



Proposed Storage & Distribution Unit

**Bridge Road North, Wrexham
Industrial Estate**

GCN Mitigation Strategy

Produced for:



September 2024

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Prepared by: Russell Grey
Date: 12th September 2024
Version: 1.0

1 INTRODUCTION

1.1 The Scheme

- 1.1.1 Etive Ecology was commissioned by Caulmert Ltd to prepare a Great Crested Newt (GCN) Mitigation Strategy for a plot of land off Bridge Road North, Wrexham, LL13 9XQ. The application site is centred on National Grid Reference SJ 38293 49917.
- 1.1.2 The site has previously been subject to a Preliminary Ecological Appraisal (Etive Ecology Ltd, June 2023) and bat detector surveys. An application for planning permission to develop the site for a storage and distribution unit with associated infrastructure was submitted in June 2023 (P/2023/0446). Following feedback from the Wrexham County Ecologist, further information relating to scheme design and GCN was deemed necessary in order to further inform the application.
- 1.1.3 This report provides the existing data relating to GCN in close proximity to the site, as well as the proposed strategy to mitigate the likely impacts on GCN and to deliver long-term site security for the species.

1.2 Scope of this Report

- 1.2.1 This report builds on the baseline information already provided in the PEA Report. The scope of further surveys has been specified by the Wrexham County Ecologist following a conversation on 31st October 2023. Wrexham's ecologist indicated that the site is located within an area known to support a significant meta-population of GCN.
- 1.2.2 The report provides a summary of the status of GCN on and adjacent to the Site, based on the guidance found in the Great Crested Newt Mitigation Guidelines (English Nature, 2001) and LPG:29 provided by Wrexham Council (August 2009).
- 1.2.3 An impact assessment is provided in **Section 3**, identifying the likely impacts posed to GCN by the scheme and the magnitude of these impacts. Details of the proposed scheme are presented, and key risk areas and activities are identified.
- 1.2.4 **Section 4** presents the GCN mitigation strategy. The mitigation measures proposed follow the GCN Mitigation Guidelines and aim to avoid any harm to GCN, to minimise disturbance to GCN and to ensure there is no long-term impact on the Favourable Conservation Status (FCS) of the species as a result of the proposed scheme.
- 1.2.5 A short section on the 'three tests' is provided in **Section 5**. This provides a summary of the key issues which is given to assist the LPA in determining whether the scheme satisfactorily passes these tests.
- 1.2.6 The findings of these surveys have been used to feed into the proposed layout for the development of the site. According to Chapter 6 of Planning Policy Wales, a 'step-wise' approach to development must be taken to ensure that biodiversity is considered throughout the design process. The mitigation hierarchy is to avoid, minimise, mitigate and compensate impacts. A revised site layout is provided in **Appendix A** of this report.

2 GCN STATUS

2.1 Extended Phase 1 Habitat Survey

- 2.1.1 An Extended Phase 1 Habitat Survey was undertaken by Russell Grey (MCIEEM, CEnv, BSc) of Etive Ecology Ltd in February 2022 and was repeated in June 2024. The survey method follows the habitat assessment and classification procedure outlined by the Handbook for Phase 1 Habitat Survey (JNCC, 2010), whereby all habitats are identified, described and mapped using a standard classification. The 2024 survey comprised a more detailed assessment of the grassland but also updated the whole site baseline.
- 2.1.2 The survey established that no ponds were present within the site boundary, one pond within 250m and a further five ponds <500m of the red-line boundary. All of the habitat present within the site boundary is potentially suitable terrestrial habitat for GCN. This includes an extensive area of grassland (areas) with scattered scrub and trees encroaching through an absence of management. There is limited connectivity to the south due to the existing industrial units and Bridge Rd North, but to the north, east and west there are good habitat links for GCN and more general amphibian dispersal. Records provided by Cofnod also confirmed the presence of GCN within the Wrexham Industrial Estate (WIE), as discussed in Section 2.3 below. The full PEA Report is included within the planning application documents.
- 2.1.3 It is concluded that GCN are likely present within the development footprint.

