



Shadow Habitats Regulations Screening Assessment

Site 5, Clywedog Road South, Wrexham

Presented to: **FI Real Estate Management**

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Executive Summary

Scope of Works	Delta-Simons Environmental Consultants Ltd was instructed by FI Real Estate Management ('the Client') to undertake a Shadow Habitats Regulations Screening Assessment of an area of land located at Site 5, Clywedog Road South, Wrexham, LL13 9AE.
Current Site Status	The Site comprises a triangular shaped parcel of land that is predominantly unimproved neutral grassland with a narrow strip of ruderals and scattered scrub running inside the eastern boundary that continue off-Site up to the Client ownership boundary. Beyond the Site boundary to the north and east, beyond a continuation of the grassland, is a strip of semi-natural mixed woodland. South of the Site is semi-improved neutral grassland. Access is off Clywedog Road South.
Proposed Development	The proposed development is for the erection of one industrial warehouse unit with associated HGV loading bays, parking, access and soft landscaping.
Results: European Conservation Sites And International Designated Site	The following European sites and international designated sites were found within 10 km of the Site: • River Dee and Bala Lake Special Area of Conservation (SAC) at a distance of 2.93 km from the Site; • Johnstown Newt Sites SAC 6.0 km from the Site; • Berwyn and South Clwyd Mountains SAC, 9.7 km from the Site; and • Midland Meres & Mosses Phase 2 Ramsar, 4.63 km from the Site.
Impact Pathways Considered	No impact pathways were scoped in for further assessment for potential to cause a Likely Significant Effect either alone or in combination with other developments.
Likely Significant Effect	This HRA Screening report found that without mitigation, there is unlikely to be a significant effect on the qualifying features of the designated sites during either the construction or operational phases of works since all potential impact pathways have been scoped out.
This Shadow Habitats Regulations Assessment Screening Report Executive Summary is intended as a summary of this assessment based on information received by Delta-Simons at the time of production. This Executive Summary should be read in conjunction with the full Report.	

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1.0 Introduction

1.1 Aims and Objectives

Delta-Simons Limited was instructed by FI Real Estate Management ('the Client') to undertake a Shadow Habitats Regulations Screening Assessment at Site 5, Clywedog Road South, Wrexham LL13 9AE ('the Site').

In light of a Court Judgement (known as Dutch N), Natural Resource Wales (NRW) have advised Wrexham County Borough Council (WCBC) as the Local Planning Authority (LPA) that, in light of the unfavourable condition of the River Dee, which is a designated Special Area of Conservation (SAC), before determining a planning application that may give rise to additional phosphates within the catchment, it requires further information to assist it, in its responsibility as the 'Competent Authority' (CA), in carrying out a Habitats Regulations Assessment ('HRA') in accordance with Article 6(3) and 6(4) of the EU Habitats Directive (92/43/EEC).

This document provides information to assist the LPA, WCDC as the CA, in carrying out a Habitats Regulations Screening Assessment ('HRA') in accordance with Article 6(3) and 6(4) of the EU Habitats Directive (92/43/EEC). The primary aim is to provide information to assist the CA to determine whether or not the proposed development of the Site would have a likely significant effect on those Natura 2000 (European conservation sites) and international designated sites that fall within a 10 km radius of the Site, either alone or in combination with other plans or projects. This is equivalent to the requirements of Stage 1 of the HRA process, following the procedures set out in European and current national guidance (European Commission, 2001; Welsh Government, 2021).

1.2 Current Site Status and Development Proposals

The Site is centred at National Grid Reference (NGR) 337080, 349100 and covers an area approximately 3.07 hectares (a). The Site is located within Wrexham Industrial Estate, Wrexham, Wales. The Site comprises a triangular shaped area of land that is predominantly unimproved neutral grassland with a narrow strip of ruderals and scattered scrub running inside the eastern boundary that continue off-Site up to the Client ownership boundary. Beyond the Site boundary to the north and east within the Client ownership, beyond a continuation of the grassland habitat occurring on-Site, is a strip of semi-natural mixed woodland. South of the Site is semi-improved neutral grassland. Access is off Clywedog Road South. The Site location is shown in Figure 1, and the current layout (extracted from the PEA prepared by United Environmental Services) is shown in Figure 2.

The wider Site is bounded to the west by Clywedog Road South, with office type accommodation within Wilkinson Business Park beyond, and commercial premises within Wrexham Industrial Estate to the north. Residential dwellings are found to the east/south-east, and woodland to the south.

The proposed development is for the erection of one industrial warehouse unit with associated HGV loading bays, parking, access and soft landscaping (see Figure 4).

1.3 National Site Networks

European sites comprise SAC's designated under the EU Habitats Directive (Council Directive 92/43/EEC), and Special Protection Area (SPA) designated under the EU Birds Directive (Council Directive 2009/147/EC).

Ramsar sites are wetland sites of international importance designated under the 1971 Ramsar Convention on Wetlands. Although not part of the Natura 2000 network, the UK government has chosen to apply the same assessment procedures to plans and projects affecting Ramsar sites (Welsh Government, 2021), and they, therefore, need to be considered in the HRA process.

Nationally designated sites such as Sites of Scientific Importance, UK National Nature Reserves (NNR) and Local Nature Reserves (LNR) are not considered in this assessment.

1.4 Regulatory Basis of Habitats Regulations Assessment

The Conservation of Habitats and Species Regulations 2017 (as amended), hereafter referred to as the 'Habitats Regulations', implement the provisions of the Habitat Directive described below into UK law.

Article 6 (3) of the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna) states:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'

Article 6 (4) states: *'If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.'*

The Conservation of Habitats and Species Regulations 2017 (as amended), hereafter referred to as the 'Habitats Regulations', implement the provisions of the Habitat Directive in UK law.

The Habitats Regulations consolidate the Conservation (Natural Habitats &c.) Regulations 1994, and Offshore Marine Conservation (Natural Habitats &c.) Regulations 2007.

The Habitats Regulations were amended by the Conservation of Habitats and Species (Amendment) Regulations 2012. This provides for clearer transposition of the provisions of the Birds Directive into UK law, and revokes two Regulations (20 & 22) which duplicate measures to control potentially damaging activities on SSSIs. Regulation 9A sets out the duties of appropriate authorities and nature conservation bodies with respect to the Birds Directive. Regulation 9A (8) provides the legislative basis for considering pollution or deterioration of habitats inside or outside a designated site, transposing Article 4 (4) of the 2009 Birds Directive.

Further changes to the Conservation of Habitats and Species Regulations 2017 (as amended) were made more recently by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. These can be summarised as follows:

- The creation of a national site network within the UK territory comprising the protected sites already designated under the Nature Directives, and any further sites designated under these Regulations;
- The establishment of management objectives for the national site network;
- A duty for appropriate authorities to manage and where necessary adapt the national site network as a whole to achieve the network objectives;
- An amended process for the designation of Special Areas of Conservation (SACs);
- Arrangements for reporting on the implementation of the Regulations, given that the UK no longer provides reports to the European Commission;
- Arrangements replacing the European Commission's functions with regard to the imperative reasons of overriding public interest (IROPI) test where a plan or project affects a priority habitat or species; and
- Arrangements for amending the schedules to the Regulations and the annexes to the Nature Directives that apply to the UK.

Regulation 61 (1) of the Habitats Regulations states:

'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which-

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site, must make an appropriate assessment of the implications for the site in view of that site's conservation objectives.'

The CA in this case is WCBC, as the LPA.

2.0 Methodology

2.1 Technical Approach

This assessment has been produced following the CIEEM guidelines for ecological impact assessment (CIEEM, 2018) and the guidance provided within The Habitats Regulations Assessment Handbook (Tyldesley and Chapman, 2013). As such, the work required has been carried out in accordance with the key principles of Planning Policy Wales (PPW, revised 2021) and Government Circular 05/06 (OPDM, 2005). The conclusions and recommendations are in accordance with current legislation and guidance.

