Ecological Impact Assessment Addendum



Cefn Way, Wrexham

April 2025

TG Report No. 13539_R009_DM

Tyler Grange

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Section 1: Introduction and Context

Introduction

1.1. This report has been prepared by Tyler Grange Group Ltd. (TG) on behalf of Harworth Group. It sets out the findings of the ecological surveys and reports in relation to a parcel of land at Cefn Road, Wrexham (OS Grid Reference SJ 3548 5092), which is proposed for phased residential development. Over the period of surveying and reporting on site the Red Line Boundary (RLB) has altered several times, the latest adjustment being in December 2024. This addendum to Ecological Impact Assessment (13539_R05b EcIA March 2024) seeks to provide an update to the conclusions and recommendations section of this report only. The proposed plans are shown in **Appendix 1**.

Site Context

1.2. The wider site mainly comprises arable fields and amenity grassland, in use as playing fields, bordered by hedgerows and mature trees; public footpaths also cross the site at several points. Cefn Road runs along the western site boundary, and Bryn Estyn Road along the northern boundary. Residential development lies to the north and west of the site, and agricultural fields to the south and east. Wrexham Industrial Estate is located 1.1km east of the site. The current red line boundary is shown below in **Figure 1.1**.

1.3. The description of the development states: ”Outline Planning Application for Residential development for the construction of up to 900 residential dwellings with associated infrastructure (playing fields, open space and SUDs attenuation) with all matters reserved except for detailed means of primary highway access”



Figure 1.1 – Site Boundary

Purpose

1.1. This report:

- Consider the shifts to conclusions and mitigation recommendations to Ecological Impact Assessment (13539_R05b EcIA March 2024), based on the RLB shift since time of issue

Section 3: Ecological Impacts, Mitigation, and Enhancement

Proposed Development

3.1. The Proposed Development comprises a phased residential development for the construction of up to 900 residential dwellings with associated infrastructure (primary school, playing fields, open space and SUDs attenuation) with all matters reserved except for detailed means of primary highway access. The Proposed Development will be divided into 2 phases; Phase 1 comprises development in the north-west and south-west of the Site for up to 600 units. Phase 2 will comprise the development of the central area of the Site to provide an additional 300 units. The link road will also be provided in this phase, which does not extend past the northern Site boundary.

3.2. Ecological issues associated with the Proposed Development include the loss of foraging and potential roost habitat for bat species, loss of nesting and foraging habitat for birds, potential loss of foraging habitat for badgers and hedgehogs, the fragmentation of a medium sized meta population of GCN across the wider area and the potential spread of invasive species (Japanese knotweed).

Designated Sites

3.3. No change please consult Ecological Impact Assessment (13539_R05b EcIA March 2024) for full details.

Habitats and Flora

3.4. Current development proposals include the retention of the vast majority of the hedgerows and scattered trees through and surrounding the Site, and the complete retention of the on-site pond and woodland copse (these are placed in the SW of site within the sports pitch area), which comprise the habitats of local ecological importance within the site. Overall, the native planting of trees, shrubs, and grassland is expected to improve the site overall for biodiversity

3.5. Potential impacts to retained hedgerows and trees may occur during construction resulting from issues including inadvertent damage, or inappropriate storage of materials. Potential impacts to retained habitats of ecological importance, including inadvertent damage or degradation, pollutant run-off and inappropriate storage of materials will be mitigated through the implementation of an Arboricultural Method Statement (AMS) and CEMP. Measures to mitigate any losses to hedgerow units onsite include hedgerow planting.

3.6. Invasive non-native species are present in the western side of site and mitigation will be required to control the potential spread of these species beyond the site boundary to ensure compliance with legislation. An appropriate management strategy for removal and/or treatment of invasive non-native species (including Japanese knotweed) to control their spread beyond the site boundary should be devised and implemented by a specialist contractor prior to the commencement of site clearance or construction activities.

3.7. A Landscape and Ecological Management Plan (LEMP) should be devised and implemented to ensure success and long-term viability of retained and newly created habitats.

Protected and Notable Species

Amphibians

3.8. Current development proposals include the retention of the pond used by breeding GCN, as well as the surrounding woodland copse, maintaining breeding habitat within the Site. In addition, the vast majority of the hedgerows will be retained to allow the species to commute through the Site. The sports pitches surrounding the on-site pond and badger Sett 2 on the northern-eastern Site boundary will be retained, allowing continued access to the wider GCN population within the three ponds (Pond 3, Pond 4 and Pond 5) lying to the north of the Site.

