

Biosecurity Risk Assessment

March 2024

**Lady Margarets Park,
Wrexham**

Prepared by
CSA Environmental

On behalf of
The Caravan and
Motorhome Club

Report No: CSA/1992/11

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/1992/12	-	27/04/2024	CM	KK	



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1.0 INTRODUCTION

- 1.1 This Report has been prepared by CSA Environmental on behalf of The Caravan and Motorhome Club. It sets out the findings of a Biosecurity Risk Assessment (BRA) of an extension field, within Lady Margarets Park, Wrexham (hereafter referred to as 'the Site'). Conditional planning permission (ref: CHI P/2022/0066) has been granted at the Site for which the construction of caravan pitches with tarmac road, glamping units, safari tents, car park, linen storage shed and access paths is proposed.
- 1.2 The Site occupies an area of c. 1.7ha and is located around central grid reference SJ 2849 3748, to the west of Chirk. It consists of one semi-improved grassland field, bounded to the west and north-west by mature woodland, to the east by dense scrub and railway corridor, and to the south-east by a large garden.
- 1.3 The Biosecurity Risk Assessment will discharge Condition 7 of the above planning permission which states:

"The development hereby permitted shall not commence until a Biosecurity Risk Assessment has been submitted to and approved in writing by the Local Planning Authority. The risk assessment shall include measures for the long term management of invasive species during both construction and operation. The development shall thereafter be carried out in accordance with the approved Biosecurity Risk Assessment."

2.0 LEGISLATION

Legislation

- 2.1 Legislation relating to wildlife and biodiversity of particular relevance to this BRA includes:
- EU Regulation (1141/2014) on invasive alien (non-native) species
 - Schedule 9 of the Wildlife and Countryside Act 1981 (as amended)
 - Natural Environment and Rural Communities (NERC) Act 2006
- 2.2 Section 14(1) of the Wildlife and Countryside Act makes it illegal to release or allow to escape into the wild any animal which is not ordinarily resident in Great Britain and is not a regular visitor to Great Britain in a wild state, or is listed in Schedule 9 to the Act. It is also illegal to plant or otherwise cause to grow in the wild any plant listed in Schedule 9 to the Act. The Schedule 9 list of animal and plant species has been amended by the Wildlife and Countryside Act 1981 (Variation of Schedule 9) (England and Wales) Order 2010. Offences under section 14 carry a maximum penalty of a £5,000 fine and/or 6 months imprisonment on summary conviction (i.e. at Magistrates' Court) and an unlimited fine (i.e. whatever the court feels to be commensurate with the offence) and/or 2 years imprisonment on indictment (i.e. at Crown Court). Appendix 1 gives the full list of plant species in Schedule 9 of the WCA for England and Wales.
- 2.3 The Natural Environment and Rural Communities (NERC) Act 2006 amended the WCA 1981 and gave the Secretary of State powers to ban the sale of invasive non-native species known to cause damage to wildlife in England and Wales.
- 2.4 The Invasive Alien Species Regulation (Regulation (EU) 1143/2014) includes a set of measures to be taken across the EU in relation to invasive alien species. The core of the Regulation is the list of Invasive Alien Species of Union concern (Union List). The species included on this list are subject to restrictions and measures set out in the Regulation. These include restrictions on keeping, importing, selling, breeding, growing and releasing into the environment.

3.0 BACKGROUND INFORMATION

Desktop study and Field Survey

- 3.1 An initial extended Phase 1 Habitat survey was carried out in fine and dry weather conditions on 23 March 2021 by Cerian MCIEEM, encompassing the Site and immediately adjacent habitats that could be viewed. An update walkover of the Site was carried out in fine and dry weather conditions on 07 July 2023 by Cerian Thomas MCIEEM. As the previous survey was undertaken in Phase 1 Survey Standard, for consistency the same methodology was used for the update.

Background Survey Information

- 3.2 The Site comprises one semi-improved grassland field, which on the initial visit appeared to be managed on a regular basis, with close mown paths through it for informal use by park visitors, and longer grassland banks around the perimeter. By July 2024 use of the field for dog walking appeared to have ceased within the field, with management of the field relaxed. Whilst the field is still grass dominant, an increase in botanical diversity was recorded in certain areas of the Site. The north-western corner of the Site comprised a more open sparse spoil heap with dense scrub and ruderal vegetation recorded than previous. Further detail on species composition can be found within the Preliminary Ecological Appraisal (CSA/1992/04b).