2.2 HSI & eDNA Surveys

- 2.2.1 Of the six ponds located <500m of the site, only the one immediately adjacent to the west could be accessed sufficiently to undertake a Habitat Suitability Index (HSI - Oldham et al., 2000) assessment. The pond is ~200m², never dries, <60% shade, good water quality and ~30% macrophyte cover. The HSI score was calculated to be 0.85, which is described as being of excellent suitability for GCN.
- 2.2.2 Using aerial imagery of the other five ponds, each appears to have characteristics that would reduce the overall HSI score. Ponds within Erilas Black Wood suffer from excessive shading and most likely this would affect the coverage of macrophytes and water quality. The pond beside Redwither Tower appears to be an ornamental pond and is also well shaded and would have the potential to support fish and waterfowl. The pond to the south of Ash Road South also appears to be heavily shaded. As a result, the HSI scores for these ponds would be expected to conclude Good or Average suitability ponds for GCN.
- 2.2.3 An eDNA sample was taken from the immediately adjacent pond in July 2021. Analysis of this sample returned a negative result, indicating that GCN were not present within the pond for up to 6 weeks prior to the sample date.

2.3 Existing GCN Data

- 2.3.1 As part of the PEA, a data search was undertaken by Cofnod in 2022. Cofnod provided >50 records of GCN, 2 records of Palmate newt, 22 smooth newt, 13 records of common frog and 8 records of common toad within 0 – 1km of the site between 1992 – 2021. The closest record of GCN was recorded in 2021, ~300m to the southwest of the application site.

- 2.3.2 A second round of data was purchased from Cofnod in October 2023, following discussions with the Wrexham County Ecologist. It was advised that GCN population monitoring surveys were being undertaken for the pond immediately adjacent to the site and that this data would be available from Cofnod. Cofnod returned no GCN records for the period 2017-2020, during which time 21 negative GCN results were submitted for this pond. Only smooth newt were recorded in the pond during this period.
- 2.3.3 The licensed ecologist undertaking the GCN surveys on the adjacent pond has been identified and contacted for clarification of the GCN data. Attempts were made to obtain this data in October 2023 and September 2024, but on each occasion the data was not made available.

2.4 GCN Status Summary

- 2.4.1 Based on the findings of the Extended Phase 1 Habitat survey of the site, the HSI and eDNA assessment of ponds within 500m, as well as consideration of the existing GCN records for the area, it is concluded that GCN are likely to be present within the immediate vicinity of the site. Given the information that has been gathered, and considering previous discussions with NRW's Senior Species Advisor, it is acknowledged that the local GCN population forms part of the Wrexham Industrial Estate (WIE) meta-population. This large meta-population is of National importance but is known to be in an unfavourable condition.
- 2.4.2 A precautionary approach has therefore been proposed with regards to mitigating the potential impacts on GCN, given the National importance of the WIE GCN population. The GCN population likely to be affected by the scheme is therefore taken to be of a medium-size, with appropriate mitigation and compensation provided accordingly.

3 GCN IMPACT ASSESSMENT

3.1 Proposed Scheme

- 3.1.1 The proposed development is illustrated on Figure 5a. This revised layout has been designed following the survey results reported herein. The design takes into account the following ecological considerations:
- The Strategic Ecological Network identified in the Wrexham LDP.
 - The prevalence of spiny retharrow in the eastern portion of the site.
 - The distribution of butterfly encounters around eastern, northern and western edges, with few in the centre of the site.
 - The likely presence of GCN within ponds <500m of the site.
- 3.1.2 The proposed layout also considers the practical requirements of the end-user post-development. Factors such as access, drainage, parking, the size of the yard, turning circles and the size of the warehouse facility itself. The proposed development is considered to be appropriate and proportionate for a variety of storage and distribution users.
- 3.1.3 Figure 3 shows the existing Site layout pre-development and highlights the anticipated impacts without mitigation, as described below. Figure 4 shows the proposed mitigation measures required to ensure there is no direct harm posed to GCN during the construction phase of the scheme. Figure 5b shows the footprint of the development and retained areas of habitat to be delivered as part of the scheme (detailed in Section 4).

3.2 Short-term Impacts - Disturbance

- 3.2.1 Without mitigation, the construction of the scheme will result in immediate disturbance to the existing semi-natural habitats on Site, comprising grassland, ruderals, scrub and scattered trees. Any GCN present within these habitats will also be subject to disturbance and likely harm. These impacts would be significant at the local level given the assumed presence of GCN within the Site.
- 3.2.2 During the construction phase (c 26 weeks) there is a risk that GCN could be present on Site and therefore could be disturbed, injured or killed.

