
IPSEN EAST, ASH ROAD NORTH, WREXHAM INDUSTRIAL ESTATE

GCN METHOD STATEMENT

1.1 Introduction

IPSEN are proposing the construction of a manufacturing facility and associated car parking and landscaping at the Ipsen East Site, Ash Road North, Wrexham Industrial Estate (WIE) (P/2023/0482). WIE is ecologically sensitive due to the presence of a significant population of great crested newts (GCN). The applicant is anticipating a planning condition that states:

“No development shall commence until a Great Crested Newts Method Statement has been submitted to and approved in writing by the Local Planning Authority. The Method Statement should include, but not necessarily be limited to:

- Submission of great crested newt avoidance and mitigation measures, building upon the principles outlines in Section 4 of the ecological report (Great Crested Newt Survey report (GCN Survey Report for Ipsen East, Ash Road, Wrexham Industrial Estate by Etive Ecology Ltd, dated October 2023). The details to include identify Reasonable Avoidance Measures (RAMS) such as barrier fencing; and measures to be carried out that ensure working areas are clear of GCN prior to the commencement of construction and related works.”*

This document presents a scheme of Reasonable Avoidance Measures (RAMs) for GCN, aimed to prevent harm or disturbance to any individual GCN during the construction of the proposed scheme.

This document will be appended to the contractors Construction Method Statement for use on site.

1.2 GCN Method Statement

The footprint of the proposed building is set within a plot of land currently comprising a hard-standing car park and areas of crushed hard-core and rubble from the demolition of a previous building on site in 2019. A temporary prefabricated building was constructed on part of the site earlier this year (P/2023/0482). The site was described within a Preliminary Ecological Appraisal (PEA) Report¹ as having no ecological value, although it does have the potential for GCN and other herpetofauna to be present on site, due to the presence of GCN on WIE and known records <250m to the east. The closest semi-natural habitat is located adjacent to the southeast of the site; Erlas Black Wood.

Work on the recent construction of the temporary prefabricated building involved the relocation of stockpiles from the southeast corner of the site. As part of the consent associated with the development, a scheme of GCN RAMs was conditioned. An agreement was made with Wrexham’s County Ecologist detailing including a two-week period of temporary GCN fencing and refugia checks of the stockpiles – as the most likely habitat to support GCN. No GCN or any other species of amphibian were recorded

¹ Cambrian Ecology Ltd, 2023

during the survey effort, therefore the risk of encountering GCN within the lower value 'habitat' within the development footprint is assessed to be very low. A copy of the consented RAMs for the temporary building, as well as a copy of the survey findings report, are appended to this GCN Method Statement as supporting information. In effect, **the implementation of the previously agreed set of RAMs has established that GCN are likely absent from the current red line application site boundary.**

The proposed scheme comprises the construction of a new manufacturing facility with associated car parking and landscaping. The application site extends over ~1.3ha, with the building taking ~0.5ha of land and surrounding hard-standing taking ~0.5ha. The remaining area will be landscaped and used for surface water drainage/management. Construction vehicles and personnel will enter the site through the existing road network and site entrance off Ash Road North in the northwest corner of the site. The construction works will commence as soon as practically possible, with a starting date of January 2024 and will be undertaken over a period of 12-18 months.

Plate 1.2 below shows the proposed development layout.

Due to the presence of GCN locally and the suitable adjacent habitat associated with Erilas Black Wood, a precautionary approach is still required to ensure that no GCN or other species of amphibian are harmed during construction or operational works. The following approach is recommended:

- Permanent GCN barrier fencing is to be installed along the southeast corner of the site to ensure no GCN disperse onto the site during construction works or the operational use of the site. The fencing will comprise a 4mm thick HDPE material, installed along the edge of the new car park. The proposed fence location is indicated on **Plate 1.3 below**. At both ends of the fence will be a short section angled back to return GCN away from the site. The barrier fencing will be installed to industry standard specifications (GCN Mitigation Guidelines, 2001), see **Appendix A**.
- Works will be undertaken following the following scheme of Reasonable Avoidance Measures (RAMs).
- Works can commence at any time, as all potentially suitable GCN habitat has already been removed from site as part of the temporary building consent.
- Works must be undertaken under direct GCN-licensed supervision.
- The GCN fence will be installed at the start of the construction works and will be maintained throughout the construction period.



