

Method Statement in relation to Amphibians

October 2022

Land to the south of Lynwood
High Street
Johnstown
Wrexham
LL14 2SH

National Grid Reference: SJ30074612

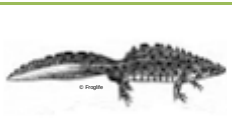


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1.0 Introduction & Objectives

- 1.1 As part of proposals to construct a new dwelling at a plot of land to the south of Lynwood in Johnstown, Wrexham (see Figure 1.1, Planning Ref.: P/2022/0178), Natural Resources Wales (NRW) provided comments in relation to nearby designated sites.

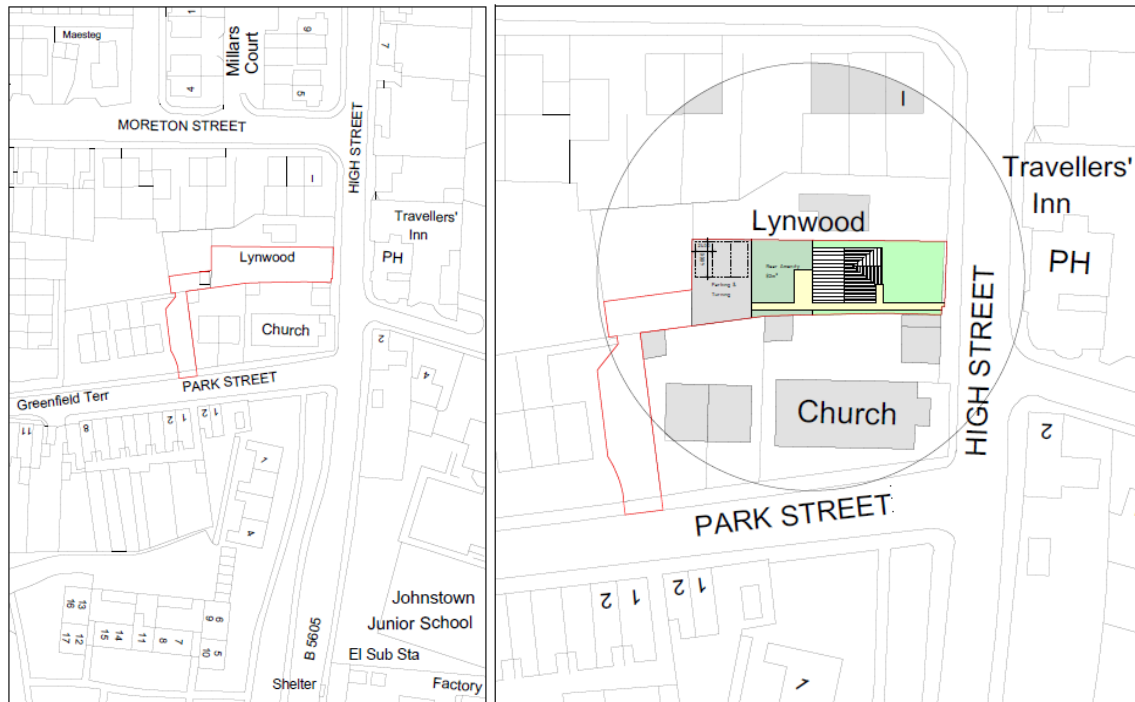


Figure 1.1: Existing (left) and proposed (right) location plan with red line boundary (©Blueprint Architectural Services)

- 1.2 In summary, the comments provided by NRW pertain to the Johnstown New Sites Special Area of Conservation (SAC)/ Stryt Las a'r Hafod Site of Special Scientific Interest (SSSI), and River Dee and Bala Lake SAC; the application site occurs approximately 73m from the former, and within the catchment area of the latter. Whilst a number of issues are raised by NRW, this document will seek to address those relating to ecology only, which are as follows:

1. Without prejudice to your assessment, we consider that the proposal is not likely to cause a direct impact on the conservation objectives of this SAC. However, based on our understanding of the location and nature of the scheme, together with the proximity of greenspace, we consider that proposals may in this case be required for the purposes of addressing indirect in-combination impacts on the SAC; particularly those associated with potential in-combination increases in recreational and other pressures within the SAC. We therefore advise that measures (e.g. provision of a commuted sum) are proposed to offset such possible impacts. We advise that the scheme design is informed by the provisions of Wrexham County Borough Council's GCN Local Planning Guidance.
2. We have concerns that the proposed development, as submitted, will damage the features for which the Stryt Las a'r Hafod SSSI is of special interest. The application site is located within 73m of the SSSI boundary. This site supports a nationally important population of Great Crested Newt and an assemblage of amphibian species. Paragraph 6.4.14 of Planning Policy Wales states development should be refused where there are adverse impacts on the features for which a site has been designated.