2.2 Personnel

This report was produced by Dr Charlotte Sanderson-Lewis PhD MSc BSc (Hons) MCIEEM who has over fifteen years' experience in ecological consultancy, including producing Habitats Regulations Assessments and nature conservation chapters for Environmental Impact Assessment (EIA). This report was reviewed and authorised by Simon Johnson MSc, MRTPI, AssocRICS who has over 14 years' experience in the built environment profession both as an environmental planning consultant and as a regulator in local government.

2.3 Zone of Influence and Scope of the Assessment

For this Site, it is understood that due to the unfavourable condition of the River Dee SAC, it has been requested by WCBC that further consideration is given to the impacts of any proposals that give rise to additional phosphates within the catchment.

The MAGiC¹ online mapping tool has also been consulted in order to determine the types of development on-Site considered likely to have impacts on nearby internationally important designated sites, using its Site of Special Scientific Interest Impact Risk Zones (SSSI IRZ) tool. The Site falls within several SSSI IRZ that include the following of possible relevance to the proposed development:

- **Discharges:** Any discharge of water or liquid waste of more than 20m³/day to ground (i.e. to seep away) or to surface water, such as a beck or stream; and
- **Water Supply:** Large infrastructure such as warehousing/industry where net additional gross internal floorspace is > 1,000m² or any development needing its own water supply.

In order to assess the impact that the development could have upon nearby international designated sites, the Zone of Influence (ZOI) for the development must be set. This is the area over which 'important ecological features' may be subject to change as a result of the proposed development and associated activities (CIEEM, 2018). The ZOI varies depending on the ecological feature concerned and can extend beyond the site boundary. Where possible, ZOIs were determined using the results of professionally accredited or published scientific studies. Where such studies are not available, the ZOI was determined using the professional judgement of a suitably experienced and qualified ecologist. This is in line with professional guidelines (CIEEM, 2018).

The 'important ecological features' considered for this assessment were the qualifying features, and any additional features listed within the citations for international statutory designated sites within 10 km of the Site's red line boundary, and given the proposed development type, this was considered appropriate.

2.4 Desk Study

2.4.1 Local Planning Policies, Supporting Documents and Other Reports and Plans

Wrexham County Borough Council website (accessed December 2022) was consulted to determine relevant local planning policies, assessments, strategies and supplementary planning documents in order to assist the assessment of impacts upon international statutory designated sites within the Site's ZOI. For the

¹ <https://magic.defra.gov.uk/MagicMap.aspx>

identified international statutory designated sites, an additional literature search was undertaken to research areas where further clarity was needed in order to conduct the assessment, in particular relating to potential for nutrient impacts on the Qualifying Features of the international sites.

2.4.2 Sites for Consideration

The Multi-Agency Geographic Information for the Countryside (MAGiC) online mapping tool (accessed, December 2022) was used to determine a 10 km buffer zone from the Site. All international statutory designated sites within this buffer zone were scoped into this shadow HRA (see Figure 3).

2.4.3 Reasons for Designation

Reasons for designation and a list of qualifying features for the identified international statutory designated sites were taken from online sources (JNCC and NRW/ Natural England webpages). The qualifying features listed were considered to be the 'important ecological features' for consideration within this report, although species listed within the designations, but not listed as qualifying features were also considered.

2.4.4 Determining Impacts

For each identified international statutory designated site, its conservation objectives, the threats and/or pressures for each of its qualifying features, and SSSI condition assessments for each associated management unit were taken into consideration when determining the impacts of the Proposed Development within the Site ZOI (see Figure 3).

Conservation Objectives

For the identified international statutory designated sites, conservation objectives for each site were used to form the basis of the 'screening test' to consider whether there are Likely Significant Effects on the qualifying features of the European site as a result of the proposed development, either alone or in combination with other plans or projects.

Conservation objectives for SPA and SAC sites are defined for each site by NRW and were taken for each site from available online sources.

Threats and Pressures

Threats and/or Pressures for each qualifying feature of each of the identified international statutory designated sites was determined using the SAC/SPA Site Improvement Plans and the sites' associated SSSI Management Unit Condition Assessments, where available.

For the identified international statutory designated sites, NRW Condition Assessments for SSSI Management Units are undertaken to inform both national and European reporting requirements. Reference to condition assessments is recommended in HRA guidelines (Tyldesley & Chapman, 2013) as they provide important information at a finer scale (many international statutory designated sites cover vast areas) which provides essential context to HRA.

When undertaking the assessment of impacts, the Threats and/or Pressures identified were compared to the likely species/habitats present within each SSSI management unit based on the desk study information available, or on-Site, and consideration was given as to whether these Threats and/or Pressures could be triggered by the construction or operational phase of the proposed development due to the presence of Qualifying Features on-Site, or as a result of a pathway for off-Site impacts. On this basis Threats and Pressures were scoped in or out for detailed assessment in Section 4.

2.5 Site Surveys

A Preliminary Ecological Appraisal (PEA) was carried out in August 2021 (United Environmental Services Ltd, 2021). This was used to flag any potential impacts of the proposed development to ecology on-Site. The appraisal also provided an assessment of whether the site was likely to provide any supporting habitat for any of the Qualifying Features within any of the identified international statutory designated sites and,

therefore, whether there could be an indirect effect of the development upon nearby statutory designated sites.

2.6 Assessment of Likely Significant Effect

Taking the site surveys and desk study information into account, an assessment was made as to whether there was a Likely Significant Effect from the proposed development on any of the identified international statutory designated sites' Qualifying Features. An assessment of the project was made alone, and in combination with other plans/projects.

2.6.1 Definition of Likely Significant Effect (LSE)

For an effect to be 'likely', it is sufficient that it should be a possible effect, whose occurrence cannot be excluded on the basis of objective information. This is supported by European case law, in particular the Waddenzee judgement (case C-127/02).

A 'significant' effect is one that would undermine the conservation objectives of the European site; there should be a causal link between the plan or project and the Qualifying Features of the site, which could undermine its conservation objectives (Tyldesley & Chapman, 2013). This excludes effects which could be described as 'de minimis' or 'inconsequential', and which would not be capable of undermining the conservation objectives of the site.

2.6.2 Characterisation of Effects

The following were used when categorising the ecological effects:

- extent
- positive or negative
- direct or indirect
- duration
- timing
- frequency
- reversibility

2.6.3 In-combination Effects

Where required, the potential for in-combination effects with other relevant developments within the local area have also been assessed.

3.0 National Site Network and Ramsar Sites

There are four National Site Network site present within 10 km of the Site, which are River Dee and Bala Lake SAC 2.93 km from the Site at its closest point. Johnstown Newt Sites Special Area of Conservation (SAC) at a distance of 6.0 km from the Site, Berwyn and South Clwyd Mountains SAC, 9.7 km from the Site; and Midland Meres & Mosses Phase 2 Ramsar, 4.63 km from the Site.

3.1 River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (Wales) SAC

The River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid SAC is located approximately 2.9 km south-east from the Site and covers an area of 1271.32 Ha². The general character of the SAC comprises:

- Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins) (4%)
- Salt marshes, Salt pastures, Salt steppes (2%)
- Inland water bodies (Standing water, Running water) (90%)
- Improved grassland (2%)
- Broad-leaved deciduous woodland (2%)

The source of the River Dee lies within Eryri National Park (Snowdonia National Park). Its catchment contains a wide spectrum of landscapes, with the course and topography of the river and its tributaries shaped during the Last Ice Age. The Conservation Objectives only cover parts of the SAC which are in Wales. Further detail is available here³

The SAC is designated for the occurrence of the following Annex I habitats:

- 3260 Watercourses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* Vegetation.

The site is also designated for the occurrence of the following Annex II species:

- 1106 Atlantic salmon *Salmo salar*; and
- 1831 Floating water-plantain *Luronium natans*.

The following Annex II species are also present as a qualifying feature, but not a primary reason for the selection of the site:

- 1095 Sea lamprey *Petromyzon marinus*;
- 1096 Brook lamprey *Lampetra planeri*;
- 1099 River Lamprey *Lampetra fluviatilis*;
- 1163 Bullhead *Cottus gobio*; and
- 1355 European otter *Lutra lutra*.