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Plate 1.2 Proposed Site Layout

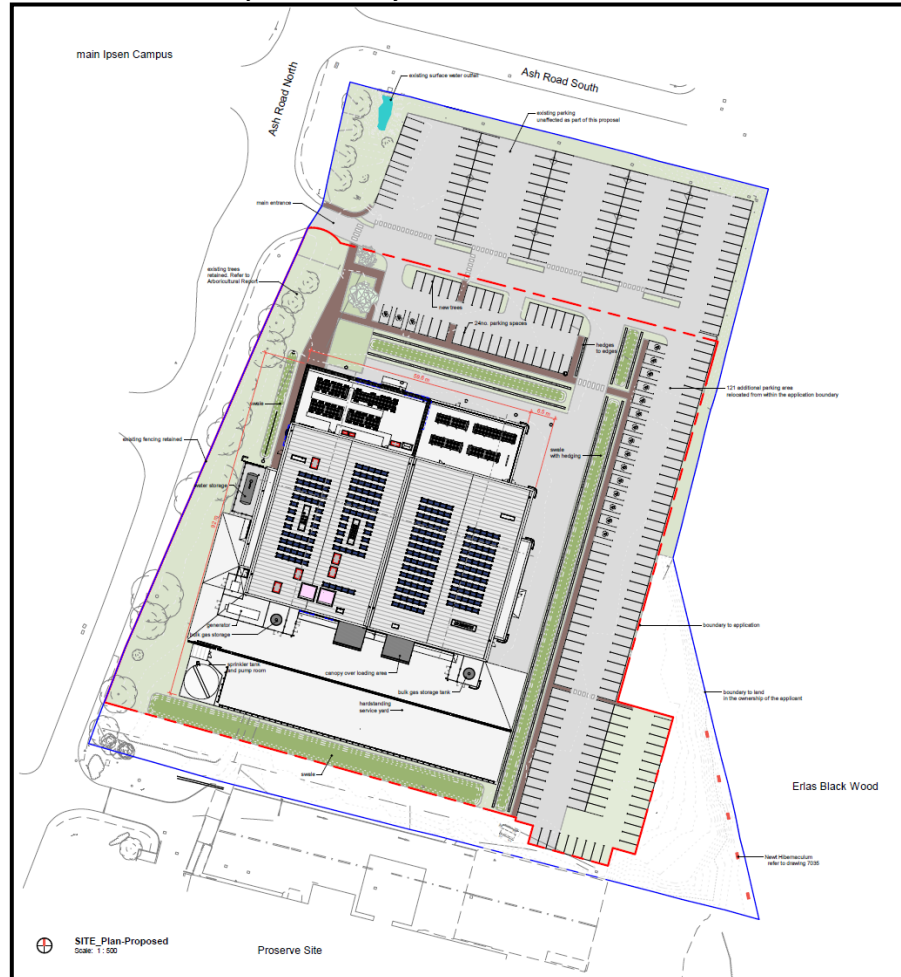
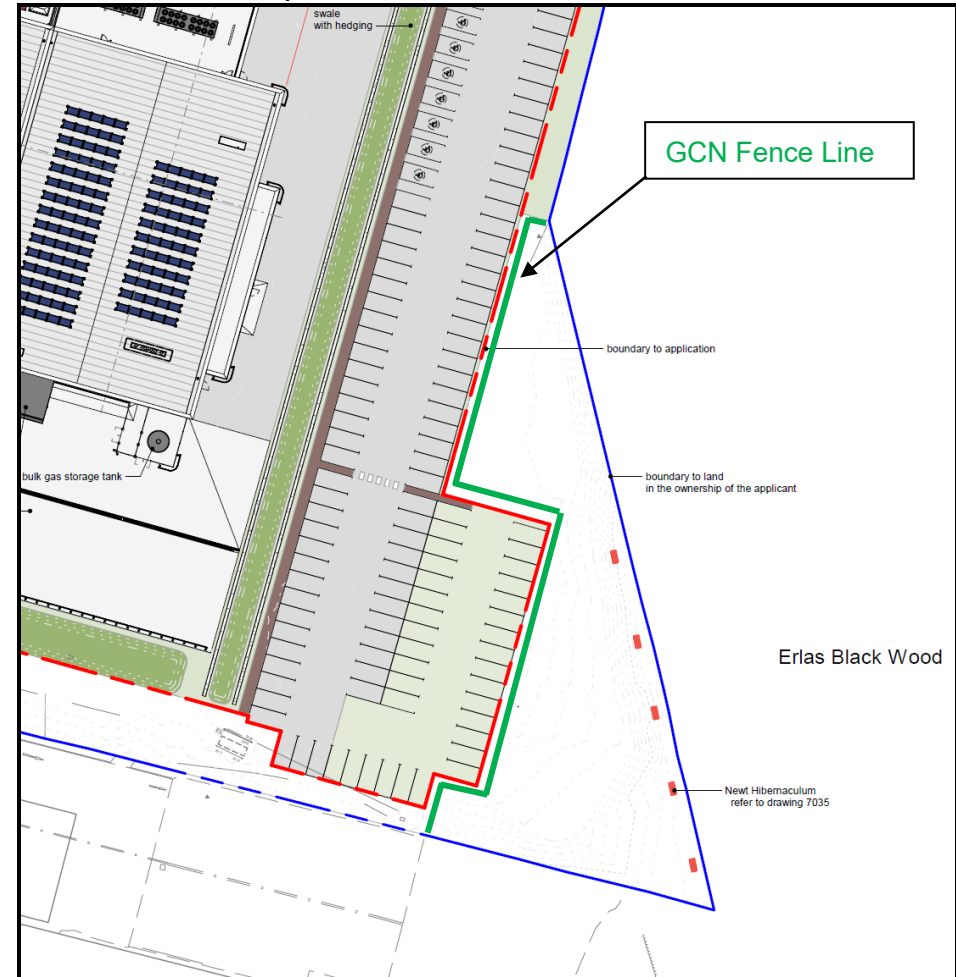