We advise that the application site could support these species. Results of surveys of roadside gully pots highlights the likely presence of these species in this part of Johnstown. We therefore advise that the following condition should be attached to any permission granted by your authority for the above application:

- Condition 1: No development or phase of development, including site clearance, shall commence until an amphibian Method Statement has been submitted to and approved in writing by the Local Planning Authority. The Method Statement should include the following:
 - the submission and implementation of amphibian Reasonable Avoidance Measures (RAMs) such as the erection of a one-way amphibian fence, prior to and throughout the duration of construction operations; and
 - the clearance of individuals from working areas.

3. We consider biosecurity to be a material consideration owing to the nature and location of the proposal. In this case, biosecurity issues concern invasive non-native species (INNS) and diseases. We therefore advise that any consent includes the imposition of a condition requiring the submission and implementation of a Biosecurity Risk Assessment to the satisfaction of the LPA. We consider that this assessment must include (i) appropriate measures to control any INNS on site; and (ii) measures or actions that aim to prevent INNS being introduced to the site for the duration of development and restoration.

- Condition 2: No development, including site clearance, shall commence until a Biosecurity Risk Assessment and Method Statement that considers invasive non-native species and specific diseases (e.g. Chytrid) has been submitted to and approved in writing by the Local Planning Authority. The risk assessment shall include measures to prevent the introduction of and where present control, removal or for the long-term management of invasive species both during construction and operation. The risk assessment shall consider landscaping and other related plans. The Biosecurity Risk Assessment shall be carried out in accordance with the approved details.

- 1.3 The above comments will therefore be addressed through a Method Statement detailing Reasonable Avoidance Measures (RAMs) for amphibians (Point 2), a Biosecurity Risk Assessment (Point 3), and a Proposed Compensation Scheme (Point 1) as per Local Planning Guidance in relation to the Johnstown Newt Sites SAC.

2.0 Method Statement

Objectives

- 2.1 Development related activities on the application site, such as piling, vegetation clearance, or excavation in areas of suitable newt habitat, for example, may potentially affect Amphibians that may inhabit the local area; notably including at the Johnstown Newt Sites SAC which occurs 73m to the west. As a result, safeguards must be applied to protect these species; the Method Statement below outlines sequential measures to be implemented to ensure these objectives are achieved.

Summary

- 2.2 To avoid harm to individual GCN, it is proposed temporary amphibian fencing is erected along the sites entrances to the south and east to deter GCN that may be present within the vicinity from entering the site from the designated site during the works; due to the impermeable nature of the brick walls forming the perimeter of some of the site, only the site entrances and some boundaries should need fencing though the decision should be made by the attending fencing contractor and ecologist following a site visit. Within the fenced area, vegetation will be cut back under the supervision of a licensed ecologist and carefully hand searched for GCN before complete clearance. Any rubble or brash piles will be similarly hand searched immediately prior to clearance. Should Great Crested Newts be found during the search, works must cease immediately and a European Protected Species Mitigation Licence (EPSML) will likely to be required from NRW prior to continuation of the works.

Pre-works understanding

- 2.3 Before any works commence at the application site all site contractors/stakeholders will be briefed with a 'Tool-box' talk of the potential for protected species to occur on site by an assigned Ecological Clerk of Works (ECoW), including amphibians and reptiles, what to look out for and what to do if animals are found. This talk should cover ID aids and legal ramifications of an offence through reckless behaviour.
- 2.4 Contractors/stakeholders will ask any questions as required following the toolbox talk, before signing the Audit Form (see overleaf) which will be kept by the Ecologist/ECoW for audit trail.
- 2.5 Following the toolbox talk an "Environmental Champion" will be appointed, likely to be the Site Manager, who will be responsible henceforth to report to the ECoW throughout the work schedule at agreed intervals in the absence of ecological supervision.
- 2.6 Photograph(s) of relevant protected species will be displayed at the site office memo board and/or kept by the contractor's personal being for visual reference purposes.
- 2.7 Construction works are to only take place during daylight hours 8.00am-6.00pm as opposed to the night time, when amphibians are most active.