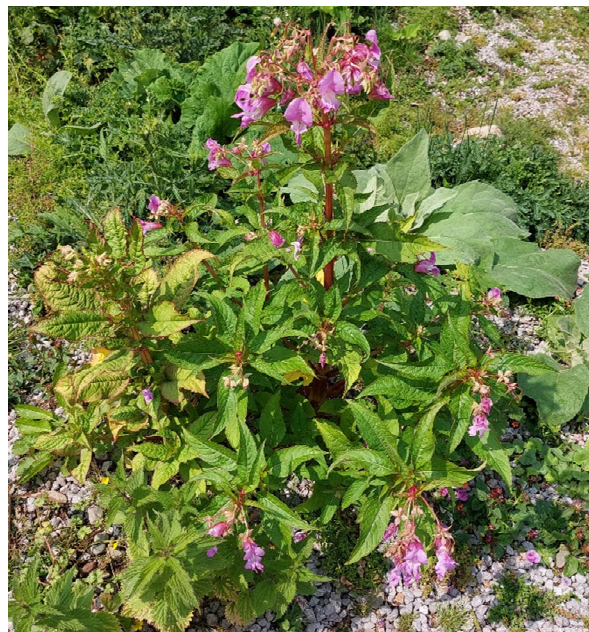


Image 1: Himalayan balsam located to the north-east corner of the Site.

- 3.3 Of note was the presence of a Schedule 9 non-native, invasive species, Himalayan balsam *Impatiens glandulifera* (illustrated in image 1 above)

which had previously been recorded nearby along the river corridor, but not on-site.

- 3.4 Protected species surveys within the adjacent caravan park confirmed the presence of common and widespread bat species. Rarer bat species such as lesser horseshoes *Rhinolophus hipposideros*, are known to be present locally and are likely to use onsite habitats for foraging/dispersing. A population of great crested newts (GCN) is known to be present within 300m of the Site. Whilst the likelihood of great crested newts utilising the Site is low, enhancement measures such as the creation of hibernacula and log piles, will be implemented within scheme design. The onsite habitats also offer suitable nesting opportunities for a variety of hole and scrub nesting bird species. Full details on relevant fauna can be found within the Preliminary Ecological Appraisal. A Risk Avoidance Method Statement (CAMC, no ref) and GCN Artificial Refugia Note (CSA/1992/13) have been prepared to address risks relating to GCN and are not considered further within this report.

4.0 METHODS

Site Biosecurity Risk Assessment

- 4.1 The Site Biosecurity Risk Assessment has been produced following the proforma set out by the Department for Environment Food and Rural Affairs on 'Personal Biosecurity Guidance' (Defra 2022).
- 4.2 Activities that may spread Invasive Non-Native Species (INNS), notably Himalayan balsam, are listed and each is assessed on the Severity (S) and Likelihood (L) of spreading INNS according to the below tables and relevant scores. An overall Risk is calculated by multiplying S x L. A score of 6 or less is usually considered acceptable for a development to proceed and a score of 16 or above are unacceptable.

Severity of Impact

- 4.3 Non-native species have the potential to cause impact to the Site's natural setting, native habitats, fauna and flora. The severity of the impacts should be rated according to the following table.

Table 1. Severity of impacts

1	Introduction of biosecurity threat unlikely to establish or spread
2	Introduction of biosecurity threat that may establish and require temporary measures and minor costs to remove
3	Introduction of biosecurity threat that establishes, spreads further and requires long term management and financial costs to remove
4	Introduction of biosecurity threat that permanently establishes and spreads in the wider environment requiring ongoing intensive measures and financial/social costs to mitigate its impact
5	Introduction of unmanageable biosecurity threat that establishes and spreads in the wider environment causing catastrophic impacts to native species/agriculture/aquaculture/animal or human health at great financial/social cost

Likelihood of spread

- 4.4 This parameter is a consideration of how likely the activity is to cause the spread of a non-native species, and should be rated to the following table:

Table 2. Likelihood of spread

1	Could happen, but probably never will
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2	Not likely to occur in normal circumstances
3	May occur at some time
4	Expected to occur at some time
5	Expected to occur regularly under normal circumstances

- 4.5 The aim is to reduce the risk rating to as low as is reasonably practicable, a score of 4 or less is usually considered acceptable and a score of 12 or above is unacceptable and the project/development should be postponed and altered to reduce the risk to acceptable levels.