Plate 1.3 Proposed GCN Fence



Scheme of GCN Reasonable Avoidance Measures (RAMs)

The low risk of disturbing or harming GCN during the construction works at the Ipsen East site will be mitigated through the implementation of the following RAMs:

- A pre-commencement Toolbox Talk will be delivered to the site personnel working on the development. This will provide information relation to GCN identification, ecology and legal status, as well as the details and requirements of these RAMs.
- Installation of the Permanent GCN Barrier Fencing as soon as feasibly possible at the start of the construction works, and outside of the hibernation period (November to February inclusive).
- A pre-commencement hand-search of areas due for breaking of ground will be undertaken by a GCN licensed ecologist.
- Clearance of ground vegetation, detritus and any other potentially suitable refugia for GCN (such as at the edges of the site, around mounds, piles of logs, brash, bricks and stones and in rough grassland) will be undertaken prior to any construction works.
- Any clearance works described above will be undertaken with care and by hand by a suitably experienced contractor.
- If any GCN are encountered, works in the area of the discovery should cease immediately and an experienced ecologist called for advice. Erlas Black Wood to the southeast of the site would be a suitable receptor site for any GCN found during the works.
- During construction works;
 - all materials will be stored off-ground on stillages or pallets.
 - all rubble/spoil/earth arising from works will be skipped or removed from site on a daily basis.
 - any excavations left overnight will either be back-filled and compacted or else covered by plastic sheeting and secured by plywood batons (or similar) to prevent GCN from gaining access.
 - pre-start checks of the working area will be undertaken each morning, looking for any GCN.
 - all site workers will be made aware of the potential presence of GCN and an identified sheet will be kept on site in case any of these animals are encountered.

The above RAMs have been designed such that the site can be carefully cleared without harming GCN and that subsequently the site is kept tidy and unsuitable for these species to utilise, so that they do not take refuge within the working area.

Provided this scheme of RAMs is followed in full, the risk of encountering, disturbing or harming GCN is considered to be very low.

It is noted that if any GCN are encountered, then works in the area of the finding will cease until the risk posed to protected species is re-assessed by a suitably experienced ecologist. If the risk posed is considered to be significant, then a license *may* be required in order for works to recommence.

1.3 Timing of Works

The site has already been cleared during the active season under ecological supervision as part of the planning consent for the temporary building (P/2023/0482). The above RAMs are therefore a continuation of the previous set of RAMs and will continue to be implemented throughout the whole year as part of the 'tidy-site' policy.

The removal of all potentially suitable hibernation features means that the likelihood of finding any GCN on site is negligible.

Consideration should also be given to the nesting bird season, which runs from March to August inclusive.