Pre-works

- 2.8 Timings:
- Juvenile and adult amphibians are most vulnerable to harm during their **hibernation period considered to be November to February** inclusive. Where possible site clearance works should avoid this sensitive period. If this is not possible works carried

out during this sensitive period (between November – February) should take into account the potential presence of hibernating animals within rubble piles, assorted items lay about site, areas of dense vegetation, for example.

- Pre-works erection of temporary one-way amphibian fencing along the southern and eastern site entrances and some site boundaries to direct newts away from the site during the works; the installation will be supervised by the licensed ecologist and the Environmental Champion will monitor and repair the fence on a daily basis (see Figure 2.1). Newt grids will be installed at the site access points (see Figure 2.2).
- Pre-commencement check - a walkover and hand search is to take place by an Ecologist/ECOW before any rubble, pile, bulky item or vegetation clearance.

2.9 Habitat manipulation prior to works (March-Oct)

- 3 to 5 days prior to stripping the site bare of vegetation in prep for development, it is recommended that habitats are first trimmed in phases; initially trimmed to 150mm in height using mowers, brush cutters or similar approved cutting method. Strimming should commence directionally south to north across the site at all cutting phases allowing animals to move off site, or towards desired or retained areas.

N.B. To avoid impacts to nesting birds, some vegetation may require clearance prior to March (for example dense scrub or ivy). Thus, clearance should be undertaken under supervision of the ecologist, and only when GCN are likely to be active, i.e. when night time temperatures remain above 3°C and there have been no ground frosts or snowfall in the preceding week.

- Once vegetation is cut to 150mm a further hand search should take place within 72 hours. Following the hand search, when herpetofauna are confirmed absent, the vegetation should then be cut to ground level (or below 100mm), raked bare and maintained at this sward thereafter during the construction period. Habitat manipulation like this will discourage animals from using the areas thus less likely to be harmed by works on site.
- Brash piles to be accumulated on hardstanding and all brash piles to be removed within 48 hours of dumping to avoid being utilised by species seeking shelter.

During works

- 2.10 Any clearance works to areas of interest/ refugia as considered applicable by the Ecologist (such as log piles, brick piles) or loss of existing dense vegetative features, should only commence after a careful visual inspection (Hand Search) has been carried out and the Ecologist has determined that no animals are present and is satisfied no animals are at risk. Any animals found that are not European Protected Species (EPS) will be removed from harm's way and placed into the hibernaculum, species pending and following correct protocols/biosecurity measures.
- 2.11 In order to ensure the temporary amphibian fence is maintained in an appropriate condition, the Environmental Champion will undertake daily checks at the end of the working day, and any overhanging vegetation will be removed to ensure the barrier cannot be breached. If minor tears are noted in the membrane, these will be repaired using duct tape. If there are major breaches in the fencing, the ecologist will be contacted, and a repair programme devised to ensure there is no risk of GCN accessing the construction site.