Table 3: Risk matrix

Severity of impact	5	5	10	15	20	25
	4	5	8	12	16	20
	3	3	6	9	12	15
	2	2	3	6	8	10
	1	1	2	3	4	5
		1	2	3	4	5
	Likelihood of spread					

- 4.6 Control measures are identified and described that should be taken to reduce the likelihood of INNS being spread. The risk assessment is then re-calculated, where a rating of 1-5 is assigned for the Residual Likelihood (RL) of INNS being spread after the implementation of relevant control measures. This parameter is multiplied by the original severity (S) to find the Residual Risk (RR).
- 4.7 Re-calculated risk and their associated outcomes are described below:
- **0–6:** Acceptable – additional controls where required/ensure existing controls are maintained
 - **7–15:** Reduce risk to acceptable level where reasonably practicable to do so. May need to apply interim controls until task is complete
 - **16 +:** Risk must be reduced before work starts. High level of supervision and monitoring required for the task

5.0 SITE BIOSECURITY RISK ASSESSMENT

- 5.1 Himalayan balsam is already recorded at the Site. There is risk of this spreading to other areas within or outside the Site as a result of construction/management activities, or through natural processes.
- 5.2 In addition, construction/operational activities at the Site could introduce other INNS from elsewhere. This assessment relates specifically to plant species as invasive animal/bird species are either already ubiquitous (e.g. grey squirrel *Sciurus carolinensis*) or of limited relevance to on-site habitats e.g. aquatic species.
- 5.3 Activities that might spread invasive non-native species through the Site are described in Table 4 below:

Table 4. Biosecurity risk assessment of the Site.

Activities that could spread invasive/non-native species	Severity of Impact	Likelihood of spread	Overall Risk
Transportation of seed/stem fragments into Site from external locations. Either on vehicles or feet	2	3	6
Transportation of seed/stem fragments into Site within contaminated materials	2	4	8
Spread of seed/stem fragments in shrubs and hedge plants brought onto Site	2	3	6
Transportation of Himalayan balsam seed within the Site through movement of materials	2	4	8
Natural spread of seed/stem fragments through wind or natural seed dispersal	2	4	8
Deliberate introduction of seed/stem fragment/plants	2	3	3
Spread of Himalayan balsam from on-site to surrounding habitats through foot traffic and transport of contaminated soil	2	4	8

- 5.4 Control measures and management tasks have been identified that will reduce the risk level of the identified activities. The residual risk is then recalculated in Table 5 below.

Table 5. Re-calculated biosecurity risk assessment of the Site, after control measures considered.

Activities that could spread invasive/non-native species	Control Measures	Severity of Impact	Likelihood of spread (Residual Likelihood)	Overall Risk (Residual Risk)
Transportation of seed/stem fragments into Site from external locations. Either on vehicles or feet	Good site hygiene maintained at all times. No overly dirty vehicles or footwear allowed on-site, vehicles, machinery and footwear to be free from mud or visible dirt previous to entering the Site. If vehicles, machinery or footwear is used on another site, known to have INNS, then it is to be cleaned of visible dirt. All site workers made aware of the Biosecurity Risk Assessment.	1	2	2