Conservation Objectives

Conservation Objective for Feature 1: Watercourses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation

² <https://sac.jncc.gov.uk/site/UK0030252>

³ Core Management Plan Including Conservation Objectives For River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC (https://naturalresources.wales/media/673374/River_De_Bala_Lake_32_Plan.pdf)

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

The conservation objective for the watercourse as defined above must be met.

The extent of this feature within its potential range in this SAC should be stable or increasing

The extent of the sub-communities that are represented within this feature should be stable or increasing.

The conservation status of the feature's typical species should be favourable.

All known, controllable factors, affecting the achievement of these conditions are under control (many factors may be unknown or beyond human control).

Conservation Objective for Feature 2: Atlantic salmon

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- *The parameters defined in the vision for the watercourse as defined above must be met*
- *The SAC feature populations will be stable or increasing over the long term.*
- *The natural range of the features in the SAC is neither being reduced nor is likely to be reduced for the foreseeable future.*
- *There will be no reduction in the area or quality of habitat for the feature populations in the SAC on a long-term basis*
- *All known, controllable factors, affecting the achievement of these conditions are under control (many factors may be unknown or beyond human control).*

Conservation Objective for Feature 3: Floating water-plantain. The conservation objective for the lake water body as defined in the conservation objective for features 9 and 10 must be met.

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- *There will be no contraction of the current *L. natans* extent and distribution, and the populations will be viable throughout their current distribution & will be able to maintain themselves on a long-term basis. Each *L. natans* population must be able to complete sexual and/or vegetative reproduction successfully.*
- *The lake will have sufficient habitat to support existing *L. natans* populations within their current distribution and for future expansion.*
- *All factors affecting the achievement of these conditions are under control.*

Conservation Objective for Features 4, 5, and 6: Sea lamprey, Brook lamprey, River lamprey

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- *The parameters defined in the vision for the watercourse as defined above must be met.*
- *The SAC feature populations will be stable or increasing over the long term.*
- *The natural range of the features in the SAC is neither being reduced nor is likely to be reduced for the foreseeable future.*
- *There will be no reduction in the area or quality of habitat for the feature populations in the SAC on a long-term basis.*

- *All factors affecting the achievement of these conditions are under control.*

Conservation Objective for Feature 7: Bullhead

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- *The parameters defined in the vision for the watercourse as defined above must be met.*
- *The SAC feature populations will be stable or increasing over the long term.*
- *The natural range of the features in the SAC is neither being reduced nor is likely to be reduced for the foreseeable future.*
- *There will be no reduction in the area or quality of habitat for the feature populations in the SAC on a long-term basis.*
- *All factors affecting the achievement of these conditions are under control.*

Conservation Objective for Feature 8: European otter

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- *The parameters defined in the vision for the watercourse as defined above must be met.*
- *The SAC otter population is stable or increasing over the long term, both within the SAC and within its catchment.*
- *There will be no loss of otter breeding or resting sites other than by natural means (such as naturally occurring river processes) within the SAC or its catchment.*
- *The number of potential resting sites within the SAC will not be a factor limiting that limits the otter population's size or extent.*
- *There should be no reduction of fish biomass within the SAC or its tributaries except for that attributable to natural fluctuations.*
- *There should be no loss of amphibian habitat likely to provide a source of prey for members of the SAC otter population.*
- *The potential range of otters in the within the SAC or its catchment is neither being reduced nor is likely to be reduced for the foreseeable future.*
- *All known or potential access or dispersal routes within the catchment for otters that might be considered part of the SAC population should be maintained such that their function is not impaired including the incorporation of measures or features required to avoid disturbance.*
- *Off site habitats likely to function as 'stepping stones' within the catchment for members of the SAC otter population will be maintained for migration, dispersal, foraging and genetic exchange purposes.*
- *All man-made structures within or likely to be used by otters from the SAC population must incorporate effective measures to facilitate the safe movement and dispersal of otters.*
- *All known, controllable factors, affecting the achievement of these conditions are under control (many factors may be unknown or beyond human control).*

3.2 Johnstown Newt Sites (Wales) SAC

The Johnstown Newt Sites SAC is located approximately 6 km south-west from the Site and covers an area of 69.1 Ha. The Johnstown Newts Sites SAC is notified as one component SSSI: Stryd Las a'r Hafod SSSI. It is

of special interest for its population of the great crested newt *Triturus cristatus*. Further detail is available [here](#)⁴

The SAC is designated for the occurrence of the following Annex II species:

- 1166 (code) Great crested newt

Conservation Objectives

Conservation Objective for Feature 1: Great crested newt

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- No less than 300 great crested newts will be present on the site
- At least 30 display/breeding ponds will be found throughout the entire site
- Great crested newt larvae will be found in 7 or more of the breeding ponds
- Half of the display/breeding ponds on the site will have a water depth of 10 cm or more during the summer months.
- Native macrophytes will cover at least half of the pond surface yet some of the water surface will still remain open.
- Aquatic marginal vegetation will be present around the ponds
- Breeding/display ponds will not be heavily shaded by surrounding vegetation
- Algal blooms and surface sheens will be absent from display/breeding ponds
- Fish will not be present in breeding/display ponds which support great crested newts
- Only small numbers of water and wildfowl will be seen on the ponds
- The terrestrial habitat surrounding breeding ponds will comprise of refuge areas for newts, foraging areas, areas of hibernacula and corridors which will aid the dispersal of great crested newts
- Off site habitats that function as stepping stone or corridors located between SAC compartments will be maintained for migration, dispersal, foraging and genetic exchange purposes
- Off-site features that impact on successful dispersal, such as roadside gully-pots, will not be subject to future construction
- Non-native aquatic species will not be present
- Amphibian *chytridiomycosis* will not be present

All factors affecting the achievement of the foregoing conditions are under control

3.3 Berwyn a Mynyddoedd De Clwyd / Berwyn and South Clwyd Mountains (Wales) SAC

The Berwyn a Mynyddoedd De Clwyd / Berwyn and South Clwyd Mountains (Wales) SAC is located approximately 9.7 km west from the Site and covers an area of 27,132 Ha. The large upland site is the largest blanket bog and European dry heath in Wales and comprises of three discrete sites, Berwyn SSSI, Llandegla Moor SSSI and Ruabon and Llantysilio Mountains and Minera SSSI. These sites are predominantly a mixture

⁴ Core Management Plan Including Conservation Objectives For Johnstown Newt Sites Special Area of Conservation (SAC) (https://naturalresources.wales/media/672594/Johnstown%20Newt%20Site%20Management%20Plan%20April%202008%20English_.pdf)

of dry heath and blanket bog vegetation and can together be described as upland moorland. Further detail is available here⁵.

