 116/05) Environmental design and management. The good roads guide - Nature conservation. Nature conservation advice in relation to reptiles and roads (Withdrawn).



Insert 2: Hibernacula Design as per Design Manual for Roads and Bridges (HA 116\05)



Contingencies for these measures are as follows:

- Regular checks of the amphibian-proof fencing are to be made by a named/accredited ecologist. If the fencing is found to have been breached (by deterioration or any other means) this will be rectified;
- Regular communication between the contractors and named/accredited ecologists will be maintained to ensure no works requiring ecological supervision commence without it; and
- The Receptor Sites will be checked to ensure suitability for any rescued GCN found during the works within the Donor Site.

E3.3 Conservation status

Using the technique outlined in the Spatial Action Plan for Wrexham, we have calculated the anticipated CCS of the GCN population, inclusive of mitigation undertaken as part of the Conservation and Development licences:

- Pond 1: population size (4) + number of ponds (5) + habitat quality (5) + prospects (4) = CCS of 18.
- Pond 2: population size (4) + number of ponds (5) + habitat quality (5) + prospects (4) = CCS of 18.
- Pond 3: population size (4) + number of ponds (5) + habitat quality (4) + prospects (4) = CCS of 17.
- Pond 4 (new): population size (4) + number of ponds (5) + habitat quality (3) + prospects (4) = CCS of 16.
- Pond 5 (new): population size (4) + number of ponds (5) + habitat quality (3) + prospects (4) = CCS of 16.

With the implementation of this method statement/these habitat provisions (new ponds and terrestrial habitat improvements), Russel *et al.* (2017) consider that this metapopulation would be improved too favourable/viable.

E4 Integration with Roads and Other Hard Landscapes

The drainage solution for the project is still in development but has been specifically designed to ensure that it is 'amphibian friendly' maintaining connectivity across the Donor Site whilst avoiding the need for lengthy permanent amphibian fencing and underpasses. This has been achieved by using permeable paving across the majority of the Donor Site to convey water run-off to wetland attenuation basins. Where gully pots are necessary, the following safeguards have been put in place:

- The minimum number of gully pots has been used and the development has aimed to avoid the use of gully pots within 50m of existing/proposed GCN ponds, between the two Receptor Sites and in proximity of the habitat corridor created along the eastern and northern periphery of the Donor Site.
- Gully pots will be installed with 'Wildlife Kerbs' that provide a "bypass pocket" set into the kerb that allow the movement of GCN passed the gully.
- Gully pots will be installed with 'Wildlife Gully Ladders' to help any GCN to safely escape from gullies'.
- Access chambers will be installed with a 'full floor' cover lid or elevated from the ground level to prevent entrapment.

Details relating to the drainage solution will be highlighted on the final version of Figure 5.

E5 Post-development Site Safeguard

E5.1 Habitat Management & Maintenance

The following management operations will occur within the Donor Site in perpetuity:

- Aquatic vegetation management in ponds.
- Desilting and clearance of leaf-fall.
- Clearance of shading tree or scrub cover around pond margins.
- Mowing or cutting of grassland.
- Woodland, scrub and open mosaic habitat management.

The following maintenance operations will occur within the Donor Site in perpetuity:

- Checking for fish presence, and removal through appropriate methods.
- Checking pond condition and remedial action as required.
- Checking for and removal of dumped rubbish.
- Reinstatement of habitats following fire, acute pollution or other major damage.

E5.2 Post-development Population Monitoring

Ponds 1, 2, 3, 4 and 5 will be subject to HSI and population size class assessments (i.e. 6 visits following GCN Mitigation Guidelines). Monitoring will be undertaken as follows:

- 2025 - year 1 post pond creation/development;
- 2026 - year 2 post pond creation/development;
- 2028 - year 4 post pond creation/development; and,
- 2030 - year 6 post pond creation/development.

E5.3 Land Ownership

Land ownership agreements are still in progress and will be provided as part of the actual/final licence application.

E5.4 Site Safeguard

The following mechanisms for site safeguard are currently being sought and will be provided as part of the final licence application:

- Clause to relinquish future development rights within S106 agreement applies to the Donor Site.

- Land Management Agreement with Solutia UK Limited (a subsidiary of Eastman Chemical Company) applies to the Receptor Sites.
- Confirmation from Solutia that:
 - They accept and are committed to implementing the measures specified within this method statement; and
 - That the areas of mitigation and compensation land within the Donor Site and the Receptor Site are free from future development.

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F Schedule of Works

Table 13: Timetable of Development and Mitigation/Compensation Activities

Activity	Timing	Comments
Receptor Site enhancement	Sep-24 to Mar-25	Enhancement works (detailed within Table 1) are to be undertaken as part of the preceding Conservation Licence.
Temporary newt fence installation	Jan-25	Newt fence installation will be undertaken under the direct supervision of ecologists within areas cleared as part of the preceding Conservation Licence.
GCN capture (outside of hibernation/dormancy periods only), hand searches and destructive searches	Jan-25 to May-25	GCN capture anticipated during habitat manipulation. These works are planned to be completed as part of the preceding Conservation Licence (during 2024); however, residual features may need to be cleared as part of this Development Licence.
Construction period (start and end dates)	Jan-25 to May-25	
Site checks and maintenance during construction	Jan-25 to May-25	Monthly integrity checks of fencing during construction periods.
Temporary newt fence removal	May-25	Removal will be undertaken under the direct supervision of ecologists.
Habitat creation works within Donor Site	Jan-25 to May-25	As described in Section E2.

Table 14: Monitoring, management and maintenance

Year:	2025	2026	2027	2028	2029	2030	2031
Population monitoring	Yes	Yes		Yes		Yes	
Habitat management		Yes	Yes	Yes	Yes	Yes	Yes
Site maintenance		Yes	Yes	Yes	Yes	Yes	Yes

Year:	2032	2033	2034	2035	2036	2037	2038
Population monitoring							
Habitat management		Yes	Yes	Yes	Yes	Yes	Yes
Site maintenance		Yes	Yes	Yes	Yes	Yes	Yes

G Declaration

Declaration will be completed within the final application.

I declare that should a licence be granted, the work as proposed in this Method Statement will be strictly adhered to. I understand that any deviation from the works as proposed in this Method Statement without agreement from NRW would result in a breach of the licence. NB. Applicants should note that it is an offence under regulation 59 of the Conservation of Habitats and Species Regulations 2017 to knowingly or recklessly provide false information in order to obtain a licence.			
Signature of the Applicant		Date	
<i>For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.</i>			
Full name in BLOCK LETTERS			
Signature of the Ecologist		Date	
<i>For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.</i>			
Full name in BLOCK LETTERS		Neil Madden	

H Appendices

H1 Figures

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H2 Site Photographs



Aerial view of Donor and Southern Receptor Sites taken in August 2024.



Typical terrestrial habitats within the Donor Site



Typical terrestrial habitats within the Donor Site



Small area of broadleaved woodland in the centre of the Donor Site



Small area of broadleaved woodland in the southwest of the Donor Site



Typical terrestrial habitats within the Southern Receptor Site.



Pond 1 within the Southern Receptor Site



Pond 2 within the Southern Receptor Site



Pond 3 within the Northern Receptor Site



Typical terrestrial habitats within the Northern Receptor Site.

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H4 Site Safeguard

To be provided within the final version of this method statement.

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Arcadis Consulting (UK) Limited

80 Fenchurch Street
London
EC3M 4BY
United Kingdom
T: +44 (0)20 7812 2000

[arcadis.com](https://www.arcadis.com)

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