3.9. The proposed eastern and southern SUDS, could also be improved for GCN through appropriate design, with ecologically sensitive planting included in associated with the SUDs which, if designed and managed correctly including opportunities for hibernation/refuge, could introduce more suitable terrestrial habitat than is currently present. A suitable LEMP or Ecological Enhancement Plan should be created to ensure the long-term management of the retained and proposed habitats.

3.10. To ensure GCN are not dissuaded from commuting around the Site, and to further breeding ponds to the north-east, a Lighting Plan should be produced detailing the creation of dark corridors through the Site. These dark corridors should include the hedgerows through and surrounding the Site, the retained badger setts, the woodland copse and pond, the sports pitches (especially those connecting the woodland copse and Sett 2), the SUDS area in the east of the Site which will include ecologically sensitive planting.

3.11. The CEMP should include Precautionary Working Methods to protect common amphibians during the construction phase, including a check for the species group by a SQE during clearance of suitable habitat.

3.12. A great crested newt licence will be required from Natural Resources Wales to mitigate the loss of GCN terrestrial habitat within 250 m of breeding ponds and reduce the risk of killing/injuring individuals. The Receptor site for Phase 1 would be the woodland surrounding Pond 6. For phase 2, this could be the eastern SUDS area within the site.

Outline Mitigation Strategy

3.13. The below process will need to be implemented per development phase. Starting with Phase 1, the whole phase will need to be enclosed with the use of Temporary Amphibian Fencing (TAF). The fencing can only be installed in the 'active' season for GCN (i.e. between March and October). Once the fencing is in place, a 60-day trapping period will commence based on the presence of a medium-sized metapopulation and in line with mitigation guidelines. This will comprise installing buckets sunk into the ground on the inside of the fenceline, and checking these buckets on a daily basis for a 60-day period, with any GCN or amphibians caught moved off-site to a receptor area. For Phase 1, this will be the woodland surrounding Pond 6. Once the 60-day period is over (and with a period of 5 days of no GCN caught at the end), development works can commence, with the TAF maintained and monitored for the duration of the construction period. Only when all development works are complete in Phase 1 (or any other phase) can the fencing be removed and GCN allowed to move through the developed site. It may also be necessary for destructive searches of certain areas to be undertaken during the 60-day exclusion period to facilitate the exclusion efforts. This will be at the discretion of the licensed ecologist.

3.14. The remaining phases will proceed in the same fashion and any GCN caught relocated to the most suitable receptor site, for Phase 2 this could be the eastern SUDS area.

3.15. As there is no loss of breeding habitat for GCN associated with the development, there is no recommendation for replacement pond features in any phase. The proposals across all phases account for the creation of SUDs features, which will offer some limited suitability for GCN if designed appropriately. Across all phases, there is also the ability to create GCN hibernacula around SUDs features to provide additional opportunities for hibernation/refuge.

3.16. It is considered, overall, that the loss of terrestrial habitat overall across all phases would not be significant and therefore would not require significant amounts of mitigation. The areas of grassland planting associated with SUDs features, if designed and managed correctly could introduce more suitable terrestrial habitat than is currently present.

3.17. The detailed design for each phase must also ensure that the risk of amphibian mortality is reduced in the operational phase of development by introducing modified kerbs around gulley pots in the site.

Badger

3.18. Recommendations for badger can be found within confidential Badger Survey report **13539 R07.**

Bats

3.19. The retention of the mature scattered trees will provide continued roosting opportunities for bats through development. The retention of the trees, as well as the hedgerows, woodland and pond will also preserve the highest value habitats for foraging and commuting bats on-site.

3.20. The AIA (reference **13539_R01f**) details that only one tree with bat roosting potential in Phase 1 will require removal, Tree 28, which has Low bat roosting potential. Tree 28 must therefore be section-felled in the presence of a SQE. Should plans for Phase 1 change, and High or Moderate bat roosting potential trees require removal, the trees to be removed must be subject to Aerial Inspections or Nocturnal Surveys. The detailed results and mitigation measures resulting from the further surveys and PRA should be detailed as part of the reserved matters application for each phase on the Site. A series of bat boxes should be installed in each phase to mitigate the loss of any potential roost features.

3.21. The majority of hedgerows will be retained on-site, however the small areas of hedgerow loss should be replaced within the Site, using native species in ecologically strategic locations to improve bat commuting habitat. Hedges to the North East of the site close to the off-site lesser horseshoe roost could be enhanced with double hedge planting to ensure robust commuting routes.