3.3 Long-term Impacts – Site Modification

- 3.3.1 The proposed scheme will include the retention of ~55% of the existing grassland habitat on site. The long-term management of this grassland has been designed into the proposed scheme, in order to retain and enhance habitat for butterflies and to achieve Net Benefit for Biodiversity. This grassland retention, enhancement and long-term management will ensure that the site is managed more appropriately for GCN, as well as other species of wildlife. Therefore, the long-term impact of Site modification will be neutral to GCN as there will be a smaller area of grassland of a higher quality/suitability than the existing area of grassland.

3.4 Long-term Impacts – Site Loss

- 3.4.1 The proposed development will result in the permanent loss of ~6000m² of grassland habitat to the footprint of the proposed unit and associated infrastructure.

3.5 Long-term Impacts – Fragmentation and Isolation

- 3.5.1 There should be no temporary fragmentation during construction as the retained grassland is to be retained and protected from the start of development works. Long-term no significant fragmentation impacts are anticipated due to the retention of suitable terrestrial habitat around the northern and eastern areas of the development footprint. These retained areas of habitat have been aligned to match, enhance and extend the Strategic Ecological Network identified within the Wrexham LDP.

3.6 Post Development Interference Impacts

- 3.6.1 Post-construction, there is a risk that surface water drainage systems could pose a risk of harm to GCN that might disperse into developed areas of the site. There may also be a minor risk of disturbance or harm as a result of routine maintenance to retained habitats or from pedestrian trampling impacts. However, maintenance tasks would normally be carried out over the winter period to avoid nesting bird impacts and would be undertaken by suitably experienced contractors. It is also anticipated that the retained habitats are fenced off from pedestrian access, to manage the risk of disturbance from trampling. The impact of any post-development interference is therefore considered to be negligible.

4 GCN MITIGATION STRATEGY

4.1 Capture and Exclusion

- 4.1.1 The GCN mitigation strategy is based upon the goal of excluding all GCN from the construction zone prior to the commencement of works. To achieve this, a line of vertical GCN exclusion fencing will be installed, according to best practise standards, around the working area as shown on Figure 4. Alternate pitfall traps and refugia will be installed every 10m along the inside of the fence line and will be used to capture GCN, and any other amphibian species, for a period of up to 60 consecutive days. Artificial refugia (carpet tiles or similar) will be laid in between pitfall traps and checked daily to improve trapping efficiency. Given the relatively small number of GCN that are likely to be found within the trapping area, it is proposed that a minimum of 30 days will be trapped. Only when no GCN are caught for a minimum of 5 consecutive days will the trapping cease and the area will be deemed clear of GCN. Newt grids will be installed where Site access roads cross perimeter fencing areas. Retained grassland will be protected with barrier fencing from the start of the construction phase to ensure continued use by GCN and other amphibians.
- 4.1.2 Once the construction zone has been cleared of GCN the exclusion fence will remain in situ for the duration of construction works.
- 4.1.3 All industry standard GCN trapping protocols as described in the GCN Mitigation Guidelines will be fully adhered to. These include the checking of traps by GCN licenced ecologists or accredited agents, trapping only during suitable weather conditions and ensuring that the traps are set-up to provide shelter for amphibians and a means of egress for small mammals.

4.2 Receptor Site

- 4.2.1 All amphibians caught during the trapping effort will be translocated into suitably dense vegetation around the margins of the retained area of grassland, as close as reasonably possible to the point of capture. The GCN exclusion fencing will prevent returns to the Site until all construction works have been completed.

4.3 Enhancements, Monitoring, Management and Maintenance

- 4.3.1 Figure 5b illustrates the proposed enhancement, management and monitoring measures associated with the scheme. These include:
- Retention of ~7300m² of the existing grassland.
 - Improved linkage across the site and the wider WIE through the enhancement and extension of the existing Strategic Ecological Network that extends into part of the application site boundary.
 - Planting of 12no. native trees.
 - Creation of 4 x hibernacula as per the GCN Mitigation Guideline specification.
 - Long-term management of these retained and newly created habitats and features.
- 4.3.2 The retained grassland habitat, with the exception of the small section of mown grassland adjacent to Bridge Road North which is managed by regular mowing to maintain visibility at the site entrance, will be managed for various biodiversity interests including GCN to provide a diverse structure and sward composition. The grassland will be managed by a single annual cut and targeted scrub/tree management. The aim is to manage the grassland to a sward

height of not less 150mm during the spring and summer periods, before allowing it to re-grow again towards the early autumn, so that it offers excellent over-wintering habitat and connectivity.