- 2.12 For the full duration no works are to extend off site in the areas adjacent to the red line boundary or within agreed buffer zones/fencing. No pallets, skips or otherwise are to be placed upon areas of dense vegetation and should instead only be placed on flat, cleared ground.
- 2.13 The impact of works on adjacent habitats will be avoided by the clear demarcation of the works area. All work must strictly be in accordance with all relevant Pollution Prevention Guidelines published by the Environment Agency which may include, but is not limited to, PPG1 (general), PPG5 (works in, near, or liable to affect watercourses) and PPG6 (work at construction & demolition sites).
- 2.14 Contingency/emergency plans should be drawn up to address chemical spillage, drainage, collision, etc.
- 2.15 Machinery and materials to remain on bare ground and reasonable efforts must be made to avoid creating piles, or accumulated aggregates. Materials that require piling will be stored within areas of bare ground above ground level, using pallets to prevent reptiles and amphibians from seeking shelter below.
- 2.16 Any excavated materials stored overnight will be searched prior to being used as infill.
- 2.17 Where excavations/trenches are excavated it should be ensured that they are not left open overnight to avoid amphibians falling into them and becoming trapped. If trenches cannot be filled in after the working day for whatever reason, an escape mechanism such as wooden planks of 10 cm wide should be placed in them at a 45-degree diagonal angle, to serve as an escape mechanism to small animals including mammals and herpetofauna.
- 2.18 Excavations should be checked in the morning on a daily basis for the presence of any animals that may have fallen in during the night. Excavations should be backfilled as soon as possible.
- 2.19 All site operatives will maintain a watching brief throughout the work schedule and report any issues, anomalies or discrepancies to the ecologist or wildlife champion as appointed.
- 2.20 If any newts are found work must stop immediately and contact should be made with the assigned licensed, qualified ecologist / ECoW.
- 2.21 At no point should any person handle a reptile without the express permission of the Ecologist.
- 2.22 Any frogs or toads found should be carefully caught using wet gloves, placed (where capture is possible and humane) in a ventilated box using dampened gloved hands and released into suitable nearby like for like habitat that will be unaffected by the proposed works. Toads should not be touched using non-gloved hands as they secrete a toxin through their skin, and they should not be handled for longer than is necessary.
- 2.23 Plastic netting, wire coils or similar hazardous features should not be left on the ground, to avoid entanglement. Aggregates/constructional materials should be stored on pallets as opposed to the storing on the ground.
- 2.24 If in the event a GCN is found work must cease; the Ecologist will be made aware of the finding and will appraise the situation providing further advice. Site staff must be made aware that if GCN are found there is a correct procedure in place to follow, and failure to halt works may result in committing an offence. At no point should any person handle a GCN or suspected

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GCN. Unlicensed handling is illegal and untrained handling may cause the newt unnecessary stress and injury.

A guide to timings

2.25 Table 2.1 below outlines the correct timings in which to undertake the prescribed RAMs.

Table 2.1: Timings for RAMs to be undertaken at the land to the south of Lynwood

Operation	Months												Notes
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
Early understanding													
Toolbox Talk	Any time prior to works												Soon as possible for early understanding
Appoint Wildlife Champion	Following toolbox talk												-
Pre-works													
Buffer zone demarcation & signage	Pre-habitat manipulation & hand search												To avoid encroaching in sensitive area
Erection of newt exclusion fencing	Pre-habitat manipulation & hand search												To prevent GCN from accessing the site
Hand-search on site by Ecologist			Y	Y	Y	Y	Y	Y	Y	Y			Prior to habitat manipulation
Habitat Manipulation			Y	Y	Y	Y	Y	Y	Y				Staggered, as described, to allow animals to move away
Establishment of buffer zones during management	During habitat manipulation												Specifics To be sanctioned by LPA