1.4 Roles & Responsibilities

The following roles and responsibilities are defined:

GCN Licensed Ecologist

- Preparing and delivering a pre-commencement Toolbox Talk to all site workers.
- Undertaking pre-commencement hand-searches of the working area.
- Being available on-call to respond to any incidental amphibian finds.
- Recording and reporting all actions taken under this RAMs.

Developer

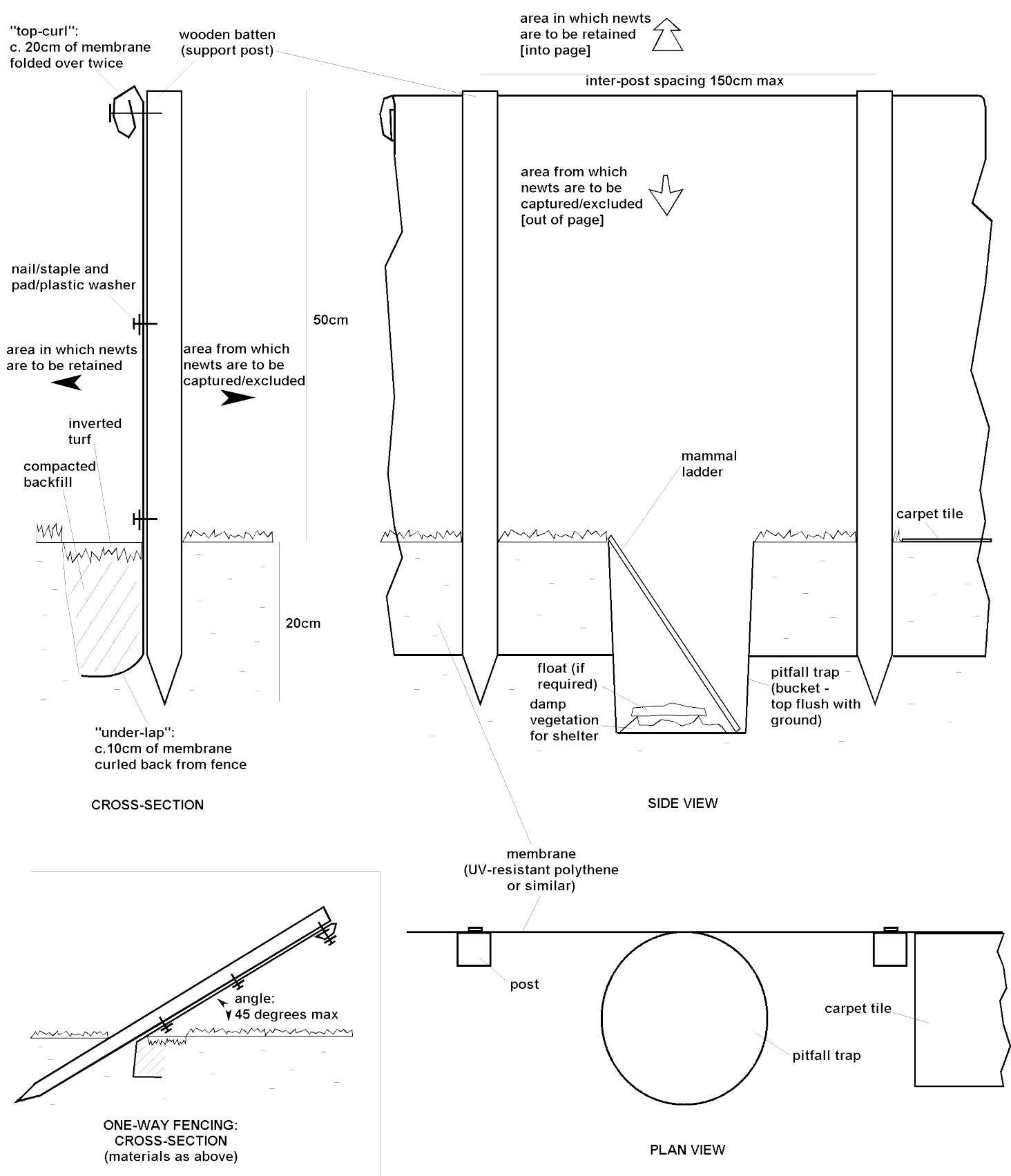
- Appoint a suitably experienced contractor to install the GCN fencing at the start of construction works.
- Marking out the required working area.
- Ensuring all site workers either attend the Toolbox Talk or cascade the Toolbox Talk to them at a later date.
- Record the attendance at Toolbox Talk(s).
- Appoint a suitably experienced contractor to undertake site clearance.
- Ensure that their Principal Contractor and all sub-contractors follows the 'tidy-site' measures described herein.
- To stop works if any amphibians are found.