- 4.3.3 The retained and newly created habitats within the Site will be subject to a Habitat Management Plan (HMP) for 25 years. A HMP will be prepared and submitted with the GCN License application and will include annual maintenance and management of the grassland, the new hibernaculum and the areas of tree planting. Management of these habitats and features is targeted at creating high quality foraging, dispersal and sheltering opportunities for GCN and other amphibians.
- 4.3.4 As part of the licencing requirements, there will be a schedule of monitoring to assess the efficacy of habitat enhancement and management works. In accordance with NRW's requirements, monitoring will extend for the 25-year duration of the HMP, as described below.

Long Term Habitat Management

- 4.3.5 A long-term Habitat Management Plan (HMP) will be prepared and implemented for the site. This will commence immediately upon commencement of development activities. Details of the HMP should be secured by way of a suitably worded planning condition but would include the following outline measures:
- A mix of scattered native trees will be planted along the northern and western boundaries, comprising oak, silver birch and alder. Trees will be managed by way of an annual inspection and undertaking of any necessary works to retain good tree health, growth and form.
 - Annual management of scrub through strimming outside of the nesting bird season. Strimming should aim to maintain bramble and other scrub to not more than 10% of the grassland area. The retained 10% should be rotated so that there is an age range to scrub vegetation.
 - The grassland will be cut annually in August to a sward height of 150mm. All cuttings will be collected and removed from the site.
 - A permanent fence (timber post and rail) will be installed around the edge of the grassland to deter impacts from trampling or littering of the habitat during the operational life of the development. Fencing will be maintained as required.
 - There will be an annual litter pick of the retained grassland, undertaken by the ecological contractor.
 - Four hibernacula will be created on site to provide suitable sheltering and over-wintering opportunities for amphibians.
 - All of these features will be subject to ecological monitoring, in Years 1, 2, 3, 5, 10, 15 and 25 post-development.
 - The GCN license will be linked to the ownership of the site. In the event of the site being sold, the license would be transferred to the new owner. The licensee will be solely responsible for the implementation of the GCN License requirements, including habitat management, monitoring and maintenance.
- 4.3.6 Monitoring of the site will be undertaken in Years 1, 2, 3, 5, 10 and every five years thereafter, by a suitably experienced ecologist. A monitoring report will be issued to Wrexham County Ecologist, using a format to be specified within the HMP.

- 4.3.7 Monitoring will assess the grassland habitat (extent, condition, species-richness, etc), the presence of spiny retharrow and the butterfly population on site. If required, terrestrial habitat searches could also be carried out to determine GCN presence and usage of the site. However, as the ecological monitoring will comprise just a single visit, access will be made available upon request for further ecological monitoring visits if approved or instructed by Wrexham County Ecologist.
- 4.3.9 Provided the measures described above are implemented in full it is considered that no off-site provision of habitat for GCN is required. This is because the long-term protection, retention and conservation management of 55% of the existing grassland habitat is deemed to deliver a genuine benefit for the Favourable Conservation Status of GCN on site and at the local scale. The habitat on site is not secured by any management agreement and is allocated within the LDP for development. Therefore this proposal will secure the long-term future of this habitat for GCN and will improve its condition and overall value to GCN as a result of appropriate management and monitoring.

4.4 Timing of Works

- 4.4.1 Table 4.4.1 below gives an indication of the likely programme of works for the GCN mitigation, construction and post-development monitoring.