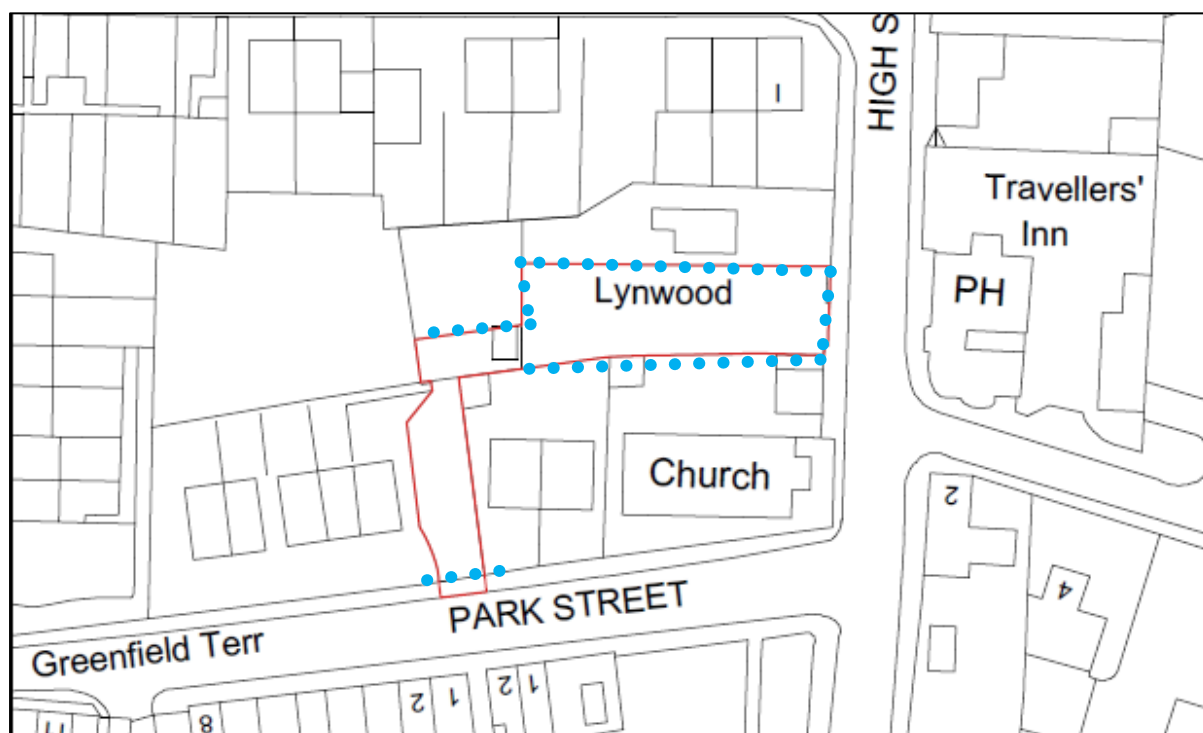


Figure 2.1: The application site with the proposed one-way, temporary amphibian exclusion fencing marked in blue.

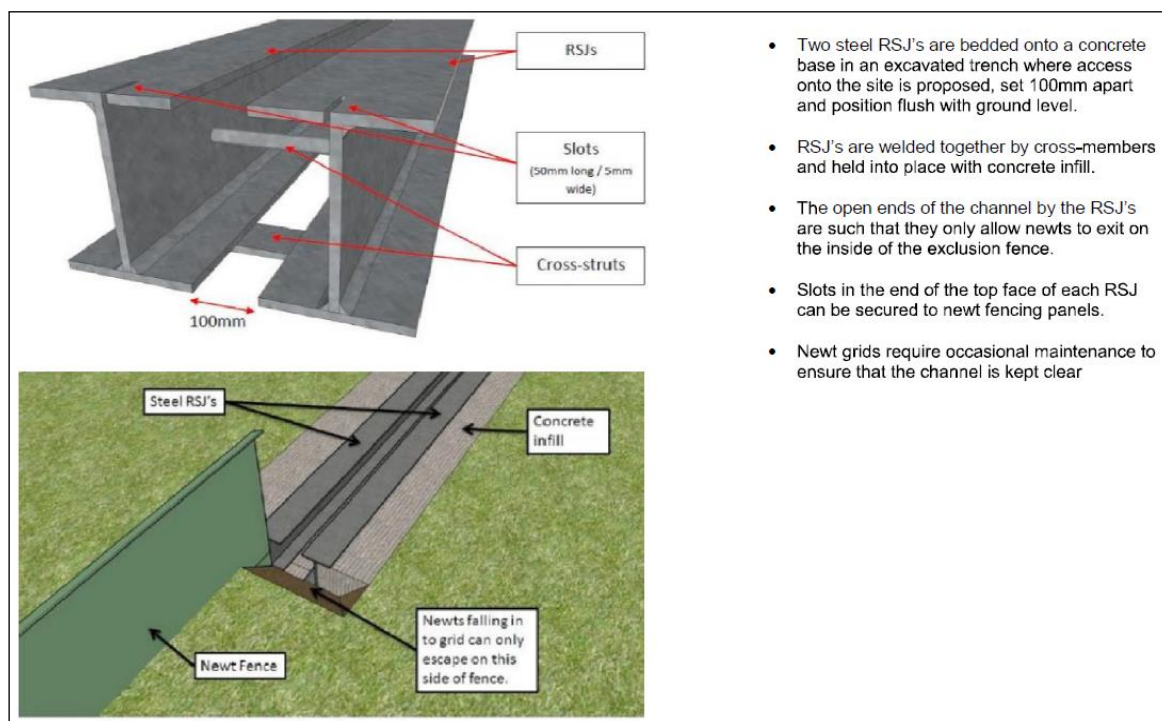


Figure 2.2: Newt grid site access illustration.