Transportation of seed/stem fragments into Site within contaminated materials	Where possible no soil or materials will be imported/exported to/from the Site. When procuring quarried or recycled materials such as hardcore, topsoil etc. ensure reputable companies are used and ensure materials sourced from uncontaminated areas. Any materials removed from the Site which could be contaminated with Himalayan balsam or seeds should be treated as contaminated waste and disposed of accordingly.	2	2	4
Transportation of seed/stem fragments within the Site through movement of materials	A combination of stem lifting and spraying of Himalayan balsam within affected areas will be conducted to reduce the species before construction commences on-site. Ongoing management of the area should be carried out with repeated pulling of Himalayan balsam in spring (before they go to seed). New plants will continue to grow from dormant seed, or colonisation from adjoining land. Control measures should be adapted according to best practice for the species that is encountered	2	2	4
Spread of seed/stem fragments in shrubs and hedge plants.	All plants to be acquired from reputable suppliers who confirm that they follow appropriate biosecurity measures.	1	2	2
Natural spread of seed/stem fragments through wind or from adjoining land	Be vigilant. Site manager and contractors to take the responsibility of knowing what the likely INNS look like and their eradication methods. Monitoring surveys undertaken annually.	2	2	4
Deliberate introduction of seed/stem fragment.	Be vigilant. Site manager and contractors to take the responsibility of knowing what the likely INNS look like and their eradication methods. Monitoring surveys undertaken annually during operation.	1	2	2
Spread of Himalayan balsam from on-site to surrounding habitats through foot traffic and transport of contaminated soil	Treat spoil from site as contaminated waste, do not park near balsam areas, clean footwear after working in these areas. Manage balsam through cutting/pulling annually to reduce spread /seeding.	2	2	4

- 5.5 It should be noted that with all precautionary measures, the likelihood of spreading INNS is not totally eliminated, only reduced. With the addition of the control measures set out in the above table, no risk exceeds '4' and it is therefore considered acceptable. The development can proceed without further works regarding INNS.
- 5.6 If construction activities should change, that in turn could cause the spread of INNS, a biosecurity risk assessment of each new activity should be conducted, and any new control measures should be put in place accordingly to maintain a residual risk of '6' or below.

- 5.7 Monitoring the spread and extent of Himalayan balsam at the Site, and the presence of any other INNS should be undertaken regularly as part of the ongoing management regime for the Site, with control measures updated as necessary.

Appendix A

Ecological notes and Identification sheets for Himalayan balsam

Himalayan Balsam

Species Description

Scientific name: *Impatiens glandulifera*

AKA: Policeman's Helmet, Indian Balsam, Jac y Neidiwr (Welsh)

Native to: West and central Himalayas

Habitat: Found mostly on river banks and in damp woodland, can grow in other damp habitat

A tall, attractive, annual herb with explosive seed heads. Although easy to identify as a mature plant with its pink-purple flowers, fleshy stem and characteristic leaves, the seedlings and last year's dead stems of this annual are more difficult to spot.

Introduced as a garden plant in the early 19th century and first recorded in the wild in 1855. Often favoured by the general public for its aesthetic appeal and is still deliberately planted on occasion. Now widespread in the UK, especially along urban rivers. Spreads solely by seeds, which are small and easily carried by wind or water.

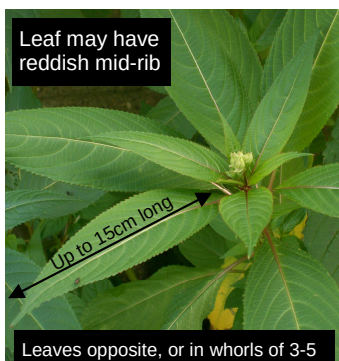
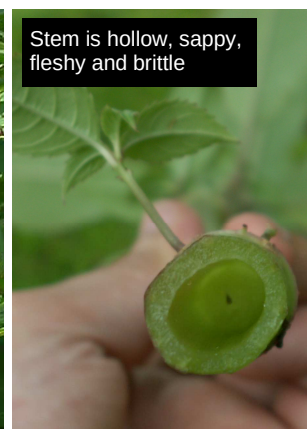
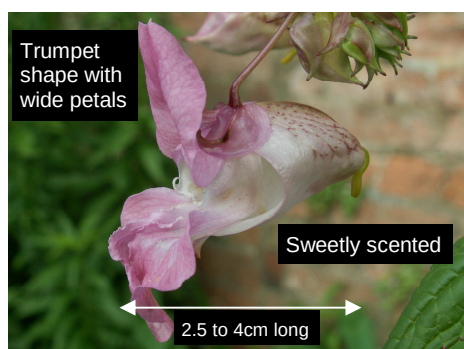
Out-competes native species in ecologically sensitive areas, particularly river banks. Where it grows in dense stands along river banks it can impede flow at times of high rainfall, increasing the likelihood of flooding. Die back of extensive stands over winter can leave river banks bare and exposed to erosion.

