

Greenscape Environmental Ltd

Long Acres, Lyth Bank, Shrewsbury, Shropshire, SY3 0BW

greenscapeenvironmental.co.uk

2298 2003L

05 March 2020

Gratton Oaks
c/o Sean Caddick Architectural
13 Belvidere Walk
Shrewsbury
SY2 5LT

To Whom it May Concern,

This letter is prepared in response to comments received as part of the public consultation for a proposed housing development at Wynnstay Park, Ruabon, Planning Ref: P/2019/0805.

This document is considered an addendum to the ecological report submitted by Greenscape Environmental Ltd; report reference: 2298 1911R. Where areas of this report are superseded by this letter, this will be clearly noted.

A site visit and appraisal of information was conducted on the 3rd March 2020 by P Marshall and B Jones of Greenscape Environmental. Conditions on this survey were favourable, being dry with a light breeze.

The site within the boundary of the bunds was seen to consist of approximately 30-40% hardstanding / bare ground, with the rest being tussocky grassland, ruderal growth and small stands of self-set trees and scrub which are approximately 14 years old based on publicly available historic aerial photographs. The bare ground appears to be disturbed with use by dog walkers and a significant amount of bike activity.

The comments suggested that a plant species list was not included in the report. Plants seen on site were listed throughout section 4. The list has been updated after a second visit to site conducted in March 2020 and is included below in no particular order.

Common Name	Latin Name
Cow Parsley	<i>Anthriscus sylvestris</i>
Clover	<i>Trifolium sp.</i>
Dandelion	<i>Taraxacum officinale</i>
Common Sorrel	<i>Rumex acetosa</i>
Ribwort Plantain	<i>Plantago lanceolata</i>
Greater Plantain	<i>Plantago major</i>
Thistle	<i>Cirsium sp</i>
Ragwort	<i>Senecio jacobaea</i>
Black Medick	<i>Medicago lupulina</i>
Rose	<i>Rosa sp.</i>
Broom	<i>Genistae</i>
Rosebay Willowherb	<i>Chamaenerion angustifolium</i>
Yarrow	<i>Achillea millefolium</i>
Mouse-ear	<i>Cerastium fontanum</i>
Cinquefoil	<i>Potentilla fruticosa</i>

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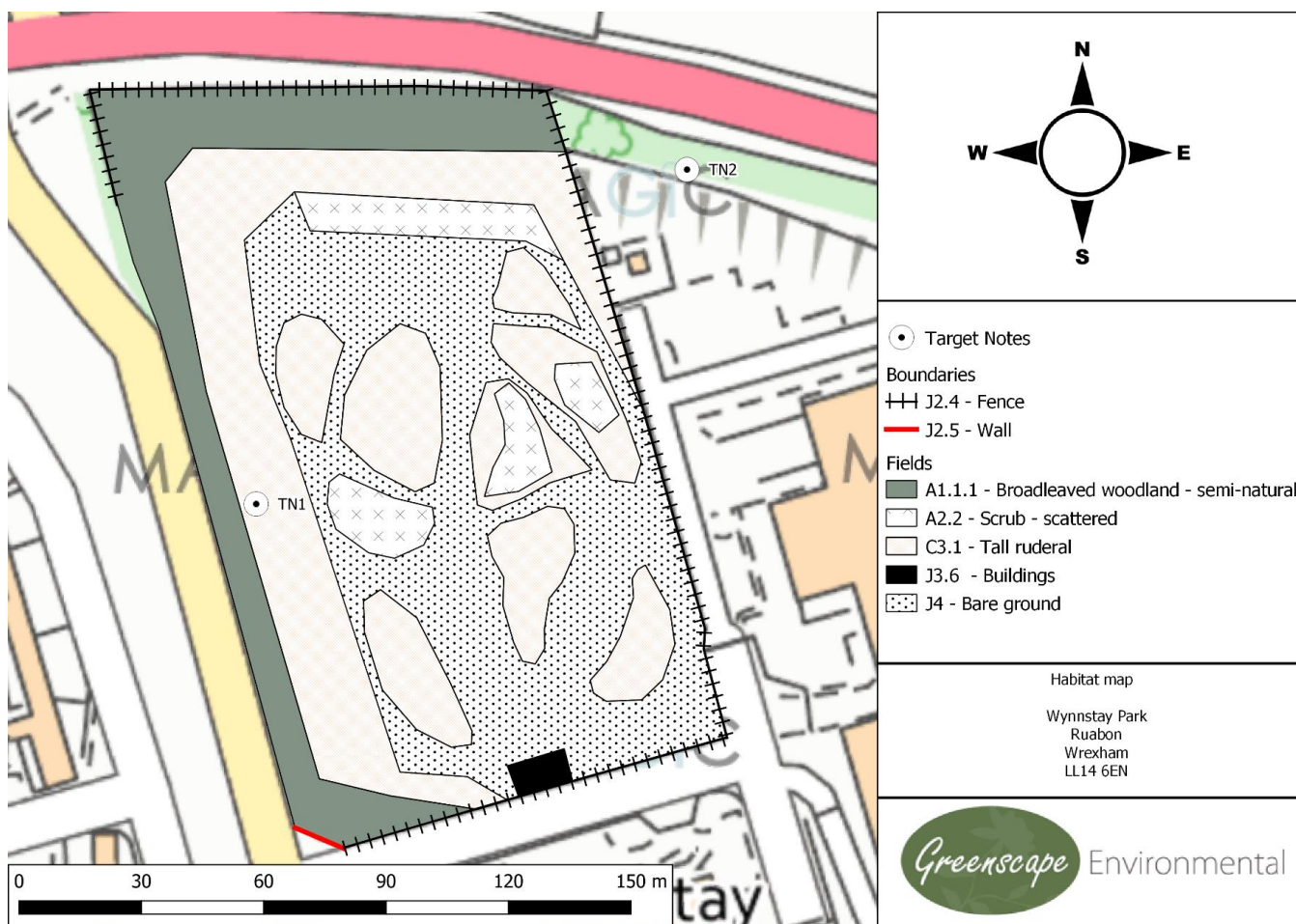
The trees and woody plants seen throughout site and on its boundaries include the following, again in no particular order.