Identification Aids:

Great Crested Newt (*Triturus cristatus*)



Identification Tips

- Largest Newt in the UK, up to 16cm in length, but juveniles are smaller,
- Big & black animal with rough, warty skin,
- Orange/yellow colouring on belly,
- Irregular black blotches on belly,
- Toes banded black/orange (yellow toe nails),
- Male has a jagged crest on its back which sags when not in the water, and a separate smoother crest along tail, white stripe on tail too,

DO If a GCN is discovered during works, STOP ALL WORKS in the area, inform your site manager and contact the project ecologist IMMEDIATELY .	DON'T Do not touch or handle a GCN they are very delicate – and it is against the law. Penalties for breaking the law include unlimited fines, imprisonment and seizure of equipment. DO NOT RISK BREAKING THE LAW
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For any questions call Tyrer Ecological Consultants Ltd

Tel: 01704 875 781

Toolbox Talk Audit Form

Tyrer Ecological Consultants Ltd



Site:		Ecologist(s):	
I can confirm I have attended the formal Toolbox talk held by the named Ecological Consultant. I confirm I am aware of the legislation in relation to herpetofauna species that may be in the locale. I confirm I will endeavour, to the best of my capability, to follow the measures outlined in the RAMS to protect all animals from harm, and know what to do if I encounter protected species.			
Name:		Signed:	
Company:		Date	
Name:		Signed:	
Company:		Date	
Name:		Signed:	
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3.0 Biosecurity Risk Assessment

- 3.1 Due to the application site's location in a sensitive area, NRW has advised that a Biosecurity Risk Assessment be created in relation to invasive non-native species (INNS) and diseases. It is considered that the measures detailed in this assessment, if followed fully, will ensure all relevant legislation and guidelines are adhered to and will ensure risk of transfer of biohazards are minimised.
- 3.2 Biodiversity Risk Assessments are intended to ensure developers and contractors are aware of the harmful organisms that are at risk of being spread as a result of their works. These can include plant species such as Japanese knotweed (*Reynoutria japonica*), invasive animals such as signal crayfish (*Pacifastacus leniusculus*) and plant and animal diseases such as ash dieback (*Hymenoscyphus fraxineus*) and Chytridiomycosis caused by the Chytrid fungus (*Batrachochytrium dendrobatidis*). These organisms could be on-site or could be introduced to the site when importing material; there is also the risk of aerial spread of the species via spores, spread through water (such as seed transport downstream) or via animal vectors (e.g. if birds eat berries or in mud tracked off-site by construction vehicles). In order to avoid unintentional spread, control measures are needed to be implemented for the duration of the works. As the mechanisms of transfer vary, the biosecurity risk assessment needs to be site specific and tailored to the development, with control measures employed accordingly.

Relevant legislation

- 3.3 The key legislation pertaining to transfer of harmful organisms is The Wildlife and Countryside Act (1981), Section 14 which states that:

*Subject to the provisions of this Part, if any person releases or allows to escape into the wild any animal which—
Is of a kind which is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state; or
is included in Part I of Schedule 9,
he shall be guilty of an offence.*

Subject to the provisions of this Part, if any person plants or otherwise causes to grow in the wild any plant which is included in Part II of Schedule 9, he shall be guilty of an offence.

- 3.4 Schedule 9 is a list of plants and animals to which this section applies, and includes plant species such as Japanese knotweed, Himalayan balsam (*Impatiens glandulifera*), some cotoneaster species (e.g. *Cotoneaster horizontalis*) and Rhododendron (*Rhododendron ponticum*), plus animal species such as Chinese mitten crab (*Eriocheir sinensis*) and slipper limpet (*Crepidula fornicata*) along with others.
- 3.5 In addition, there are guidelines provided by organisations on avoiding the spread of novel pathogens in the environment, such as SARS-CoV-19 (which causes Covid-19 in humans). This is particularly relevant to bats so the International Union for Conservation of Nature (IUCN) Bat Specialist Group have provided the following advice, which has been taken into account within this risk assessment:

“On 13 April 2020 the IUCN Species Survival Commission Bat Specialist Group recommended the suspension of all field work that involves interactions with bats while it considered the risk of human-bat transmission of SARS-CoV-2. Subsequently, the Bat Specialist Group convened a global panel of experts with expertise ranging from bat ecologists to virologists who have assessed the scientific evidence for human-to-bat transmission and efficacy of risk mitigation

strategies. It is the opinion of the panel that there is a credible risk of human-to-bat transmission of SARSCoV-2, but this risk can be reduced using appropriate mitigation strategies.”