The SAC is designated for the occurrence of the following Annex I habitats:

- 7130 Blanket bogs *Priority feature
- 4030 European dry heaths

The following Annex I habitats are also present as a qualifying feature, but not a primary reason for the selection of the site:

- 6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates *Festuco-Brometalia*
- 7140 Transition mires and quaking bogs
- 8120 Calcareous and calcshist screes of the montane to alpine levels *Thlaspietea rotundifolii*
- 8210 Calcareous rocky slopes with chasmophytic vegetation

Conservation Objectives

Conservation Objective for Feature 1: Blanket bogs * Priority feature

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- There will be no measurable decline in blanket bog; the area of the habitat must be stable or increasing.
- Dry blanket bog on moisture shedding ridges and slopes will be defined as ericoid (typically *Calluna*) dominated, with clearly subordinate *Erica tetralix*. *Empetrum nigrum*, *Vaccinium vitis-idaea* and/or *V. myrtillus* will be present at high frequency. *Eriophorum vaginatum* typically constant but sometimes only at low cover – other graminoids are typically scarce. *Vaccinium oxycoccus* may sprawl over the thick bryophyte mat but other elements of “wet” bog such as *Narthecium* and *Drosera* are characteristically sparse. Hypnoid mosses (typically *Hypnum jutlandicum* and *Pleurozium schreberi*) often the dominant bryophyte component, and *Sphagna* where present most often represented by *Sphagnum capillifolium*.
- Wet blanket bog on plateaux and col areas is characterised by a more even balance between ericoids and graminoids. *Eriophorum vaginatum* generally achieves a higher cover than in drier situations and *E. angustifolium* is constant. Representation of *Molinia caerulea* and *Trichophorum cespitosum* is variable according to past management and hydrology. Smaller elements such as *Vaccinium oxycoccus*, *Narthecium* and *Drosera* are typically present. Hypnoids and *Sphagnum capillifolium* may still comprise the main bryophyte element, but often joined by species of *Sphagnum* sect. *Sphagnum*.
- All areas of blanket bog should exhibit a high water table just below the surface of the ground for the majority of the year and this consistent with continued peat formation.
- In areas of wet bog in particular, the vegetation should develop or retain an irregular pattern with drier hummocks and wetter hollows.
- The quality of blanket bog (including in terms of ecological structure and function) must be maintained.
- Areas with habitats classed as degraded or modified blanket bog and bare peat should be restored to a more sustainable state by encouraging the growth of typical blanket bog vegetation and the blocking of drainage ditches.

⁵ Core Management Plan Including Conservation Objectives For Berwyn & South Clwyd Mountains SAC & Berwyn SPA
([https://naturalresources.wales/media/670888/Berwyn%20man%20plan%20\(E\)%20\(table%20revis%2010.09.09\).pdf](https://naturalresources.wales/media/670888/Berwyn%20man%20plan%20(E)%20(table%20revis%2010.09.09).pdf))

- Burning blanket bog will be discouraged as it retards the development of hummock & hollows as well as the development of more sensitive Sphagna.
- There should be no moor drains or grips draining the peat body.
- There should be no evidence of damage caused, for example, by active drainage or burning.
- Any typical species must also be at FCS, as defined below.
- Non-native plant species should be absent.
- There should be no decline in the range or abundance of characteristic plant species and vegetation communities.
- All factors affecting the achievement of these conditions are under control.

Conservation Objective for Feature 2: European dry heaths

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- There will be no measurable decline of dry heath area; the area of the habitat must be stable or increasing.
- The European dry heath consists principally of NVC type H12 *Calluna vulgaris*-*Vaccinium myrtillus* heath, with frequent *Empetrum nigrum* and occasional *Vaccinium vitis-idaea*. Other heath vegetation present includes areas of H18 *Vaccinium myrtillus*-*Deschampsia flexuosa* heath and in some areas stands of damp H21 *Calluna vulgaris*-*Vaccinium myrtillus*-*Sphagnum capillifolium* heath. These latter heaths occur in an intermediate position between the drier heaths and blanket mire and support occasional plants of *Listera cordata*.
- Its quality (including in terms of ecological structure and function) must be being maintained.
- The areas of heath vegetation should be retained and where possible permitted to re-establish on areas modified or degraded as a result of agricultural improvement, or through inappropriate management.
- The dry heathland should have a diverse age structure in the heather and other shrubby plants.
- Management will ensure the development of a mosaic of age structures through pioneer, building, mature to degenerate heather with at least 10% identified for no-management and allowed to develop through to maturity.
- Management will not be undertaken within sensitive habitat areas.
- Some native scrub development will be acceptable up to 10% cover with higher densities, up to 20% within e.g. identified black grouse management zones.
- Heather and other plants should not exhibit signs of suppressed growth forms due to grazing.
- There should be areas of long heather providing nesting habitat for ground nesting birds such as grouse, merlin and hen harriers; and areas of lower young heather, and wet flushes where birds can feed on heather shoots and invertebrates.
- Non-native plant species should be absent.
- Any typical species must also be at FCS, as defined below.
- All factors affecting the achievement of these conditions are under control.

Conservation Objective for Feature 3: Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*)

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- The extent of the calcareous and neutral grasslands should be maintained or increased in size at the expense of bracken, scrub and other more improved grasslands. No loss in extent is acceptable.
- The calcareous grassland varies floristically. At low altitudes the sward of the calcareous grassland should be rich in calcicolous species such as *Carlina vulgare*, *Briza media* and *Sanguisorba minor*. Locally scarce species such as *Gymnadenia conopsea* and *Blackstonia perfoliata* should also be present. At higher elevations the calcareous sward has more acid species present. Along with the typical indicator species of calcareous grassland, acid loving species such as *Agrostis tenuis* and *Potentilla erecta* are regular. Within the sward, fine leaved grasses and herb species like *Briza media*, *Carlina vulgaris* and *Thymus polytrichus* will be regular, although due to the upland nature of the site other more typically acid-loving herbs like heath *Galium saxatile* and *Campanula rotundifolia* may commonly occur. Though described as grasslands, more than half of the ground cover will consist of herbaceous species.
- The limestone grassland areas will have a wide variety of plant communities with the limestone grasslands having those typical of thin, lime rich soils.
- Grazing will be at levels that allow plants to flower and set seed whilst preventing the spread of trees and scrub.
- Bracken will only be found in a few isolated patches at the perimeters.
- Within the sward tree and scrub seedlings, and robust or tussock forming grasses such as *Dactylis glomerata*, and *Deschampsia cespitosa* are uncommon or at low cover. While weeds and other agriculturally favoured species such as *Lolium perenne*, *Urtica dioica*, *Cirsium arvensis* and *C. vulgare* are rare or absent.
- Introduced species should be absent and control measures should be taken if any such species becomes established.
- High levels of grazing results in localised soil erosion on steeper parts of the escarpment, which degrades some areas. However, grazing pressure should be sufficient to open small transient patches of bare ground within the sward providing a seed bed for the vascular plant species and suitable habitat for the diminutive bryophytes, macro-lichens and short-lived vascular plant species which are particularly characteristic of limestone grassland on the steeper, more exposed slopes.
- On deeper soils south of the quarry acid grassland develops and in places forms a mosaic of habitats with the calcareous grassland. On these soils the spread of gorse and bracken should be controlled.
- All factors affecting the achievement of these conditions are under control.

Conservation Objective for Feature 4: Transition mires and quaking bogs

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- There will be no measurable decline in Transition mires and quaking bogs; the area of the habitat must be stable or increasing.
- Typically characterised by a range of low-growing sedges over an extensive carpet of Sphagnum bog mosses, accompanied by other mosses, rushes and some scattered herbs.
- The water table is above the surface of the substrate, giving rise to characteristic floating mats of vegetation.

- The vegetation normally has intimate mixtures of species considered to be acid-lovers and others thought of as lime-lovers.
- There should be no moor drains or grips draining the mire.
- There will be no threats to the transition mire habitat from burning or grazing.
- There is no significant input of nutrient-rich water from ditches and surrounding land.
- All factors affecting the achievement of these conditions are under control.

Conservation Objective for Feature 5: Calcareous and calcshist scree of the montane to alpine levels (*Thlaspietea rotundifolii*)

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- There will be no measurable decline of habitat, the area of the habitat must be stable but due to its nature an increase in extent is unlikely.
- The feature is typically characterised by sensitive pioneer species including maidenhair spleenwort, and bryophytes that are able to colonise the scree, as the crags and ledges provide shelter from grazing and frost action.
- The flora representative of this feature reflects the base rich nature of the rocks including limestone, calcareous-schists and the more basic igneous rocks such as serpentine and basalt.
- The scree community is important for the rich fern flora and acts as refugia for a number of rare species.
- Light grazing will prevent the succession to scrub and minimise colonisation by species such as ash and hazel whilst not damaging the feature through overgrazing.
- The scree will remain largely undisturbed by human activity and the depositional slopes will continue to accumulate small amounts of scree. The vegetation is only likely to be truly representative of this feature where it occurs on stable scree on less steep slopes where the vegetation can accumulate.
- The existing diversity of species in each of the above communities should be maintained.
- There will be no reduction in extent as a result of undesirable human activity such as afforestation, quarrying, climbing or civil engineering works.
- The use of herbicides, such as Asulox to control the spread of bracken, should be restricted to areas where they will not adversely impact the feature.
- Only native species should be present.
- All factors affecting the achievement of these conditions are under control.

