

Planning Application: P/2023 /0136 - Coedlan Goffa Hafod y Bwch Commemorative Woodland

Applicant: Ymddiriedolaeth Genedlaethol National Trust



Site Location: Hafod y Bwch Commemorative Woodland, Hafod Road, Ruabon, Wrexham, LL14 6HF

Operational Invasive Non-native Species (INNS) Management

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Introduction

This document concerns operational INNS management and it has been produced in response to the planning consultation “PLN Consultation Response - Natural Resources Wales (NRW) - WEB - P-2023-0136 V3” 3rd July 2023. This document contains:

- measures or actions that aim to prevent INNS from being introduced to the site for the duration of the operations;
- operational measures to control INNS onsite and
- long term strategic management of INNS.

This document will be used to inform the long-term management plan for the commemorative woodland, so to provide consistency in the National Trust’s management interventions. The control and prevention of INNS during the scheme’s construction phase is addressed within the Biosecurity Risk Assessment and Method Statement (BRAMS) document provided. The BRAMS will also be submitted to National Resources Wales (NRW) as an annex to the development licence Method Statement for the scheme.

The site at Hafod consists of former agriculturally improved fields (animal grazing) which form part of the National Trust Erddig Estate near Wrexham. The Hafod site initially had limited value for biodiversity, but some habitats had remained, including an ephemeral pond and hedgerows, which are likely to be used by wildlife. Around nine and a half hectares of land has been proposed for the creation of a commemorative woodland in partnership with Welsh Government. The environmental and ecological benefits of the proposed scheme relate to planting 14,500 new trees, new hedge planting and improving existing hedges, wildflower meadow creation (circa 1.3ha), new ponds / scrapes, adding bird and bat boxes, creating bee banks, and bulb planting.

Non-native Species (NNS), sometimes referred to as non-indigenous species, are any animals, plants, fungus, or micro-organisms that have been introduced by human action (either deliberately or accidentally) into an area in which they do not naturally occur. Invasive Non-native Species (INNS), sometimes referred to as invasive alien species, are non-natives species having the ability to spread quickly and that can become dominant within an area or an ecosystem, ultimately having adverse impacts. Uncontrolled INNS can have detrimental impacts from environmental, economic, and social perspectives. For example, INNS are the second greatest threat to biodiversity after habitat loss and fragmentation¹. INNS can also have significant negative economic impacts and it has been estimated that the cost to the Welsh economy is £125million a year². Consequently, it is imperative that the adverse impacts from INNS are systematically evaluated and managed to promote best practice biosecurity (reducing the risk of introducing or spreading INNS in the wild). Formulating effective plans for addressing the impacts of INNS requires the definition of clear priorities, objectives, and a systematic (repeatable) management approach.

Section 14(1) of the Wildlife and Countryside Act 1981 (as amended) 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

¹ [Wales Biodiversity Partnership - Invasive Non-Native Species Group \(biodiversitywales.org.uk\)](https://biodiversitywales.org.uk/)

² [Natural Resources Wales / SoNaRR2020: Invasive non-native species \(INNS\)](#)

by the Wildlife and Countryside Act 1981 (Variation of Schedule 9) (England and Wales) Order 2010.

INNS control and prevention

The actions and measures within this document for operational INNS are categorised to the Convention on Biological Diversity³ (CBD) 3-stage hierarchy (also part of the GB Strategy⁴):

- 1) Prevention (primary focus of this proposal); followed by,
- 2) Early detection and rapid response; followed by,
- 3) Long term strategic management.

The key drivers informing the content of the next three sections are The National Trust's compliance with primary and secondary legislation, Priority Species for Action in Wales, NRW INNS best practice guidance, and the Check-Clean-Dry mantra⁵ advised as part of the Stop the Spread campaign.

1) Prevention measures or actions to prevent INNS and specific diseases

- Ongoing risk identification and management control workshops concerning new and existing INNS threats;
- Providing information / raising public awareness of INNS risks on the site's main information board and through other information posts at the main water courses;
- Ongoing training / awareness sessions for Rangers, contract maintenance staff, and volunteers so that they understand risks and controls for INNS priority species;
- The Check-Clean-Dry mantra will be followed by all Trust and contract staff:
 - Check - Check your equipment, clothing and boots and remove any plant or animal 'hitchhikers'.
 - Clean - Clean equipment, clothing and boots thoroughly, remove all mud, leaves and plant debris. If it is not possible to clean on site, securely bag items and clean at a suitable location where risk of transfer of diseases is minimised. Wash vehicle tyres and wheel arches if muddy and park on hard-standing if possible.
 - Dry - Dry thoroughly any equipment or PPE that has been in freshwater or the marine environment; some INNS can live on damp items for weeks.
- Enhanced ecology area – deployment of a fenced-off (circa 100-120 running metres 1.2m high fence) area including one of the new ponds / scrapes (subsidiary benefits to other species such as potentially protecting Great Crested Newts) – the indicative location of this fencing is shown on drawing CCW_P10_Proposed Ecology Plan - VB
- The fencing excludes dog and other animals - dogs can spread invasive plants, including New Zealand pigmyweed (*Crassula helmsii*) - furthermore, the impacts of their worm, tick and flea treatments, some of which contain chemicals that are harmful to aquatic invertebrates, including the neonicotinoid imidacloprid, may also contribute to habitat degradation;