3.22. To ensure bats are not dissuaded from commuting around the Site, or cut off from foraging habitat within/surrounding the Site, a Lighting Plan should be produced detailing the creation of dark corridors through the Site. These dark corridors should include the hedgerows through and surrounding the Site, the retained badger setts, the woodland copse and pond, the sports pitches (especially those connecting the woodland copse and Sett 2), the SUDS area in the east and south of the Site, a 20 m sewer easement running through the centre of the site which will include ecologically sensitive planting. The CEMP should also detail that these areas should be kept as dark areas during construction and include sensitive construction lighting.

3.23. The Site is located within the CSZ of the lesser horseshoe maternity roost located within Erlas Victorian Walled Garden estate approximately 260 m north of the Site. As the Site largely provides habitat of low foraging value i.e. arable land, it is assumed the species generally commute east to forage. The Proposed Development details the general retention of the higher value foraging habitats (woodland, pond, hedgerows), with the loss of the arable land, and as such only sub-optimal foraging habitat within the CSZ to be lost in both Phase 1 and Phase 2. To mitigation this loss of sub-optimal foraging habitat, the SUDS area in the south and east of the site with be planted sensitively for ecology, and maintained as a dark area, to provide higher value foraging habitat within the CSZ then is currently present. This is deemed sufficient mitigation for both phases.

Birds

3.24. All birds, their nests and eggs, are protected by law and as such it is an offence to intentionally kill, injure, or take any wild bird; intentionally take, damage, or destroy the nest of any wild bird while it is in use or being built; and intentionally take or destroy the egg of any wild bird.

3.25. The general retention of the woodland, scattered trees and hedgerows will preserve nesting habitat for passerine species within the Site. The amenity grassland pitches important locally for foraging starling and thrushes will also be retained.

3.26. To avoid triggering the legislation protecting nesting birds, clearance of suitable habitat (arable fields, trees, and hedgerow) should be timed outside the nesting bird season (generally taken as March to September inclusive, though this is not defined in law and birds may nest outside of this time). If any clearance works to nesting habitats are required during the nesting season, then pre-removal checks for nesting birds must be carried out by a suitably experienced Ecological Clerk of Works (ECoW), no more than 48 hours prior to the works commencing. If any nesting birds are found to be present, an appropriate buffer zone will be implemented, within which works are excluded for the duration of the breeding attempt. Any active nests will need to be left in-situ until a suitably experienced ecologist confirms that the chicks have fledged and the nest is no longer active.

3.27. The majority of scattered trees and hedgerows will be retained on-site, however the small areas of loss should be replaced within the Site, using native species in ecologically strategic locations to improve bird nesting habitat. A series of bat boxes should also be included within each Phase to provide further nesting opportunities.

3.28. The Proposed Development of both phases would result in the loss of habitat which supports up to three pairs of breeding lapwing, loss of suitable arable habitat used by the three lapwing territories is unlikely to be significant in maintaining populations locally, as there will be regular changes in farmland use locally. This means the species is unlikely to show specific fidelity to arable habitat within the Site for breeding. In addition, the wider landscape contains large areas of similarly suitable habitat for this species to move into. However, mitigation will also be provided on-site in the eastern SUDS area, a 20 m sewer easement running through the centre of the site , which will be planted and managed to consider nesting lapwing, and in turn also benefit a wide range of other bird species should the SUDS features also be ecologically designed. This area is deemed sufficient mitigation or both phases.

Hedgehog

3.29. The general retention of the woodland and hedgerows will provide foraging and commuting habitat for hedgehog post development.

3.30. Hedgehog are a priority species and therefore afforded consideration in planning policy. Hedgehog are in population decline, efforts should be made to conserve this species and enhance sites for hedgehog wherever possible, by creating 'hedgehog highways' (appropriately sized gaps under boundary fencing to allow the free movement of hedgehog), including a series of hedgehog houses in the Proposed Development and implementing safe working methods, such as:

- Storing construction materials in skips or off the ground in pallets where possible;
- Ensuring any excavations are sealed overnight, or left ramped or with an exit should any hedgehogs or other small mammals become trapped;
- Capping any pipework overnight, and;
- Vegetation which could provide suitable habitat for sheltering hedgehog should be checked by and ecologist prior to vegetation clearance.

Brown Hare

3.31. The CEMP should include Precautionary Working Methods to protect brown hare during the construction phase, including a check for the species by a SQE during clearance of suitable habitat.

Section 4: Section 3: Green Infrastructure Statement

4.1. Version 12 of PPW includes requirements for '*Net benefit for Biodiversity and Step-wise Approach*'. Application of the mitigation hierarchy/step-wise approach is fundamental to the ecological impact assessment process. This requires consideration of the following measures, in order of priority, for all potential impacts, to determine the most appropriate mitigation, compensation and enhancement strategy for the project. This is set out below:

- Avoid
- Minimise
- Mitigate/restore
- Compensate on-site
- Compensate off-site

4.2. The PPW states that 'a green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal… The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach has been applied.'