Conservation Objective for Feature 6: Calcareous rocky slopes with chasmophytic vegetation

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- There will be no measurable loss of habitat, the area of the habitat must be stable but due to its nature an increase in extent is unlikely.
- The chasmophytic vegetation will consist of plant communities colonising cracks and fissures of rock faces. The type of plant communities developing will be largely determined by the base-status of the rock face.
- The chasmophytic vegetation is usually dominated by ferns such as *Asplenium ruta-muraria* and small herbs such as *Thymus praecox* and *Hieracium* spp. The inaccessibility of rock habitats to grazing animals,

especially rock ledges provides a refuge for many vascular plants that are sensitive to grazing, including numerous local and rare species.

- Bryophytes and crustose lichens should form a dominant component in crevices but are also found on open rock surfaces where there is a lack of competition from vascular plants. Ledge communities are recognised as part of the feature on the site due to the spectacular stepped topography.
- Grass benches should be floristically diverse supporting species characteristic of the feature such as *Campanula rotundifolia*, *Centaurea nigra* and *Dryopteris* spp.
- The existing diversity of species in each of the above communities should be maintained.
- Only native species should be present.
- Chasmophytic vegetation and grass benches vegetation will not exhibit signs of overgrazing.
- There will be no reduction in extent as a result of undesirable activities such as quarrying.
- Small scale excavations may enhance the interest of the site by providing additional exposures but would be deleterious to the highly vulnerable scree and clitter slopes. 11. The use of herbicides, such as Asulox, to control the spread of bracken should be restricted to areas where they will not adversely impact the feature.
- All factors affecting the achievement of these conditions are under control.

3.4 Midland Meres & Mosses Phase 2 (Wales) Ramsar

The Ramsar site is located 4.6 km north from the Site and covers an area of 1,588 Ha. The Midland Meres & Mosses Phase 2 is designated under Ramsar criterion 1 and 2. Further detail is available here⁶

Ramsar Criterion 1

- The site comprises a diverse range of habitats from open water to raised bog.

Ramsar Criterion 2

- Supports a number of rare species of plants associated with wetlands, including the nationally scarce cowbane *Cicuta virosa* and, elongated sedge *Carex elongata*. Also present are the nationally scarce bryophytes *Dicranum affine* and *Sphagnum pulchrum*.
- Also supports an assemblage of invertebrates including several rare species. There are 16 species of British Red Data Book insect listed for this site including the following endangered species: the moth *Glyptotendys lathamella*, the caddisfly *Hagenella clathrata* and the sawfly *Trichiosoma vitellinae*.

3.5 Ecology and Sensitivity of Qualifying Features

3.5.1 Priority Improvement Plan Sensitivity Matrix

It has not been possible to prepare a sensitivity matrix since the Prioritised Improvement Plans (PIP) for The River Dee and Bala Lake SAC; Johnstown Newt Sites SAC, Berwyn and South Clwyd Mountains SAC produced by NRW, were not available online and within Natural England's Site Improvement Plan for The River Dee and Bala Lake SAC (SIP, 2015) it states "Issues identified affecting this site can be found in the Prioritised Improvement Plan (PIP) produced by NRW".

⁶ <https://rsis.ramsar.org/ris/891>

⁷ Natural England (2015). Site Improvement Plan for The River Dee and Bala Lake SAC

3.6 Site Condition

Condition assessment of European sites is undertaken by NRW as part of Common Standards Monitoring of European site qualifying features and SSSI qualifying interests. These are provided within the Core Management Plan available at the level of the SSSI management unit.

The closest SSSI units to The River Dee and Bala Lake SPA are contiguous with it, and comprise the Afon Dyfrdwy (River Dee) SSSI (NRW management units, or parts of, 4, 5, 6, 7, 8, 15, 16, 17, 2, 3 and upstream half of 4). However, following a trawl of the internet it was concluded that information at the unit level was not available for any SSSI units within the 10 km search area that fall under NRW's remit.

A Management Report prepared by Jacobs in 2013⁸ on the River Dee Restoration indicates that at that time of the Report, the SSSI units and Condition Assessment undertaken by Natural England for units 1, 3, 4 and 5 indicate that three of the four are in an unfavourable status due to pollution from agriculture / runoff and water pollution discharge (phosphate), and inappropriate structures such as dams and weirs resulting in poor results for macrophyte and salmon and bullhead targets. The condition of the Welsh SSSI had not been assessed on a unit basis in 2013, however, many of the SSSI features are also SAC features and the condition has been assessed for them with most of the management units in unfavourable condition.

Status of the features within The River Dee and Bala Lake SAC is taken from the Core Management Plan as follows:

- Feature 1: Watercourses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation- Unfavourable Unclassified. Condition assessment based on a limited dataset.
- Feature 2: Atlantic salmon -Unfavourable. Failure due mostly to water quality failure, though also a lack of sustainable exploitation and management objectives not met.
- Feature 3: Floating water-plantain – Favourable Unclassified. Threats from physical damage to floating plants from motorised craft, dredging of lake bottom sediment and the invasive Canadian pondweed *Eloдея canadensis*.
- Feature 4: Sea lamprey: Unfavourable Unclassified – limited information available on this species but anticipated physical barriers such as weirs limit migration, entrainment in water abstraction directly impacts on population dynamics and fish stocking.
- Feature 5: Brook lamprey: Unfavourable Unclassified – limited information available on this species but anticipated physical barriers such as weirs limit migration, entrainment in water abstraction directly impacts on population dynamics and fish stocking.
- Feature 6: River lamprey: Unfavourable Unclassified – limited information available on this species but anticipated physical barriers such as weirs limit migration, entrainment in water abstraction directly impacts on population dynamics and fish stocking.
- Feature 7: Bullhead: Unfavourable Unclassified -failure due to water quality.
- Feature 8: Otter: Favourable Unclassified – population status not known.

Status of the features within The Johnstown Newt Sites SAC is taken from the Core Management Plan as follows:

- Feature 1: GCNs – Unfavourable, declining (2007). Great crested newts are found in low numbers and great crested newt larvae are only found in a small number of ponds. The principal reasons for this are, the presence of fish in breeding ponds, pond pollution, and *Crassula helmsii* (non-native invasive weed) coving large areas of the pond surfaces.

⁸ Information Sheet on Ramsar Wetlands (RIS) (<https://jncc.gov.uk/jncc-assets/RIS/UK11080.pdf>) Jacobs (2013) River Dee/ Afon Dyfrdwy SSSI Restoration Management Report

It is not possible to determine the status of the features within Midland Meres & Mosses Phase 2 as there is no Core Management Plan for the Ramsar.