³ [Home | Convention on Biological Diversity \(cbd.int\)](http://cbd.int/)

⁴ [GB Strategy » NNSS \(nonnativespecies.org\)](http://nonnativespecies.org/)

⁵ [Check Clean Dry » NNSS \(nonnativespecies.org\)](http://nonnativespecies.org/)

- The tree species and shrubs in the planting plan are predominately native (to create competition with INNS plant species and ultimately create canopy cover);
- Chytrid fungus and ranavirus (ARG UK Advice Note 4) - Spread of these diseases is largely associated with the handling of amphibians or activity at waterbodies. When maintaining the ephemeral pool and new ponds / scrapes the operatives must disinfect their footwear and equipment that has been reused from pond / water course work undertaken on other sites;
- Report notifiable pests and diseases and share information of new threats or presence of INNS with key partners, including Wrexham Council's Rangers (the Bonc Yr Hafod Country Park is adjacent to the commemorative woodland);
- The woodland scheme design has designated paths to direct people's movement across the site - this mitigates the risk, to some extent, of people spreading the seed of INNS plants and diseases via contaminated soil or spores (such as from Chytrid fungus) on footwear;
- Cleaning soil from tools and maintenance vehicle tyres that have been driven on the main Erddig estate or by contractors having worked on other non-Trust sites;
- Only maintenance vehicles will be allowed onsite;
- Refuelling of machinery or potentially vehicles will be carried out in accordance with the appropriate Environment Agency Guidance for Pollution Prevention and all other relevant pollution guidance.

2) Early detection and rapid response / onsite control of INNS

- All management operations would be the subject of a Great Crested Newt operational / conservation licence as required;
- Should any diseased amphibians be located or suspected, the Amphibian and Reptile Conservation (ARC) (<https://www.arc-trust.org/>) / NRW will be contacted for further advice - any nets used will be subject to disinfection;

The following is a summary of biosecurity measures to be implemented when handling any amphibians. Further details are provided in the ARG UK Advice Note 4 which should be referred to for further information.

- Handle amphibians only when necessary.
- If handling amphibians, or if contact with pond water is necessary, wear powder-free disposable vinyl gloves which you rinse before contact with the amphibians. Use vinyl rather than latex or nitrile because the latter two may be harmful to amphibians.
- Use a fresh pair of gloves for each site (pond/ waterbody) visited.
- Ensure that all workers wash their hands thoroughly with soap or hand sanitising gel and water after each day/ before moving to another site.
- Wash all clothing on a 40°C cycle with biological detergent, after exposure to amphibians or pond/ ditch water.
- Do not release amphibians anywhere except at the place of capture.
- Ranger or contractor checks for the presence / early identification of *Cotoneaster* (*Cotoneaster horizontalis*), Himalayan balsam (*Impatiens glandulifera*), Giant Hogweed (*Heracleum mantegazzium*), Japanese Knotweed (*Fallopia japonica*), New Zealand Pigmyweed (*Crassula helmsii*), Curly Waterweed (*Lagarosiphon majorand*) and other invasive plant species as stipulated by primary legislation and the Long-Term INNS Management Policy (Wales);

- Treat and dispose of INNS plants through (in accordance with species specific treatment procedures and protocols):-
 - Spraying with chemicals
 - Pulling out or digging out live, dead or dying plants
 - Cutting back plants to prevent seeds from dispersing
 - Burying them
 - Burning them (subject to licence requirements)
 - Disposing of them offsite (in accordance with Biosecurity procedures)
- Control methods adopted for specific species;
- Ranger and contractor health checks on trees and other plant species for the presence of INNS.

3) Long term strategic Management

- Long-term strategic management objectives:
 - Increase the understanding of INNS risks and their potential impacts across social, environmental and economic perspectives;
 - Adopt a collaborative management approach to INNS, internally and through sharing information and knowledge with partner organisations (e.g. Wrexham County Borough Council and NRW);
 - Raise the awareness of and improve the effectiveness in the adopted biosecurity controls through regular reviews and taking insights from the latest research information;
 - Minimising chemical usage (herbicides and pesticides) in the treatment of INNS – evaluate the need for chemical usage on a per species / outbreak and per location basis - focus management intervention upon prevention measures – record the actual volume of chemicals being used.
- The strategic / long-term management associated with the woodland site (and the wider Erddig estate) is inextricably linked with the INNS long-term management priority species for Wales, sourced from biodiversitywales.org.uk – these species are subject to both the prevention and early detection approaches that have been established in this paper.

Conclusions

This multi-faceted and hierarchical proposal to manage operational INNS risks provides a robust and comprehensive plan to protect the commemorative woodland, its wildlife, ecosystems, biodiversity, and the people that visit or work within it. This document will be used to inform a new commemorative woodland management plan and an update to the wider Erddig estate management plan. Both management plans will be reviewed and updated on an ongoing basis as new INNS threats are identified. Collaborative working within the Trust through its multi-disciplinary teams and with key partners such as Wrexham County Borough Council and NRW, are an integral part of the successful delivery of the proposed plan.