Himalayan balsam is listed under Schedule 9 to the Wildlife and Countryside Act 1981 with respect to England and Wales. As such, it is an offence to plant or otherwise allow this species to grow in the wild.

For details of legislation go to www.nonnativespecies.org/legislation.



Key ID Features



Identification throughout the year

Can be identified at most times of the year: March-June by its seedlings, stem and leaf shape, from July to September by its stem, leaf shape and flowers. More difficult to identify over winter (October to February), look for hay like remains and distinctive root structure.



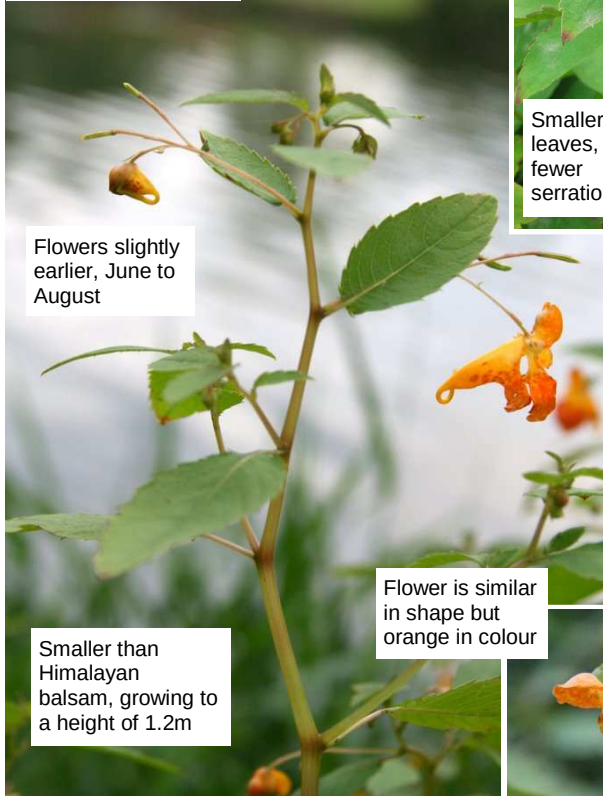
Hay like remains in winter



Root structure in winter

Similar Species

Orange Balsam
Non-Native
(*Impatiens capensis*)



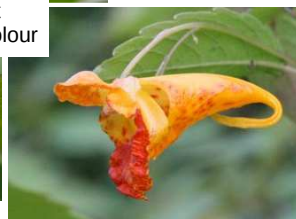
Smaller leaves, with fewer serrations

Flowers slightly earlier, June to August

Orange balsam is much less aggressive than Himalayan balsam, forming smaller less dense stands

Flower is similar in shape but orange in colour

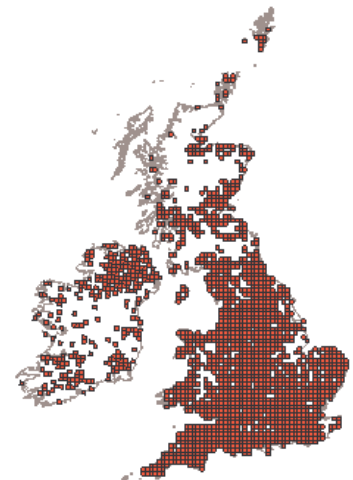
Smaller than Himalayan balsam, growing to a height of 1.2m



Distribution

Widespread and common across the whole of the UK. Primarily on riverbanks and in other damp areas.

Source: NBN Gateway. Check website for current distribution



References and further reading:

- Blamey, M, Fitter, R and Fitter, A (2003) "The Wild Flowers of Britain and Ireland. The Complete Guide to the British and Irish Flora". A & C Black
- Preston, C D, Pearman, D A and Dines, T A (editors) (2002) "New Atlas of the British and Irish Flora". Oxford University Press
- Stace, C (1999) "Field Flora of the British Isles". Cambridge University Press



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