

**Nick Bateman  
Principal Architectural Assistant  
Wrexham County Borough Council  
Housing & Economy Department  
Ruthin Road  
Wrexham  
LL13 7TU**

31<sup>st</sup> August 2022

**Our Ref:** C489-WCBC-Sch9\_Plants\_Survey-310822-TK

Dear Nick

**Re – Schedule 9 Plant Survey at The Bungalow, Henblas Street, Wrexham**

**Introduction**

'Section 14(1) of the *Wildlife and Countryside Act 1981* (as amended) makes it an offence 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 an offence to plant or otherwise cause to grow in the wild any plant listed in *Part II* of *Schedule 9* to the Act'<sup>1</sup>. *Section 14 (1)* covers spreading the species or transferring polluted ground material from one area to another.

The *Invasive Alien Species (Enforcement and Permitting) Order 2019*<sup>2</sup> relates to the prevention and management of the introduction and spread of (certain) non-native species and the associated licensing/ permitting system.

Plants are listed under *Part II* of *Schedule 9* of the *Wildlife and Countryside Act 1981*<sup>3</sup>. Henceforth in this letter report such plants will be referred to as '*Schedule 9* plants'.

Marches Ecology was commissioned by Wrexham County Borough Council (WCBC) to undertake a *Schedule 9* plant survey of land at The Bungalow, Henblas Street, Rhostyllen (Approximate OS Grid Ref. SJ 3134 4875).

It is proposed to demolish The Bungalow along with a detached garage and all other built structures on the site. Site clearance including vegetation would be undertaken at the same time.

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<sup>1</sup> <https://www.nonnativespecies.org/legislation/england-and-wales/>

<sup>2</sup> <https://www.legislation.gov.uk/uksi/2019/527/contents/made>

<sup>3</sup> <http://www.legislation.gov.uk/ukpga/1981/69/schedule/9>

This letter report presents the findings of the *Schedule 9* plant survey. The principal aims of the survey were as follows:

- to identify all *Schedule 9* plants present within the surveyed area; and
- to accurately record the location of those *Schedule 9* plants.

It should be noted that while every effort was expended during the survey visit on 24<sup>th</sup> August 2022 to locate, identify and record all *Schedule 9* plants within the survey site Marches Ecology can offer no guarantee that all such plants were found. Furthermore, this letter report confers no guarantee for the subsequent success of treatment of the *Schedule 9* plants or should such plants remain present/ or re-grow following such treatment.

### **Methodology**

The *Schedule 9* plant survey was undertaken on 24<sup>th</sup> August 2022 by Tom Knight of Marches Ecology. The weather was warm with a light breeze and 90% grey cloud.

The surveyed area is shown on *Figure 1* (attached to this letter report). The land within this boundary is referred to henceforth as the 'survey site'. All parts of the survey site were visited wherever possible. Immediately adjacent habitat was considered where deemed appropriate and viewed from the survey site boundary where possible.

Where *Schedule 9* plants were identified the species, growth state and exact location were recorded. The location was recorded on a plan of the survey site.

August is an optimal time of the year for general botanical recording, although early-flowering species may not be visible. However, it is unrealistic to suppose that walk-through surveys can generate completely exhaustive species lists at any time of year. In some instances, identification to species level is aided by interrogation of features present at different times of the year (e.g., flowers and fruit on *Cotoneasters*). Plant nomenclature in this report follows Stace (2022)<sup>4</sup>.

### **Survey Limitations**

The main constraint to the survey was due to the presence of dense shrubs/ vegetation in some parts of the survey site. This may have obscured the presence of some *Schedule 9* plants and prevented direct access to some areas. Similarly, access to some small parts of the survey site was difficult or not possible due to the various buildings present.

As noted above identification of some plants, particularly species of *Cotoneaster*, is easier if the specimen is viewed at different times of the year. *Cotoneaster* has been identified to species level where possible.