Table 4.4.1 Outline Programme of Works

Year	Activity	Responsibility
Year 1	Apply for GCN License from NRW	GCN-licensed ecologist.
	Installation of GCN fencing and pitfall traps on Site, including creation of newt friendly vehicle access point with newt grids. Commencement of management of retained habitat.	Suitably experienced GCN fencing contractor.
	Minimum of 30 days pitfall trapping. GCN License Report submitted to NRW.	GCN-licensed ecologist.
	Construction Phase. Habitat creation and landscaping within GCN fencing.	Principal Contractor. Suitable landscape contractor.
Year 2	Removal of GCN fencing under ecological supervision.	Suitably experienced GCN fencing contractor.
	GCN License Report submitted to NRW.	GCN-licensed ecologist.
Year 3	GCN Monitoring Surveys	GCN-licensed ecologist.
	Terrestrial Habitat monitoring	GCN-licensed ecologist.
	GCN Licence Report submitted to NRW.	GCN-licensed ecologist.

5 THE “THREE TESTS”

5.1 The NEED

- 5.1.1 The Wrexham Local Development Plan (LDP) was adopted in December 2023 and provides up to date guidance on development within the Local Authority area.

- 5.1.2 LDP Policy SP8 acknowledges that Wrexham is a key economic driver in North Wales and the wider region and the Policy seeks to promote economic growth and employment opportunities on Employment Areas, whilst, at the same time, safeguarding the Strategic Ecological Network (SEN).
- 5.1.3 LDP Policy SP9 confirms that Wrexham Industrial Estate is the County Borough's Key Business Sector Area and will be the primary focus for new employment development over the plan period for class B1, B2 and B8 employment and that land is also protected on the Estate for a Strategic Ecological Network for a number of local, national and internationally protected species and habitat.
- 5.1.4 The proposed built development is located entirely on that part of the application site which is allocated as an Employment Area on the LDP Proposals Map Inset 3. No built development whatsoever is proposed on that part of the application site which is allocated as part of the Strategic Ecological Network. Those parts of the allocated Employment Area which are not proposed for built development, together with the allocated Strategic Ecological Network within the application site, will be managed to provide on-site ecological mitigation and enhancement.
- 5.1.5 The proposed development accords with the provisions of the up to date Wrexham LDP by facilitating B8 economic development in the Council's Key Business Sector Area, whilst at the same time protecting the Strategic Ecological Network and providing on-site ecological mitigation and enhancement.

5.2 No SUITABLE ALTERNATIVE

- 5.2.1 As indicated above, the Wrexham LDP confirms that Wrexham Industrial Estate is the County Borough's Key Business Sector Area and will be the primary focus for new employment development. In addition, the LDP acknowledges that large parts of the Industrial Estate are protected for a range of local, national and internationally protected species and habitat. Thus, all development on allocated employment land within the Industrial Estate, such as that now proposed at Bridge Road North, must seek to balance the need for essential economic development and the protection of species and habitats. The proposed development achieves this balance, in an appropriate manner, and proposals for built development on other employment land within the Industrial Estate will be required equally to address this challenge.
- 5.2.2 The "Do Nothing" scenario would pose no adverse impacts to GCN but would make no contribution to meeting the NEED for the creation of additional storage/distribution units within an existing industrial setting allocated for this type of development.

5.3 No Impact on FAVOURABLE CONSERVATION STATUS (FCS)

- 5.3.1 The proposed development has been identified as posing a potential risk of disturbing, injuring and killing GCN during construction and operational activities. However, as a result of the mitigation and compensation measures proposed herein, all GCN will be removed from the working area, thereby avoiding harm during the construction phase. Existing habitat will be retained, protected and created including grassland, four hibernacula and scattered trees/scrub. These habitats will be managed in such a way that they will provide habitat of enhanced suitability for GCN and will be managed for the benefit of GCN and other wildlife.

- 5.3.2 These measures will ensure that there will be no loss of functionality for GCN post-development and will ensure no significant long-term impacts on the GCN population at the Site, Local or County level. The proposed monitoring should demonstrate this strategy to be successful in ensuring no medium to long-term impacts on the species. As a result of these measures there should be an improvement in the Favourable Conservation Status (FCS) of the local GCN population.