Common Name	Latin Name
Hawthorn	<i>Crataegus monogyna</i>
Blackthorn	<i>Prunus spinosa</i>
Ash	<i>Fraxinus excelsior</i>
Oak	<i>Quercus sp.</i>
Sycamore	<i>Acer pseudoplatanus</i>
Goat Willow	<i>Salix caprea</i>
Hazel	<i>Corylus avellana</i>

We have compared this list to a species list we subsequently found for the site and are satisfied this is representative of the area considering the significant amount of disturbance there is on site.

Phase 1 Map

One comment about the original report by Greenscape was that there was no phase 1 map. We accept this was an oversight and include one now.



Target Notes
TN1 – Mammal track on western boundary
TN2 – Fox hole identified off site

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The habitat being lost includes approximately 0.7 ha of bare ground, 0.7 ha of sparsely vegetated land, and 0.13 ha of mixed scrub. This is being replaced by approximately 0.56 ha of housing (including footpaths and roads), 0.8 ha of gardens and open green space, in addition to new tree planting down the eastern boundary and in the southern area of the site.

Dingy Skipper

The Dingy Skipper butterfly is a priority species according to the lists in Section 7 of the Environment (Wales) Act 2016. This was not expressly stated in the report, which was an oversight. The Act was included in section 2.3 of the report, where the legislation and policies of note are listed.

There are records of the Dingy Skipper on and around this site, which was alluded to, but these records are over 13 years old, recorded between 2005 and 2007. Aerial imagery of the site has been compared from the time of these records to present day, and a significant change in the site makeup is noted. In 2006 the site was much less disturbed and looked to support a wider area of grassland and a good mosaic of habitats which would comprise a priority habitat. In 2019/2020 the site is heavily disturbed and soiled by litter and vandalism. Tracks indicative of recent and historic use by dirt-bikes are found all around the site. The quality of the site has reduced significantly and unless some remedial action is undertaken is likely to continue doing so.

It is considered that the area of land with potential to support the dingy skipper has become unfavourable and further surveys prior to planning are not commensurate with the potential losses of habitat of value.

The report submitted as part of the planning application included mitigation measures to provide suitable areas supporting butterflies in perpetuity post-development. Certain aspects of these recommendations were erroneous. The following plants are to be used in place of those in section 6.2.