4.3. The following section therefore comprises the Green Infrastructure Statement and includes how Net benefit for Biodiversity and the Step-wise Approach has been incorporated on-site.

Net Benefit for Biodiversity and the Step-wise Approach

4.4. The proposed development will largely affect habitats of negligible ecological importance, such as arable land, amenity grassland, scrub and tall ruderal, which requires no specific mitigation for its loss and which would have limited impact on fauna which use it. As such, in accordance with the step-wise approach, impacts to flora and fauna are therefore avoided/minimised as far as possible. Where negligible ecological importance habitats may be of use to protected species, mitigation to protect the species is recommended, such as nesting bird checks of the arable land, scrub and tall ruderal if removed in nesting bird season to protect breeding birds, and a pre clearance check of the scrub and tall ruderal for common amphibians and hedgehog, as detailed in **Section 3** of this report.

4.5. Those habitats within the site which have been identified as being of 'local' ecological importance and/or priorities for conservation under Section 7 of the Environment (Wales) Act 2016 are those which the step-wise approach seeks to address. In the context of the site, these habitats are:

- Broadleaved woodland;
- Scattered trees;
- Hedgerows;
- Pond

4.6. Current development proposals include the complete retention of the on-site pond and woodland copse. In addition, the vast majority of the hedgerows and scattered trees through and surrounding the Site will be retained, avoiding impacts to flora and fauna through development. To protect the retained habitats within the site, a CEMP and AIA will be produced for all phases, to include standard pollution control measures to protect retained habitats during construction.

4.7. Approximately 180 m of hedgerow and three category C trees and one category U tree will require removal, primarily for access, as detailed on the Arboricultural Impact Assessment **13539/R01f.** The loss of habitats of local ecological importance is therefore minimised. To mitigate and restore these lost habitats on-site, additional tree and hedgerow planting has been incorporated into the proposed masterplan, to be included in a LEMP to ensure their longevity on-site.

4.8. The masterplan also ensures the retained and restored habitats maintain their connection to the wider landscape through green corridors within the site, allowing them to retain functionality and resilience as habitats in their own right and to the fauna which uses them. The green corridors on-site include the hedgerows through and surrounding the Site, the retained badger setts, the woodland copse and pond, the sports pitches (especially those connecting the woodland copse and badger Sett 2), the SUDS area in the east of the Site, A 20 m sewer easement running through the centre of the site which will include ecologically sensitive planting. These areas are to be maintained as dark areas during and post construction so fauna are not dissuaded from using them.

4.9. The retained habitats will also be enhanced, for example through additional woodland planting adjacent to the retained woodland copse to increase cover of the habitat on-site. This enhancement will assist with creating a biodiversity net benefit on-site.

4.10. Beyond the retention, protection and enhancement of existing ecological features within the site, the masterplan also seeks to create better habitats then are currently present on-site, effectively providing a biodiversity net benefit to flora and fauna on-site. Widespread tree, scrub and shrub planting is proposed, along with strategically located habitat provision. This includes an area of neutral grassland surrounding the SUDs features in the site, with the SUDs designed sensitively for ecology. A 20 m sewer easement running through the centre of the site will also be planted for ecology, through the inclusion of neutral grassland and scrub/tree planting. The 30 m buffers surrounding the badger setts could also enhanced through sensitive planting under the supervision of an ecologist. These proposed features offer net benefits for a range of flora and fauna and provide 'stepping stones' through the site to ensure habitats remain connected.

4.11. Overall, it is considered that with the implementation of the masterplan as presented, the development has the ability to deliver a net benefit for biodiversity through the retention and enhancement of existing green infrastructure and creation of new habitat to provide strengthened connections to the wider landscape, thus delivering a more resilient and connected environment whilst abiding by the step-wise approach.

Section 5: Conclusions

Statutory Sites

5.1. A total of 4 statutory and 3 non-statutory nature conservation sites were noted within the Zone of Influence around the Proposed Development, the closest of which being Cefn Park LWS located approximately 830 m south-east of the Site. Any potential construction phase impacts on the designated sites could be mitigated for through the production and implementation of a CEMP for the Site.

5.2. Potential effects on sensitive acid bog habitat occurring at Borras Bog LWS located approximately 1 km to the north of the Site, potentially arising from a possible increase the deposition of airborne sources of nitrogen N0x have been assessed as likely being negligible. This is a result of the existing impact of the neighbouring A5156. However, this cannot be confirmed as it has not been specifically assessed to date.