Appendix A - Figures

Figure 1; Aerial Image of Site Boundary

Figure 2; Ponds <500m

Figure 3; GCN Impacts

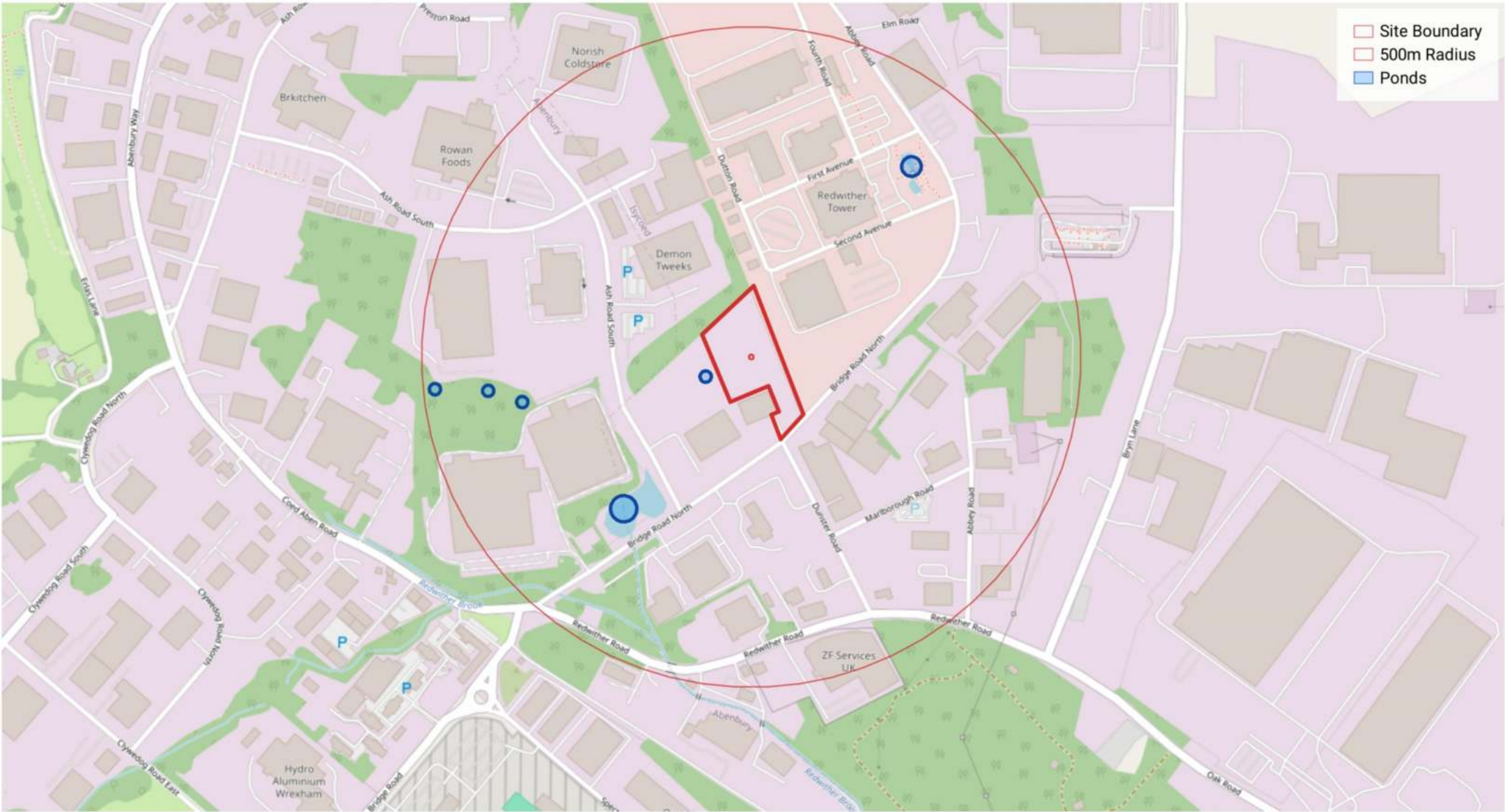
Figure 4; GCN Mitigation Strategy

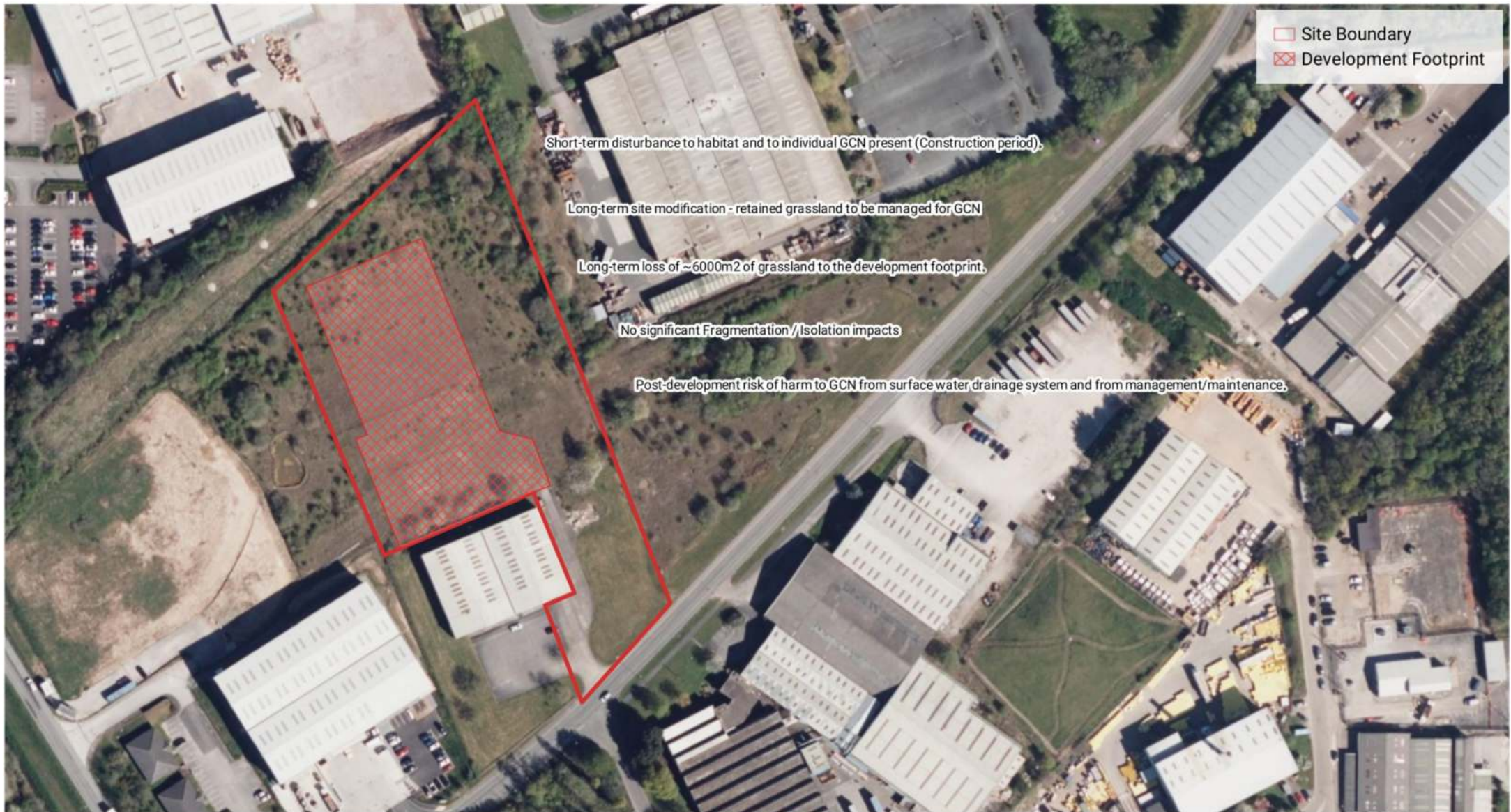
Figure 5a; Proposed Development Layout

Figure 5b; Proposed Habitat Layout

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1

PROPOSED SITE PLAN

1 : 500

ECOLOGICAL MITIGATION

Gross Site Area	15,000m2
Area of Mitigation (shown green)	7,340 (49% of application area)
Developed Area	7,660m2 (51% of application area)
Building Footprint	3,393m2
Hardstanding	4,267m2