### **Results**

The locations of all *Schedule 9* plants recorded are presented on *Figure 1*. The Target Notes (numbered 1 to 11) are provided in *Table 1* at the end of this letter report and shown on *Figure 1*. The following *Schedule 9* plants were recorded from the survey site:

- *Cotoneaster* cf. *simonsii* (Himalayan *Cotoneaster*).
- *Cotoneaster horizontalis* (Wall *Cotoneaster*).
- *Crocasmia* × *crocosmiiflora* (Montbretia).
- *Rhododendron* sp. (*Rhododendron*).

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<sup>4</sup> Stace, C. (2022). *Concise Flora of the British Isles*. C&M Floristics, Middlewood Green.

It was not possible to identify the *Rhododendron* to species level.

Most of the *Schedule 9* plants recorded are located in the front garden or towards the southern end of the rear garden. Photos are provided in *Appendix 1* at the end of this letter report.

## **Conclusions**

A biosecurity risk assessment or similar document should be produced and implemented by a specialist contractor with experience in management/ control of *Schedule 9* plants. This risk assessment/ document should detail appropriate methodologies for control of the *Schedule 9* species identified within the survey site both prior to and, if necessary, during any demolition works undertaken at the site. If it is deemed necessary to dispose of any of the *Schedule 9* plant material off site then the specialist contractor will need to be a registered waste carrier, require the relevant environmental permit, and need to take the material to an authorised landfill site.

It is likely that part of the Great Crested Newt Reasonable Avoidance Measures (RAMs) would need to precede any management/ control of *Schedule 9* plants. This would include removal of (other) vegetation and hand-/ destructive searches.

Further information on control of *Schedule 9* species is available at:

- <https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants>
- <https://www.nonnativespecies.org/home/index.cfm>
- [https://www.nonnativespecies.org/assets/fc\\_managing\\_and\\_controlling\\_invasive\\_rhodo\\_2006.pdf](https://www.nonnativespecies.org/assets/fc_managing_and_controlling_invasive_rhodo_2006.pdf)
- [https://wric.ucdavis.edu/information/natural%20areas/wr\\_C/Crocosmia.pdf](https://wric.ucdavis.edu/information/natural%20areas/wr_C/Crocosmia.pdf) <sup>5</sup>
- <https://insideecology.com/2017/10/04/invasive-non-native-species-uk-cotoneaster/#:~:text=Control%20Measures&text=Any%20material%20from%20the%20cotoneaster,larger%20plants%20to%20prevent%20regrowth.>
- <https://naturalresources.wales/about-us/news-and-events/blog/controlling-cotoneaster-across-north-wales/?lang=en>

Over 70 species of *Cotoneaster* are naturalised in Britain, though many only rarely so (Rich & Jermy 1998)<sup>6</sup>. To date five species of *Cotoneaster* have been listed on *Schedule 9*<sup>7</sup> in England and Wales as follows:

- *Cotoneaster integrifolius* (Entire-leaved *Cotoneaster*).
- *Cotoneaster simonsii* (Himalayan *Cotoneaster*).
- *Cotoneaster bullatus* (Hollyberry *Cotoneaster*).
- *Cotoneaster microphyllus* (Small-leaved *Cotoneaster*).
- *Cotoneaster horizontalis* (Wall *Cotoneaster*).

Several species of *Cotoneaster* are very similar, variable and are difficult to identify without samples from different times of the year. Due to these identification difficulties, it is suggested that all *Cotoneaster* within the survey site should be subject to control measures.

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<sup>5</sup> This information was produced for Australia; some of the herbicides listed may not be appropriate for use in the UK.

<sup>6</sup> Rich, T.C.G. & Jermy, A.C. (1998). *Plant Crib 1998*. Botanical Society of the British Isles, London.