Habitats

5.3. None of the habitats within the Site were considered to be of greater than local ecological importance, of these hedgerows, ponds and broadleaved woodland are considered to be habitats of conservation concern under national or local biodiversity action. The pond, woodland and majority of the hedgerows, as well as the majority of the scattered trees will be retained through development. The development will primarily affect habitats of negligible ecological importance.

5.4. The majority of habitat loss relates to arable land of negligible ecological importance, with some smaller scale losses of hedgerow sections and boundary trees for access. Habitat losses are to be mitigated through the creation of new habitats which will be included within the landscape design of the development. Retained habitat features would be protected during the construction phase through implementation of a CEMP, which will identify buffer zones for the protection of habitats, and well as pollution prevention measures.

5.5. Both retained and newly created habitats would be the subject of a LEMP which will ensure habitats are managed and protected from incidental disturbance and habitat degradation due to lack of maintenance during operation of the Proposed Development.

5.6. The application of the masterplan will deliver a net benefit for biodiversity and provide strengthened connections to the wider landscape. This is through the general retention of habitats of local ecological importance, the protection of these retained habitats through development via a CEMP and AIA, the replacement of any habitats of local importance to be lost (a small number of trees and hedgerows), the enhancement of retained areas of habitat, and the creation of better habitats then are currently present on-site (neutral grassland) in strategically located positions. Thus, delivering a more resilient and connected environment, whilst abiding by the step-wise approach, which is in line with recently adopted national policy (Chapter 6 PPW) and is detailed in the Green Infrastructure Statement included within this report.

Protected and Notable Species

5.7. Potential effects relating to protected/notable species from development of the Site comprise:

- Loss of terrestrial habitat and dispersal opportunities for GCN and other amphibians, further details of mitigation for habitat loss and to avoid killing / injury of GCN during the construction phase will need be provided and covered by an application for an EPS licence from NRW;

- Potential disturbance to commuting / foraging routes for bats would be mitigated through provision of new hedges which will link to other features such as woodland and hedges beyond the Site boundary, as well as ecologically sensitive planting provided around the SUDS in the south and east and along the 20 m sewer easement running through the centre of the Site, to be kept as dark areas to promote their use by foraging and commuting bats. A series of bat boxes on retained trees will also be provided, together with a sensitive lighting strategy to maintain dark corridors with and surrounding the Site, improving habitat resources for bats locally. No loss of roost locations is predicted;

- The provision of green infrastructure will maintain habitat resources for birds consisting of common woodland passerine species. Loss of potential nesting resources for lapwing arising as a result in the loss of arable land is not deemed to be significant, with further suitable habitat provided in the surrounding area;

- Recommendations for badger can be found within confidential Badger Survey report **13539 R07**;

- During operation of the Proposed Development, implementation of the LEMP will ensure habitats for protected species are maintained; and

- Measures to prevent damage / disturbance to breeding birds, hedgehog and brown hare would also be set out in the CEMP.

Appendix 1: Proposed Site Plan

TTE_UD_v2



Aerial image: © Google Earth 2022

TETRA TECH

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KEY

- Site boundary
- KSS2 boundary
- Proposed residential parcel
- Proposed sports pitches
- Proposed public open space
- Retained tree / hedgerow
- Proposed planting
- Indicative proposed SuDS
- Wildlife corridor
- Proposed primary access
- Proposed secondary access
- Proposed spine road with green verge*
- Proposed road network
- Road feature / traffic calming
- Placemaking / gateway feature
- Existing / potential play space
- Pedestrian / cycle link
- Retained Public Right of Way (PRoW)
- Retained / proposed pedestrian / cycle route
- Existing cycle route

Position of link to remaining KSS2 to be determined

Document control

P06	Updated masterplan to reflect drainage strat and T.constraints	25.11.24	EI	AC	AC
P05	Updated masterplan to reflect new drainage strat	12.11.24	EI	AC	AC
P04	Red boundary update	12.03.24	LR	BR	AC
P03	Updated parcels	27.02.24	BR	BR	AC
P02	Updated masterplan based on technical updates	02.02.24	BR	AC	AC
Rev	Description	Date	Dwn	Chk	App

Erlas Park Wrexham
Harworth Group

STRATEGIC MASTERPLAN

TTE Proj No	Drwn | Date	Checked | Date	Appr'd | Date	Scale @ A3	Suitability
B024030	EI | Nov '24	AC | Nov '24	AC | Nov '24	1:5,000	S0

Client Proj No	Originator	Vol/System	Level/Location	Type/Code	Role	Number	Revision
-	TTE	00	XX	DR	UD	40	P06

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