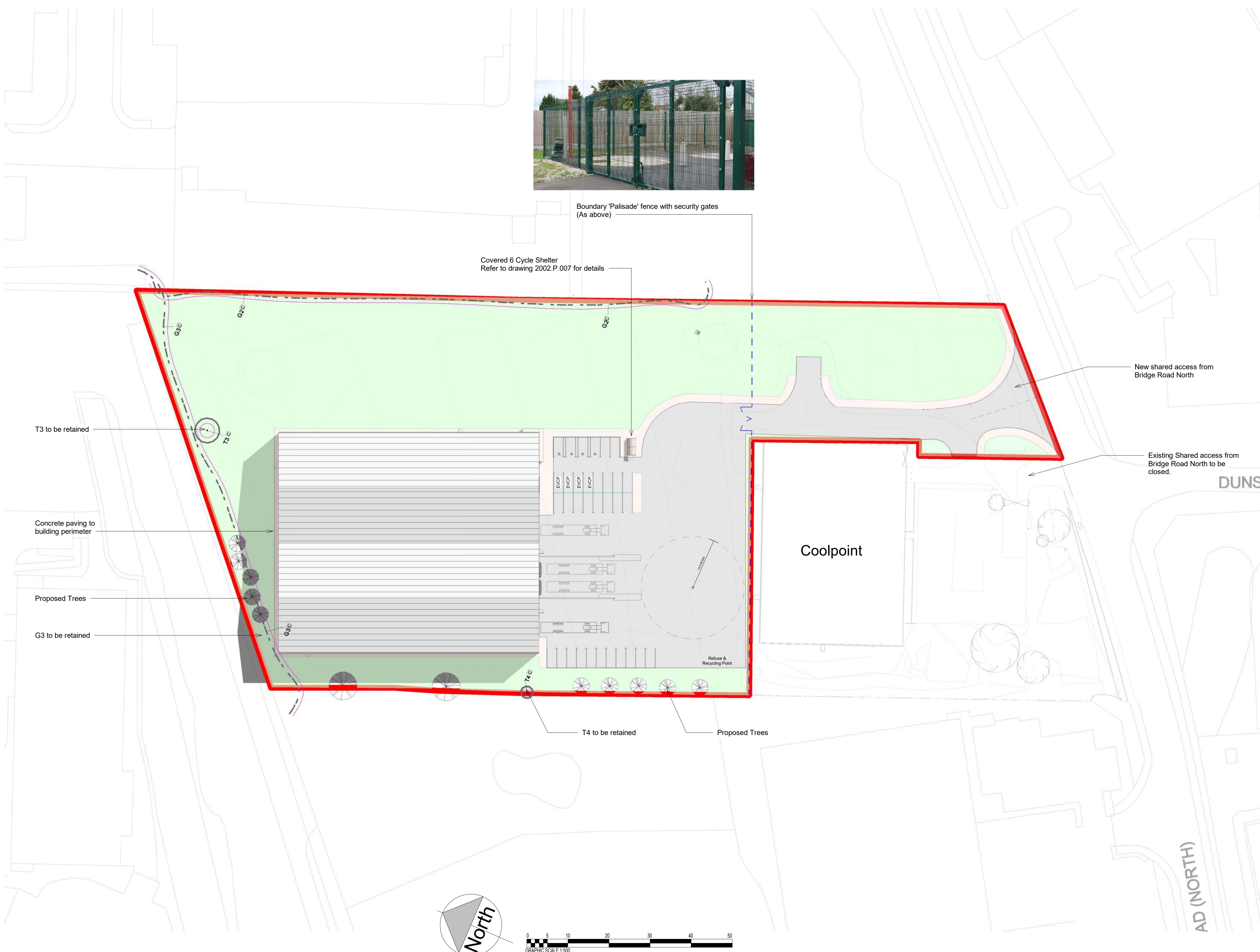
PARKING PROVISION

Gross Internal Area	3,275m2
Parking Provisions	33 Total spaces (average 1/100m2)
Car Parking Bays	4 spaces (10% of Provision)
Disabled Bays	6 sheltered spaces
Cycles	

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BS 5266 (2016) - Emergency Lighting - Code of practice for the emergency lighting of premises
BS 5499 (2014) - Guidance for the selection and use of safety signs and fire safety notices



REVISION	DETAILS	DATE
A	Reduced to single unit	Jan 2023
B	Reduced footprint - ecological corridor	Aug 2024



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PURPOSE OF ISSUE
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PROJECT
Proposed Storage & Distribution Unit

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PROPOSED SITE PLAN

CLIENT
JCP Investments Ltd

DRAWN BY
nc

CHECKED BY
HJ

DATE
27.04.23

SCALE (@ A1)
1 : 500

PROJECT NUMBER
2002

DRAWING NUMBER
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B