Status of the features within The Berwyn and South Clwyd Mountains SAC is taken from the Core Management Plan as follows:

- Feature 1: Blanket bogs – Unfavourable, declining. The main causes of poor condition class in 2005 were inappropriate grazing, burning and drainage of the feature.
- Feature 2: European Dry Heaths- Unfavourable, declining. The main causes of poor condition class in 2005 were lack of species diversity particularly due to fragmentation of the habitat and reversion to grassland as a result of years of overgrazing.
- Feature 3: Semi-natural dry grasslands and scrubland facies: on calcareous substrates- Unfavourable. Based on a monitoring programme undertaken in 2005 by CCW's SAC monitoring officer. The majority of the monitoring plots were found to be unfavourable due to the presence of nettles and thistles. These grasslands are more heavily grazed than the surrounding heath and this is reflected in the large numbers of sheep, dung, nettles and thistles found within the feature. 60% of the sampling plots located throughout this feature were found to fail on account of the presence of nettles and thistles indicating that the grazing levels currently being practised are not compatible with achieving favourable condition of this feature.
- Feature 4: Transition mires and quaking bogs- Unfavourable. Drainage and burning / grazing are threats.
- Feature 5: Calcareous and calcshist screes of the montane to alpine levels- Unfavourable. Heavy grazing.
- Feature 6: Calcareous rocky slopes with chasmophytic vegetation. Unfavourable. Grazing is highlighted as the main contributing factor to the poor quality of the chasmophytic vegetation.
- Feature 7: Hen harrier- Unfavourable. Causes of breeding failure were recorded as nest predation, poor weather or unavailability of food (circumstantial evidence) or nest abandonment due to unidentified reasons.
- Feature 8: Merlin- Unfavourable. Causes of breeding failure were recorded as nest predation, poor weather or unavailability of food (circumstantial evidence) or unidentified reasons such as nest abandonment due to possible disturbance.
- Feature 9: Peregrine- Unfavourable. Causes of breeding failure were recorded as nest predation, poor weather or unavailability of food (circumstantial evidence) or unidentified reasons such as nest abandonment and in occasional cases nests theft.
- Feature 10: Red kite- Unknown, not subject to any monitoring programmes on the Berwyn Special Protection Area (SPA).

4.0 Ecological Impacts and Likely Significant Effect

4.1 Description of Development

It is understood that the proposed development is for the erection of one industrial warehouse unit with associated HGV loading bays, parking, access and soft landscaping (see Figure 4).

4.2 Summary of Site Ecology

4.2.1 Local Ecological Context

The Site is centred at National Grid Reference (NGR) 337080, 349100 and covers an area approximately 3.07 hectares (Ha). The Site is located within Wrexham Industrial Estate, Wrexham, Wales. The Site comprises a triangular shaped area of land that is predominantly unimproved neutral grassland with a narrow strip of ruderals and scattered scrub running inside the eastern boundary that continue off-Site up to the Client ownership boundary. Beyond the Site boundary to the north and east within the Client ownership, beyond a continuation of the grassland habitat occurring on-Site, is a strip of semi-natural mixed woodland. South of the Site is semi-improved neutral grassland. Access is off Clywedog Road South. The Site location is shown in Figure 1.

The wider Site is bounded to the west by Clywedog Road South, with office type accommodation within Wilkinson Business Park beyond, and commercial premises within Wrexham Industrial Estate to the north. Residential dwellings are found to the east/south-east, and woodland to the south.

The current Site layout is shown in Figure 2 (extracted from the PEA prepared by United Environmental Services).

4.3 Potential Impacts Scoped Out for Further Assessment

4.3.1 Potential to Support Qualifying Species of The River Dee and Bala Lake SAC

The Sites potential to support SAC qualifying features and noteworthy fauna was assessed by United Environmental Services by means of a PEA undertaken in August 2021.

The Site comprised solely of terrestrial habitats, predominantly unimproved neutral grassland. No qualifying features of the River Dee and Bala Lake SAC were recorded on-Site, and the habitats on the Site were not suitable for use by the qualifying species.

4.3.2 Potential Threats/Pressures to The River Dee and Bala Lake SAC

- Nutrient Input

Following a review of the Nutrient Neutrality Statement prepared by Delta-Simons (November 2022), together with a review of the WCBC website, and specifically, the advice relating to new river phosphate level targets⁹, accessed December 2022), any adverse impact that the proposed development could have through increasing phosphate levels within the catchment of the River Dee SAC has been scoped out of this report for the following reasons:

- NRW states the following non-residential developments can result in an increase to phosphorous loading: 'Self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfasts, self-catering holiday facilities, camping and caravan sites.' Consequently, developments where overnight accommodation is provided. The proposed development does not fall into this category.
- According to WCBC, the types of development that may be affected by phosphorous river levels and require use of a Phosphate Budget Calculator include:

⁹ <https://www.wrexham.gov.uk/service/development-plans-and-other-planning-policy/new-river-phosphate-level-targets>

- 'New residential units including homes, gypsy and traveller sites/pitches;
- Tourism attractions and commercial developments where overnight accommodation is provided;
- Agricultural development, including prior notifications (developments that don't require planning permission, but where we need to check that it is allowed) including additional barns and slurry stores likely to lead to increased herds;
- Prior notifications for change of use of office to homes and agricultural buildings to homes;
- Operations which generate phosphate such as fisheries and car washing facilities.'

Given that the proposed development is for an industrial warehouse unit, it will not generate an increase in phosphate as there is no overnight accommodation requirement as part of the proposals. The proposals would not increase the local population and, therefore, employees and their associated phosphate loading have already been accounted for in their own residential setting.

The Delta-Simons Nutrient Neutrality Statement, therefore, concluded that "The NRW and WCBC Nutrient Neutrality Guidance states that the types of development that require use of a Phosphate Budget Calculator do not include commercial developments which do not include overnight accommodation. Therefore, it can be assumed that the proposed development is considered nutrient neutral."

- Water Quantity and Quality

The designated business use for the Proposed Development is for industrial use (warehousing) and, therefore, during the operational phase, it is considered unlikely to lead to an increase in demand for water as there are no abstraction requirements. Runoff due to an increase in hardstanding and potential contamination of the water supply from runoff could lead to pollution. However, the Proposed Development includes landscaping, SuDS and a connection to the local sewerage system (within Clwedog Road South) therefore off-Site pollution is considered unlikely. In addition, whilst there is a surface water hydrological connection between the Site and the River Dee and Bala Lake, the Drainage Strategy Report (Barnsley Marshall Ltd. 2021) states that the SuDS drainage is adequate in addressing pollution control and water quality as indicated in Table 6 on page 19 of that report. This Project is, therefore, screened out for impact pathways relating to hydrological changes in quality and quantity.

4.3.2 Potential to Support Qualifying Species of the Berwyn and South Clwyd Mountains SAC

No qualifying features of the Berwyn and South Clwyd Mountains SAC were recorded on-Site, and the habitats on the Site were not suitable for use by the qualifying species. It is of particular relevance to note that the Site is not functionally linked to this European site, such that development of the Site would not cause direct disturbance to the features for which the SAC is designated.

4.3.4 Potential Threat/Pressures to Berwyn and South Clwyd Mountains SAC

From a review of the Conservation Objectives for the Berwyn and South Clwyd Mountains SAC, any Threats / Pressures for which management is required to correct / alleviate, have been scoped out for detailed assessment as the proposed development is not expected to have any effect upon them.

4.3.5 Potential to Support Qualifying Species of the Midland Meres & Mosses Phase 2 Ramsar

No qualifying features of the Midland Meres & Mosses Phase 2 Ramsar were recorded on-Site, and the habitats on the Site were not suitable for use by the qualifying species. In terms of HRA, it is of particular relevance to note that the Site is not functionally linked to this international site, such that development of the Site would not cause direct disturbance to this feature for which the Ramsar is designated.

4.3.6 Potential Threats/Pressures to Midland Meres & Mosses Phase 2 Ramsar

From a review of the Conservation Objectives for Midland Meres & Mosses Phase 2 Ramsar, any Threats / Pressures for which management is required to correct / alleviate, have been scoped out for detailed assessment as the proposed development is not expected to have any effect upon them.

4.3.7 Potential to Support Qualifying Species of Johnstown Newt Sites SAC

The GCN is the qualifying feature for Johnstown Newt Sites SAC. Whilst the Site offers suitable terrestrial habitat to support GCNs, it states in the PEA that *"due to the lack of aquatic habitats present within the proposed development site and highly unlikely presence of GCNs within the vicinity of the site, it is considered highly unlikely that GCNs will be adversely affected by the proposed development"*. However, the WCBC Ecologist, Emma Broad, in her consultation response (21/09/22) states that *"The application site is within 250m of recorded great crested newt. The report is contradictory in whether a derogation licence will be applied for. Given the large size of the development and excellent habitat on site, I do not believe RAMS to be appropriate and a full derogation licence should be applied for."* Therefore, for the purposes of this report it must be assumed that GCNs likely occur on-Site. However, in terms of HRA, it is of particular relevance to note that the Site is not functionally linked to this European site, such that development of the Site would not cause direct or indirect disturbance to this feature for which the SAC is designated.