Existing site conditions

- 3.6 The site from aerial assessment, using Google Earth Pro (2021) and street view, appears to comprise an area of disused yard encroached by scrub and ruderal vegetation accessed from High Street to the east, and a smaller yard with access from Park Street to the south which appears to be in use and thus absent of any taller vegetation; together the two yards form an L-shaped site. A small, brick-built shed is present at the junction of the L.

Proposed works and biosecurity implications

- 3.7 Clearance of the site in its entirety, including demolition of the existing building is proposed followed by construction of one new dwelling with associated landscaping. Other ground works may also commence around this time, including soil testing for contamination for example. Although demolition poses a low risk of harmful organism transfer, there are risks associated with vegetation transfer during investigative groundworks. Vegetation and ground clearance also pose risks. Once construction commences there is a lower risk of biosecurity infringements, however measures will need to be taken to ensure organisms in the soil are not tracked off-site, or new organisms track on-site. The Biohazard Risk Assessment and Mitigation Table below (Table 3.1) identifies each risk and details measures to be taken to limit the transfer of potentially hazardous organisms, including pathogens.

Conclusions

- 3.8 It is considered the measures outlined above and within the table below, if fully followed, will ensure all relevant legislation and guidelines are adhered to and will ensure risk of transfer of biohazards are minimised.

Table 3.1: Biohazard Risk Assessment and Mitigation Table

No	Phase of Development	Biohazard	Transfer pathway	Working Methods to mitigate risk	Completed by (print name, date and sign)
1	Ground investigation	Risk of spread of INNS or injurious weeds on- or off-site.	Seeds or plant fragments tracked within mud accumulated on vehicle wheels and under wheel arches. Seeds or plant fragments within mud on contractors' boots.	Wheel wash vehicles prior to entering or leaving site on an area of hardstanding ensuring the water does not run off-site. Ensure contractors' boots are clean prior to entering or leaving site. Brush off mud or wash as appropriate within a dedicated cleaning area to avoid material being washed off site.	
2	Vegetation clearance	Risk of fragments of vegetation being deposited off-site	Initial strimming to enable hand searching for great crested newts	The site will be checked for INNS prior to strimming commencing. Plants, or areas containing plants, will be marked for hand clearance with tape and the contractors advised to avoid the area until the plants are removed. If seeds/berries are present, a bag will be tied around them to avoid the seeds/berries dropping onto the ground during removal. The plants will be removed by a licenced invasive species contractor, and disposed of at a landfill authorised to accept invasive species waste.	
3	Site clearance	Risk of transfer of pathogens to amphibians	During relocation of amphibians from the site to the receptor area	The licenced ecologist that will handle any amphibians will have clean boots that are treated daily with a bleach solution. Fresh disposable non-latex gloves will be used and kept damp during handling of amphibians. Any equipment used to transfer the amphibians such as buckets or containers will have been washed in bleach solution 12 hours prior to use and thoroughly rinsed and dried to ensure the bleach solution is no longer present.	

No	Phase of Development	Biohazard	Transfer pathway	Working Methods to mitigate risk	Completed by (print name, date and sign)
4	Ground clearance	Risk of spread of INNS or injurious weeds on- or off-site.	Seeds or plant fragments tracked within mud accumulated on vehicle wheels and under wheel arches. Seeds or plant fragments within mud on contractors' boots. Soil material moved off-site	Wheel wash vehicles prior to entering or leaving site on an area of hardstanding ensuring the water does not run off-site. Ensure contractors' boots are clean prior to entering or leaving site. Brush off mud or wash as appropriate. Any soil accumulated during ground clearances and levelling will be reused on site. This soil will be kept weed free through glyphosate spraying as necessary until landscaping has been completed. If any spoil is taken off site, it will be treated as controlled waste and disposed of at a landfill authorised to accept invasive species waste, purely as a precautionary measure.	
5	Construction	No biohazards have been identified during construction, however if any are identified, this Risk Assessment will be updated accordingly.	N/A	N/A	
6	Landscaping	Risk of transfer of plant pathogens on- or off-site	Importing/exporting plant pathogens	Checks to be made of plant stock to ensure no <i>Phytophthora</i> is present prior to leaving the nursery, or plant stock sourced from a supplier which can verify plant health. In order to avoid the risk of ash dieback <i>Chalara</i> being imported, ash trees should not be specified in the landscaping scheme. Timber produced by felling of any ash tree within the site should be brushed clean of leaf and shoot material prior to removal from site to prevent the spread <i>Chalara</i> off-site by human vectors. Species listed on Schedule 9 of the W&C Act should not be included within the planting proposals for the site.	
Any other points to note/comments from auditor: Due to the risk of Covid, safety precaution measures will be followed by all contractors in line with National and Regional Guidelines to avoid spread of the virus to humans, and potentially bats.					