APPENDIX A

GCN FENCING SPECIFICATION

Figure 4: Fence and pitfall trap design

Recommended design for exclusion fence (temporary amphibian fence), drift fence, and pitfall trap placement. This design can be used for a variety of capture and exclusion/retention purposes (see text and [Figure 5: Common fencing and trapping patterns](#)).



APPENDIX B

GCN METHOD STATEMENT (P/2023/0482)

IPSEN EAST, ASH ROAD NORTH, WREXHAM INDUSTRIAL ESTATE

GCN METHOD STATEMENT

1.1 Introduction

IPSEN are proposing to site a temporary prefabricated building on an area of land adjacent to their existing site off Ash Road North, Wrexham Industrial Estate (WIE). WIE is ecologically sensitive due to the presence of a significant population of great crested newts (GCN). The applicant is anticipating a Planning Condition that states:

“No development shall take place until an Amphibian Reasonable Avoidance Measures scheme has been submitted to and approved in writing by the Local Planning Authority. The Reasonable Avoidance Measures (RAMs) shall include, but not necessarily be limited to:

- further details and associated plans concerning amphibian avoidance and mitigation measures including, but not limited to, one-way amphibian fence design and locations (prior to and throughout the duration of any work).*
- Measures to be taken to prevent or reduce accidental capture or killing of amphibians including installation of permanent amphibian fencing into the boundary fence line.*
- details of timing, phasing and duration of construction activities and conservation measures;*
- a timetable for implementation demonstrating that works are aligned with the proposed phasing of the development; and*
- persons responsible for implementing the works.”*

This document presents a scheme of Reasonable Avoidance Measures (RAMs) for GCN, aimed to prevent harm or disturbance to any individual GCN during the construction of the temporary building.

This document will be submitted to discharge the relevant planning condition and will be implemented in full if approved by Wrexham County Borough Council.

Discussions have taken place with Wrexham’s County Ecologist on behalf of the applicant, and an approach to establishing GCN presence/absence within stockpiles to the southeast of the temporary building has been agreed. This will comprise the installation of a temporary GCN fence, the construction of five new GCN refugia outside of the development footprint, use of artificial refugia to establish GCN presence/absence and then the dismantling of the stockpiles under a separate scheme of RAMs.

1.2 GCN Method Statement

The footprint of the proposed building is set within a plot of land currently comprising a hard-standing car park and a small area of crushed hard-core and rubble from the demolition of the previous building in 2019. The site has been described within a Preliminary Ecological Appraisal (PEA) Report¹ as having the potential to support GCN. The photographs provided below indicate that the potential for GCN is actually very low, given the made-ground that dominates the footprint of the scheme. It is acknowledged

¹ Cambrian Ecology, 2023 (Unpublished).

that there is suitable semi-natural habitat to the east of the site (Erlas Black Wood), but connectivity between that habitat and the development footprint is of low value to GCN, comprised of further rubble and crushed hard-core, thus the risk of encountering GCN is considered to be low.

The proposed building comprises a two-storey prefabricated unit. Shallow foundations will be required, to a depth of not more than 1m.

Construction vehicles and personnel will enter the site through the existing road network and site entrance off Ash Road North. The installation works will commence as soon as practicable and will be undertaken over a period of approximately 1 month.





Given the unsuitability of the site for GCN, there is no requirement for GCN exclusion fencing due to the low likelihood of causing harm / injury to or killing of GCN. However, works should be undertaken following a scheme of Reasonable Avoidance Measures (RAMs). The works must be undertaken during the GCN active period; March to October inclusive, to ensure the protection of GCN.