4.3.8 Potential Threats/Pressures to Johnstown Newt Sites SAC

From a review of the Conservation Objectives for Johnstown Newt Sites SAC, any Threats / Pressures for which management is required to correct / alleviate, have been scoped out for detailed assessment as the proposed development is not expected to have any effect upon them.

4.4 Screening for Likely Significant Effect

Given the type and location of the proposed development and the identified pressures and threats of the European sites through the Conservation Objectives given, no impact is expected on the River Dee and Bala Lake SAC, Berwyn and South Clwyd Mountains SAC, Midland Meres & Mosses Phase 2 Ramsar or Johnstown Newt Sites SAC as a result of the proposed development.

5.0 Conclusions and Recommendation

5.1 Likely Significant Effect

The development has been considered in terms of its scale, nature and location in relation to the River Dee and Bala Lake SAC, Berwyn and South Clwyd Mountains SAC, Midland Meres & Mosses Phase 2 Ramsar and Johnstown Newt Sites SAC as a result of the proposed development.

The ecological requirements and key vulnerabilities of the qualifying features for each of these statutory designated sites have been considered and assessed against the potential ecological impacts of the development and all impact pathways have been scoped out.

The conclusion of the assessment suggests that the Competent Authority could conclude that, without mitigation in place, there is unlikely to be a significant effect on the qualifying features of the designated sites since all potential impact pathways have been scoped out.

5.2 Recommendations

Should the CA agree with this conclusion, this document could provide the basis for their completion of a Stage 1 Habitats Regulations Assessment with respect to the proposed development.

6.0 Disclaimer

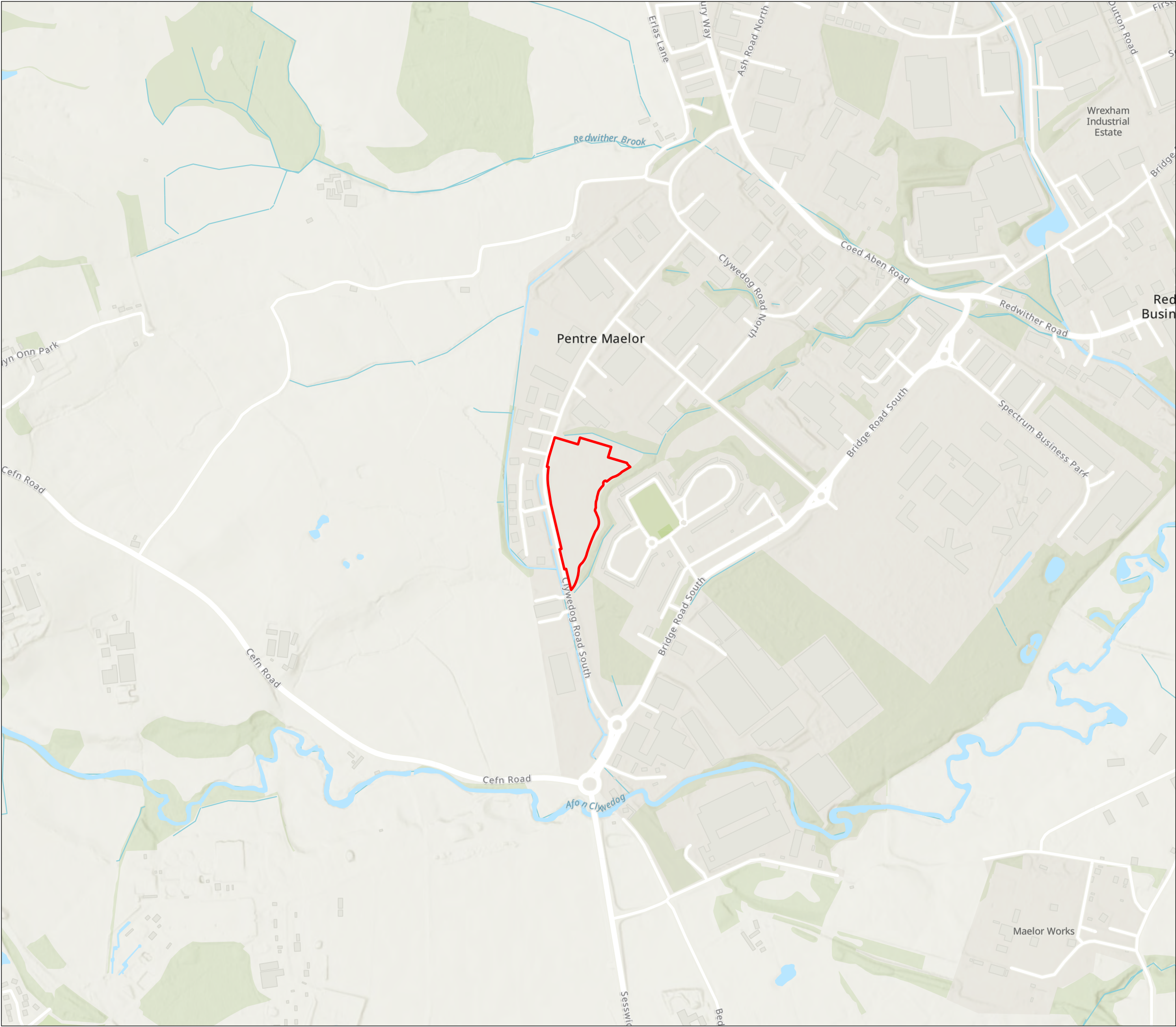
The recommendations contained in this Report represent Delta-Simons' professional opinions, based upon the information referred to in Section 1.0 of this Report, exercising the duty of care required of an experienced Ecology Consultant. Delta-Simons does not warrant or guarantee that the Site is free of Bats or other protected species.

The behaviour of animals can be unpredictable and may not conform to characteristics recorded in current scientific literature. This Report, therefore, cannot predict with absolute certainty that animal species will or will not occur in apparently suitable locations or habitats or that they will not occur in locations or habitats that appear unsuitable.

No part of the survey included an assessment of the materials and conditions of any buildings. No part of the survey included an asbestos assessment, nor did it represent an appraisal of other deleterious materials or hazardous substances.

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Figure 1 – Site Location Map