Core Grass Species	
Common Name	Latin Name
Common Bent	<i>Agrostis capillaris</i>
Red Fescue	<i>Festuca rubra</i>
Cock's Foot	<i>Dactylis glomerata</i>
Yorkshire Fog	<i>Holcus lanatus</i>

Core Forb Species	
Common Name	Latin Name
Bird's-foot Trefoil	<i>Lotus corniculatus</i>
Yellow rattle	<i>Rhinanthus minor</i>
Buttercup sp.	<i>Ranunculus sp.</i>
Fleabane	<i>Pulicaria dysenterica</i>
Kidney Vetch	<i>Anthyllus vulneraria</i>
Wild Marjoram	<i>Origanum vulgare</i>
Mouse-ear hawkweed	<i>Hieracium pilosella</i>
Black knapweed	<i>Centaurea nigra</i>

Of the species listed above, bird's-foot trefoil is the most important for Dingy Skippers, and so will make up approximately 75% of the species mix. The species list includes larval food plants as well as nectar species, which will support butterflies in all stage of life. It is anticipated that not only the dingy skipper will be assisted.

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The man-made bund separating the site from the main road to the north has a substantial south-facing slope which will be an ideal location for these planting enhancements.

It should be noted that re-seeding should not cover the whole mitigation area, as some areas of bare ground are important for habitat diversity and different life stages of the butterfly. It is recommended that seeds are scattered along the top of the bund to the north, thrown only a few meters down the bank. This will then cause natural colonisation by seed-drop as the plants develop. The lower parts of the bund will be scraped bare to maintain a mosaic habitat. This will result in approximately 50% seeded, 50% bare soil during habitat creation.

It is recommended that this enhancement is overseen by a competent ecologist and the areas highlighted managed in perpetuity.

Hedgerows

There is opportunity to plant a substantial hedgerow down the eastern site boundary. If this were to include fruiting species such as apple, plum, pear and cherry, this will also enhance the food supply for local butterflies in their adult stage as well as compensate for the loss of shrub species within the development site itself.

Badgers

The originally submitted report included mention of mammal tracks seen on the western boundary. There is now anecdotal evidence of badgers being active in the area, as obtained from public consultation comments. The nearest official record obtained through the data search from Cofnod was submitted with 10m accuracy (8-figure grid reference) and was a sett 1km away. It must be noted that potential offences relate to sett disturbance and damage, which may include harming individual badgers.

During the site revisit in March 2020, a hole was noted off-site to the northeast. Reaching into the hole and collecting substrate revealed no badger hairs, and a strong musty odour was indicative of fox. Management of the bunds is likely to maintain the foraging habitat of any badgers in the area. The top and the northern face of the bund leading down to the road will remain under current management. An offence is considered highly unlikely.



Figure 1. Fox hole

No other evidence of badger was found on or around the site.

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Reptiles

During both site visits, potential artificial cover objects were overturned to check for reptiles beneath. No reptiles were found on either site visit.

It is acknowledged that there is good terrestrial value along the railway line which runs northeast-southwest approximately 170m away to the south. This is separated from site by busy industrial units and suboptimal terrestrial habitat. Connectivity is provided by the bund that runs along the northern boundary of the industrial units and the green strip to the east. This is being retained throughout development. It is notable that the nearest records of grass snake and slow worm are 1km and 1.3km away respectively.

The reasonable avoidance measures method statement outlined in the original report for great crested newts will also protect any reptiles that are in the area.

Bat and Bird Boxes

None of the trees around site below the bunds had any potential roost features that might be used by bats. The site does not currently have any roosting value to bats, and therefore the two integral boxes recommended by the report are most definitely considered an enhancement, as more roosting habitat will be available than is currently present.

A reasonable and respectable limit to bat boxes would be to install them in 10% of the newly proposed properties, which would total 4 boxes.

The trees around the site including the bunds were checked for evidence of old nests, and at least five were seen in the boundary trees, with two on the small trees on site. Whilst the original report did not specify a number of bird boxes to be included, five bird boxes will therefore be recommended.

Birds heard or seen on site during the March 2020 revisit included blackbird, greenfinch, goldfinch, blue tit and hedge sparrow. As such, three Schwegler 1b bird boxes and one sparrow terrace will be erected to support these species. One integral swift box will be included on site to provide enhancement for the nationally declining species.

As many of the trees around the site boundaries (the northern bund and the western side) will be retained as per the site block plan (drawing no: 18/1786/03), this should increase the overall nesting capacity of the site.