Scheme of GCN Reasonable Avoidance Measures (RAMs)

The low risk of disturbing or harming GCN during the construction works at the Ipsen East site will be mitigated through the implementation of the following RAMs:

- A pre-commencement Toolbox Talk will be delivered to the site personnel working on the development. This will provide information relation to GCN identification, ecology and legal status, as well as the details and requirements of these RAMs.
- A pre-commencement hand-search of areas due for breaking of ground will be undertaken by a GCN licensed ecologist.
- Clearance of ground vegetation, detritus and any other potentially suitable refugia for GCN (such as at the edges of the site, around mounds, piles of logs, brash, bricks and stones and in rough grassland) will be undertaken prior to any construction works.
- Any clearance works described above will be undertaken with care and by hand by a suitably experienced contractor.
- If any GCN are encountered, works in the area of the discovery should cease immediately and an experienced ecologist called for advice. Erlas Black Wood would be suitable as a receptor site for any GCN found during the works.
- During construction works;
 - all materials will be stored off-ground on stillages or pallets.
 - all rubble/spoil/earth arising from works will be skipped or removed from site on a daily basis.
 - any excavations left overnight will either be back-filled and compacted or else covered by plastic sheeting and secured by plywood batons (or similar) to prevent GCN from gaining access.
 - pre-start checks of the working area will be undertaken each morning, looking for any GCN.
 - all site workers will be made aware of the potential presence of GCN and an identified sheet will be kept on site in case any of these animals are encountered.

The above RAMs have been designed such that the site can be carefully cleared without harming GCN and that subsequently the site is kept tidy and unsuitable for these species to utilise, so that they do not take refuge within the working area.

Provided this scheme of RAMs is followed in full, the risk of encountering, disturbing or harming GCN is considered to be very low.

It is noted that if any GCN are encountered, then works in the area of the finding will cease until the risk posed to protected species is re-assessed by a suitably experienced ecologist. If the risk posed is considered to be significant, then a license *may* be required in order for works to recommence.

1.3 Timing of Works

The above RAMs must be initiated during the active GCN period, when any GCN that are encountered can be safely disturbed and moved without posing a serious risk of harm.

Works must therefore commence during the period March to October inclusive. Before the end of the period, all breaking of ground and clearance of the working area must have been completed. Construction works can continue outside of this period, provided the 'tidy-site' measures are implemented in full.

1.4 Roles & Responsibilities

The following roles and responsibilities are defined:

GCN Licensed Ecologist

- Preparing and delivering a pre-commencement Toolbox Talk to all site workers.
- Undertaking pre-commencement hand-searches of the working area.
- Being available on-call to respond to any incidental amphibian finds.
- Recording and reporting all actions taken under this RAMs.

Developer

- Marking out the required working area.
- Ensuring all site workers either attend the Toolbox Talk or cascade the Toolbox Talk to them at a later date.
- Record the attendance at Toolbox Talk(s).
- Appoint a suitably experienced contractor to undertake site clearance.
- Ensure that their Principal Contractor and all sub-contractors follows the 'tidy-site' measures described herein.
- To stop works if any amphibians are found.

APPENDIX C

GCN REFUGIA SURVEY RESULTS



Ipsen East, Ash Road North
Wrexham Industrial Estate, Wrexham
Proposed Manufacturing Facility

Produced For;
Locklove Mitchell Architects Ltd

GCN SURVEY REPORT

October 2023

1 INTRODUCTION

- 1.1 This report has been produced for Lovelock Mitchell Architects Ltd in relation to the proposed development of land off Ash Road North, Wrexham Industrial Estate.
- 1.2 The proposed development is for the construction of a manufacturing facility and associated car parking and landscaping on the former Proserve Site at Land on Ash North Road, Wrexham Industrial Estate, Wrexham (Planning Ref: P/2023/0482).
- 1.3 Concerns were raised by Natural Resources Wales (NRW) and Wrexham CBC following the submission of a Preliminary Ecological Appraisal (PEA) produced by Cambrian Ecology Ltd (May 2023). The report highlighted the presence of GCN within the local area and also identified a number of stockpiles at the southeast corner of the site which offered potentially suitable refugia for GCN.
- 1.4 Consultation with the Wrexham CBC Ecologist led to the preparation of Reasonable Avoidance Measures (RAMs) by Etive Ecology Ltd (August 2023) which aimed to determine the presence/absence of GCN within these stockpiles. This report details the finding of the amphibian surveys carried out under those RAMs.