Legend

 Site boundary

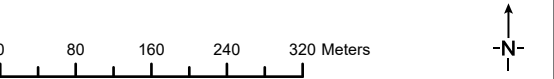
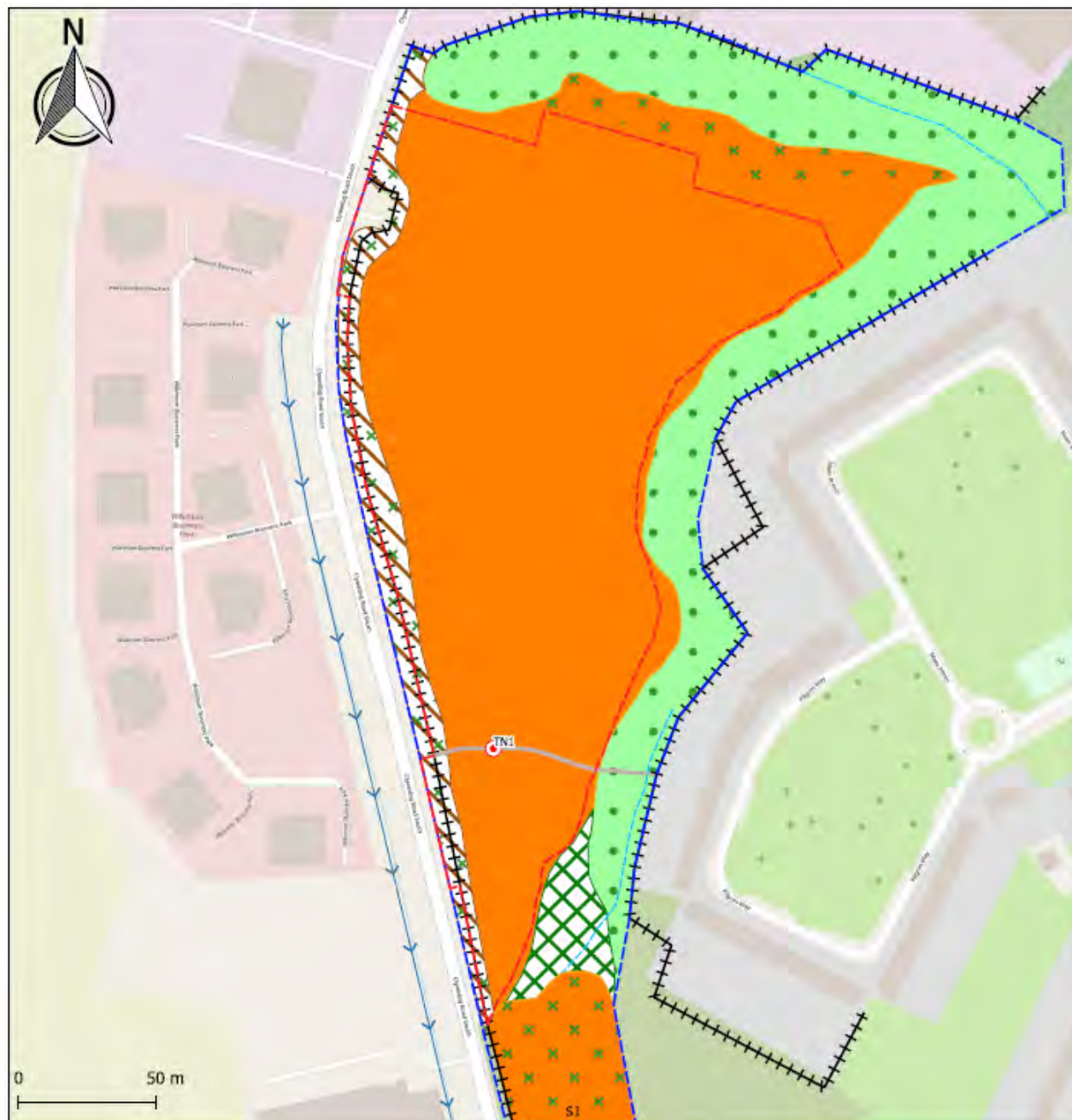


Figure	Site Location Plan		
Job	Site 5, Clywedog Road South, Wrexham		
Client	FI Real Estate Management		
Figure No.	1	Revision	A
		Date	16/12/2022
Drawn	KH	Checked	RS
		Scale	1:8,000 @ A3
Job No.	87883.553493		Central GR
			337107E 349039N



Figure 2 – Phase 1 Habitat Plan



KEY:

Development Boundary

Site Ownership Boundary

A1.3.1 - Mixed woodland - semi-natural

A2.1 - Scrub - dense/continuous

A2.2 - Scrub - scattered

B2.1 - Unimproved neutral grassland

S1 B2.2 - Semi-improved neutral grassland

C3.1 - Ruderal tall herb and fern

G2 - Running Water

J2.4 - Fence

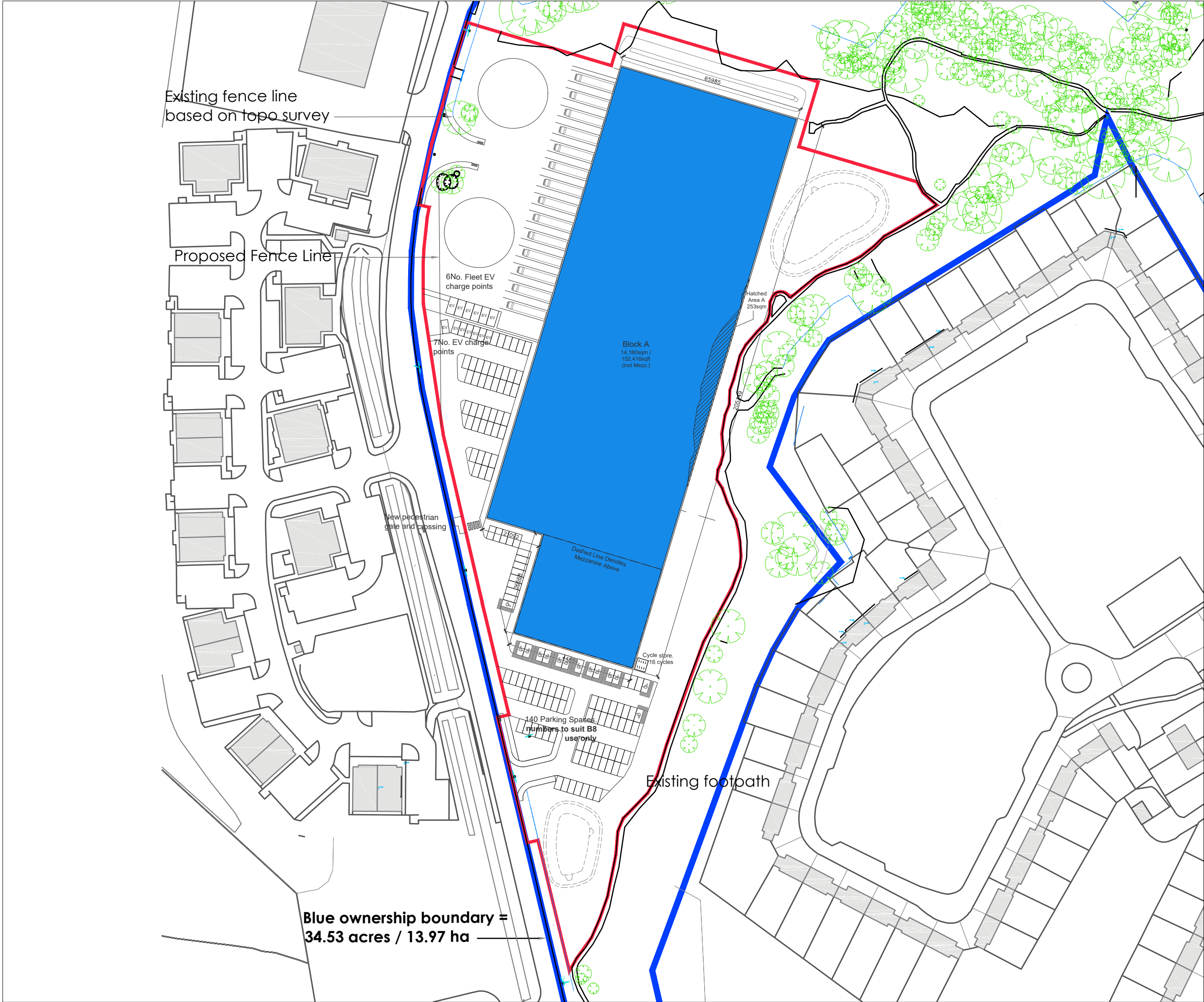
J2.6 - Dry ditch

Mammal path

Target Notes

Figure 3 - International Statutory Designated Sites within 10 km of the Site Centre

Drawing 1 - Proposed Development Plan



Rev	Description	By	Date
C	Initial Issue	MC	17.08.20
D	Parking repositioned, Building size reduced	MC	31.08.21
E	Existing walkway hatched	MC	04.10.21
F	Fleet EV added. Pedestrian crossing added	MC	18.10.21
G	Highways Updated	MC	02.12.21
H	OS Map Included	MC	06.12.21
P01	Draft Planning Issue	MC	05.01.22
P02	Planning Issue	MC	07.02.22

Internal Areas
Ground Floor: 135K sqft
First Floor: 17K sqft

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Client

FI REAL ESTATE MANAGEMENT

Project

Site 5
Wrexham

Description

Proposed Site plan

Status

PLANNING

Scale

1:1250 @A3 PJ

Drawn By

1200

Date

MAY21

Job Number

02-001

Drawing Number

P02

Revision

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Appendix A - References

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