<sup>7</sup> <https://naturenet.net/law/sched9.html>

If you require any further information or have any queries regarding the findings presented in this letter report please do not hesitate to contact me.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'TKnight', with a stylized flourish at the end.

|                   |
|-------------------|
| <b>Tom Knight</b> |
| <b>Partner</b>    |

01691 777381

07928 212545

[tomknight@marchesecology.co.uk](mailto:tomknight@marchesecology.co.uk)

<http://www.marchesecology.co.uk>

Table 1 - Target Notes

| Target Note | Species                                                                                                                   | Notes                                                                                                                                                                                                                                                                                      |
|-------------|---------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1           | <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster).                                                           | One seedling to approximately 0.3 m high located in grassland by a Weeping Willow.                                                                                                                                                                                                         |
| 2           | <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster).                                                           | One seedling to approximately 0.3 m high located in grassland by a Weeping Willow.                                                                                                                                                                                                         |
| 3           | <i>Crocasmia</i> × <i>crocosmiiflora</i> (Montbretia) and <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster). | A patch on the edge of a defunct lawn that measures approximately 1.5 m by 2 m in extent. A young Cotoneaster to approximately 0.6 m high is by the southeast corner of the Montbretia.                                                                                                    |
| 4           | <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster).                                                           | Two or three semi-mature shrubs to approximately 2.3 m high covering an area of approximately 3 m by 3 m.                                                                                                                                                                                  |
| 4a          | <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster).                                                           | Two seedlings to approximately 0.3 m high. There could be more seedlings under the adjacent shrubs.                                                                                                                                                                                        |
| 4b          | <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster).                                                           | At least two semi-mature shrubs to approximately 2 m high with an adjacent young plant to approximately 1 m high.                                                                                                                                                                          |
| 5           | <i>Rhododendron</i> sp. (Rhododendron) and <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster).                | Three or four semi-mature shrubs of <i>Rhododendron</i> sp. (Rhododendron) to approximately 2.3 m high. They cover an area of approximately 5-6 m by 2-3 m. There are a number of seedlings/ young plants of Cotoneaster beneath the Rhododendron. It was not possible to see all of them. |
| 6           | <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster).                                                           | Two semi-mature shrubs to approximately 2.2 m high on the edge of the Rhododendron at <i>Target Note</i> 5.                                                                                                                                                                                |
| 7           | <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster).                                                           | One semi-mature shrub to approximately 2.3 m high growing amongst a Fuchsia.                                                                                                                                                                                                               |
| 8           | <i>Crocasmia</i> × <i>crocosmiiflora</i> (Montbretia).                                                                    | A patch extending to approximately 1.5 m by 1.5 m.                                                                                                                                                                                                                                         |
| 9           | <i>Cotoneaster horizontalis</i> (Wall Cotoneaster).                                                                       | A semi-mature shrub that is largely prostrate. By the side of a shed.                                                                                                                                                                                                                      |
| 10          | <i>Cotoneaster</i> cf. <i>simonsii</i> (Himalayan Cotoneaster).                                                           | A semi-mature shrub to approximately 2.3 m high. By the side of a shed.                                                                                                                                                                                                                    |
| 11          | <i>Crocasmia</i> × <i>crocosmiiflora</i> (Montbretia).                                                                    | A small clump partly located beneath the boundary fence. It is located in a strip that is approximately 1 m long.                                                                                                                                                                          |

## **Appendix 1 - Photos**



The *Crocosmia x crocosmiiflora* (Montbretia) at Target Note 3.



The *Rhododendron* shrubs at Target Note 5.



The *Crocosmia x crocosmiiflora* (Montbretia) at Target Note 8.



*Cotoneaster* cf. *simonsii* (Himalayan Cotoneaster) at Target Note 6.



*Cotoneaster horizontalis* (Wall Cotoneaster) at Target Note 9.



*Cotoneaster* cf. *simonsii* (Himalayan Cotoneaster) at Target Note 10.



-  Cotoneaster shrubs (dense)
-  Cotoneaster shrub(s)
-  Cotoneaster seedling(s)  
Indicative only - no. of points is not equal to no. of seedlings
-  Rhododendron shrubs (dense)
-  Montbretia (dense)
-  Montbretia
-  Target Note

*Schedule 9 plant mapping overlays Extended Phase 1 Habitat Survey; refer to Figure 1 of Preliminary Ecological Appraisal.*

Mapping is indicative only.

**C489 Schedule 9 Plant Survey at The Bungalow, Henblas Street, Rhostyllen, Wrexham**

**Figure 1 - Location of Schedule 9 Plants**

**Date: 31/08/2022**

**marches ecology**

[www.marchesecology.co.uk](http://www.marchesecology.co.uk)