4.0 Proposed Compensation Scheme

- 4.1 Wrexham Borough Council released a local planning guidance note adopted in June 2018 and entitled "GREAT CRESTED NEWT MITIGATION REQUIREMENTS – Johnstown Newt Site SAC and the Wider Countryside", referred to in part as "GCN mitigation requirements". The note provides a framework for assessing the potential impacts of developments upon GCN and subsequent mitigation requirements depending on their scale, proximity to GCN breeding/resting sites, or proximity to the Johnstown Newt Site SAC.
- 4.2 Table 2 of the GCN mitigation requirements has been used to determine the mitigation requirements at the Land to the south of Lynwood (see Figure 4.1), with the proposals considered a 'minor development' of 'up to 10 dwellings', which is 'adjacent to' the SAC. Under this guidance, it is clear that habitat loss at the site must be mitigated for on a like-for-like basis, whilst an Appropriate Assessment (to be undertaken by the Local Planning Authority as a part of their Habitats Regulations Assessment) will also be required and should take into account potential impacts to the SAC.

Table 2 - Development affecting designated sites with GCN as the main feature (Johnstown Newt Site)			
Development type	Major Development	Minor Development	
	Outline/ Approved Matters/etc Mineral & Waste, Transport applications etc	Up to 10 dwellings	Extension/ Conservatory/Garage
A2 Directly affects SAC or functioning of SAC with GCN as key feature	Like for like principle; Need to provide replacement habitat capable of its purpose e.g. breeding pond prior to destruction of existing, so that the "favourable conservation status" of the population is maintained. Also need to demonstrate through a "ToLS or AA that the development will not significantly affect the Conservation Features of the SAC.		
B2 Adjacent to, and within key ecological corridors associated with Johnstown Newt Site SAC	Mitigate for loss of habitat type on a like for like basis – <i>Refer to management costs within appendix 1.</i> Also need to demonstrate through a ToLS or AA that the development will not significantly affect the Conservation Features of the SAC directly or indirectly.		Only need to undertake a ToLS dependant on suitability of site to be lost Undertake Reasonable avoidance measures (RAMs) to prevent harm to GCN (see appendix 4). This depends on suitability of site if poor e.g. hardstanding / amenity grassland then a note to applicant might suffice.

Figure 4.1: Extract from the GCN mitigation requirements showing mitigation determined to be appropriate.

- 4.3 The GCN mitigation requirements further provide a guide for quantifying and designing mitigation, with the options for habitat mitigation in order of preference including: onsite provision > a combination of onsite and offsite provision > offsite provision but this must be close to the site > a financial contribution towards strategic GCN mitigation/compensation in lieu of direct provision. However, the guidance also states that developments of up to 10

dwellingings will generally not be required to provide mitigation land due to size constraints, and instead the financial contribution option can be acceptable. In the case of the Land to the south of Lynwood, the small scale of the application site (<0.1ha) leaves little space of onsite mitigation, and therefore a financial contribution/commuted sum is instead proposed as per the NRW comments.

- 4.4 Appendix 1 of the GCN mitigation requirements provides approximate costs of creating mitigation sites; by using this framework an appropriate sum can be determined and agreed.
- 4.5 The following activities have been included in calculating an appropriate sum, based on creation of a new meadow grassland of equal size to the application site and creation of a single hibernaculum:
- Land acquisition (0.05ha, £187.50)
 - New Fencing (20m, £140)
 - Grassland / meadow planting (0.05ha, £50)
 - Hibernaculum creation (x1, £100)
 - Grassland – mowing once per annum (0.05ha for 25 years, £20)
 - Fence Maintenance (20m for 25 years, £650)
- 4.6 Taking into account the extremely small scale of the application site a per-site monitoring and surveillance/gardening cost is considered disproportionate to the impact of the proposed development. Instead, an alternative of Hibernaculum creation has been included. The proposed financial contribution has therefore been calculated at **£1147.50**; it is suggested that this sum be utilised in a communal pot to create a larger area of GCN habitat.

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