2 METHODOLOGY

- 2.1 The following actions were undertaken to establish GCN presence/absence, as per the RAMs:
 - Install a ring of GCN exclusion fencing around the rubble piles, off-set approximately 1m from the foot of the stockpiles. The upright exclusion fence was installed to industry standard specification (GCN Mitigation Guidelines, 2001).
 - Artificial refugia in the form of 50cm x 50cm squares of carpet tile were laid every 5m along the inside of the ring fence.
 - Carpet tiles were checked daily for a period of two weeks (14 days) to determine presence/absence of GCN.
- 2.2 The ring fence was installed on 12th September and the refugia checks were completed on 26th September following 14 consecutive mornings of checks for amphibians. The survey findings are presented in Section 3 below.
- 2.3 The survey effort was undertaken in accordance with best practise in terms of survey methods and timing. It is therefore considered that there were no limitations to the survey effort and the conclusions drawn are robust and reliable.

Site Location & Survey Area



3 RESULTS

- 3.1 The details of the GCN survey dates and weather conditions are given in Table 3.1 below. The perimeter fencing was installed and artificial refugia were laid on 12th September 2023 by Ecological Land Management Ltd. Subsequent checks were carried out by Russell Grey (CEnv, MCIEEM) and Sophie Frost (Grad CIEEM).

Table 3.1 GCN Survey Details

Survey No.	Date	Weather Conditions
1	September 13 th 2023	>5°C, no wind, 10% cloud cover, no rain
2	September 14 th 2023	>5°C, slight breeze, 100% cloud cover, no rain
3	September 15 th 2023	>5°C, mild breeze, 80% cloud cover, no rain
4	September 16 th 2023	>5°C, slight breeze, 70% cloud, light rain
5	September 17 th 2023	>5°C, slight breeze, 100% cloud, recent heavy rain
6	September 18 th 2023	>5°C, slight breeze, 100% cloud cover, moderate rain
7	September 19 th 2023	>5°C, mild breeze, 100% cloud cover, light rain
8	September 20 th 2023	>5°C, strong wind, 80% cloud cover, no rain
9	September 21 st 2023	>5°C, mild breeze, 40% cloud cover, no rain
10	September 22 nd 2023	>5°C, mild breeze, 70% cloud cover, no rain
11	September 23 rd 2023	>5°C, slight breeze, 50% cloud cover, no rain
12	September 24 th 2023	>5°C, moderate wind, 100% cloud cover, no rain
13	September 25 th 2023	>5°C, moderate wind, 80% cloud cover, no rain
14	September 26 th 2023	>5°C, moderate wind, 50% cloud cover, no rain

- 3.2 No GCN or any other species of amphibian were found during the course of the 14 survey visits.

Weather conditions were perfectly suitable for amphibians over the duration of the survey effort. It is therefore concluded that GCN are absent from the existing stockpile.

- 3.3 Given that the other areas of land within the red line application site are assessed to be of lower value to GCN than the stockpile, and that they are located further away from the closest GCN record, it is concluded that GCN are likely absent from the whole of the red line application site.

4 RECOMMENDATIONS

- 4.1 Following the absence of any amphibians found during the survey effort, it is recommended that the stockpile be removed without the need for any further survey effort or a GCN License. However, a precautionary approach is still recommended to ensure that no amphibians are harmed during the works. The following approach is recommended:
- The exclusion fencing and artificial refugia will remain in-situ until the day that works are to commence on removing the stockpile.
 - The refugia will be checked by a GCN licensed ecologist at the start of works. Any amphibians present will be removed from the area and relocated into suitable adjacent habitat outside of the working area.
 - A minimum length of fencing will be removed under the supervision of the ecologist.
 - The stockpile will be dismantled using a large excavator under the direct supervision of the GCN Licensed ecologist. Where possible, the machine will lift the stockpile in sections, allowing the ecologist to check underneath and inside any cavities for any amphibians that may be present.
 - The stockpile will be lifted out of the fenced area and the waste material will be removed from site.
 - Once the stockpile has been fully dismantled, the remaining GCN fence will be removed under ecological supervision.
 - These works must be completed before the start of the hibernation period, taken to be the 1st November.
- 4.2. In accordance with the PEA Report submitted with the planning application for the site, a number of GCN hibernacula will be constructed outside of the development zone for the scheme. The hibernacula will meet the standard described in the GCN Mitigation Guidelines (English Nature, 2001). The precise locations will be determined on site but will be in the southeast corner of the site. These will be permanent mitigation features, for the long-term benefit of GCN and other biodiversity interests.