

Title	Proposed Raw Material Intake/ Cleaning and Weighing House at Lloyd's Animal Feeds, Bridge Road (North), Wrexham Industrial Estate, Wrexham – Great Crested Newt and Reptile Reasonable Avoidance Measures Method Statement
Client	Lloyd's Animal Feeds (Western) Ltd
Date of Method Statement	2nd March 2021
Author	Tom Knight

1 Introduction

Method Statement

- 1.1 Marches Ecology was commissioned by Lloyd's Animal Feeds (Western) Ltd to produce a Reasonable Avoidance Measures (RAMs) Method Statement to avoid any impacts on Great Crested Newts (*Triturus cristatus*) due to a proposed development at an existing industrial facility on Bridge Road (North), Wrexham Industrial Estate, Wrexham (Approximate OS Grid Ref. SJ 383 496). The proposal has received planning consent subject to a number of conditions (Planning Ref. P/2020/0599). This RAMs Method Statement has been produced, in part, to satisfy the requirements of Conditions 4 and 5 of the consent. Condition 4 states the following:

'No part of the development shall commence until a scheme of Reasonable Avoidance Measures for great crested newts has been submitted to and approved in writing by the local planning authority. The scheme shall include, but not be limited to, the following information:

- 1. Provision of a habitat corridor to be retained across the site,*
- 2. Implementation of appropriate biosecurity measures,*
- 3. Evidence of the implementation of the approved avoidance/ mitigation measures.*

The development shall only be carried out in accordance with the scheme as may be approved'.

Condition 5 states the following:

'The development shall be carried out in strict accordance with the findings and recommendations contained within the ecology assessments referenced:

'Knight, T. (2018). Proposed Development at Lloyds Animal Feeds, Bridge Road (North), Wrexham Industrial Estate, Wrexham – Preliminary Ecological Appraisal Marches Ecology',

'Knight, T (2020), Letter Headed Proposed Raw Material Intake/ Cleaning and Weighing House, Lloyds Animal Feeds, Bridge Road (North), Wrexham Industrial Estate, Wrexham – Ecology Addendum. Marches Ecology, and

Knight, T. (1 February 2021) Proposed Raw Materials Intake / Cleaning Weighing House, Lloyds Animal Feeds, Bridge Road (North), Wrexham Industrial Estate, Wrexham - Ecological Additional Information, approved as part of this application'.

- 1.2 Non-licensed RAMs are often implemented at sites where the risk to individual Great Crested Newts/ their habitat has been assessed as low or negligible. This document briefly

assesses the habitat both within the proposed development site and immediately surrounding area for its potential value to Great Crested Newts. The proposed non-licensed RAMs are to be implemented prior to and during the period of works. The RAMs will ensure as far as is reasonably possible that impacts on Great Crested Newts are minimised/avoided.

- 1.3 It should be noted that following the RAMs outlined in this Method Statement does not waive or derogate any of the offences under the *Habitat Regulations*¹ should an offence be committed. The aim of this Method Statement is to reduce the risk of an offence occurring to an 'acceptable' level by the implementation of reasonable steps.

Reptiles

- 1.4 Marches Ecology (2018)² states that most of the proposed development site is unlikely to be of potential value for reptiles (Grass Snake, Adder, Slow-worm, Viviparous Lizard). However, there are vegetated areas which provide habitat of moderate potential value for reptiles. No recent records of any species of reptile were obtained from the surrounding part of Wrexham Industrial Estate in 2018.
- 1.5 The 2020 Addendum report³ recommends '*that the RAMs Method Statement for Great Crested Newts will also incorporate appropriate actions/ procedures in the eventuality that any reptiles are found prior to or during the construction phase*'. These actions/ procedures are included in the measures detailed in Section 6. As this is a precautionary approach and the risk to reptiles is considered to be negligible/ low, no further specific reference to reptiles will be made in this Method Statement (other than in Section 6).

Biosecurity

- 1.6 Marches Ecology (2018 & 2020) state that '*Due to the presence of Ash dieback on the site basic biosecurity measures will be implemented*'. Further information submitted in support of the planning application⁴ also confirmed that the biosecurity measures would be in accordance with the ARG-UK Advice Note 4⁵. Appropriate biosecurity measures are provided in Section 7.

¹ 'EU legislation which applied directly or indirectly to the UK before 11.00 pm on 31st December 2020 has been retained in UK law as a form of domestic legislation known as 'retained EU legislation'. This is set out in Sections 2 and 3 of the European Union (Withdrawal) Act 2018' - <https://www.legislation.gov.uk/>

² Marches Ecology (2018). *Proposed Development at Lloyds Animal Feeds, Bridge Road (North), Wrexham Industrial Estate, Wrexham – Preliminary Ecological Appraisal*. Produced on behalf of HDS Architectural Services.

³ Marches Ecology (2020). *Proposed Raw Material Intake/ Cleaning and Weighing House, Lloyds Animal Feeds, Bridge Road (North), Wrexham Industrial Estate, Wrexham – Ecology Addendum*. Produced on behalf of Lloyd's Animal Feeds.

⁴ Marches Ecology (2021). *Proposed Raw Material Intake/ Cleaning and Weighing House, Lloyds Animal Feeds, Bridge Road (North), Wrexham Industrial Estate, Wrexham – Ecology; Additional Information*. Produced on behalf of Lloyd's Animal Feeds.

⁵ *Amphibian & Reptile Groups of the United Kingdom Advice Note 4 – Amphibian Disease Precautions: A guide for UK Fieldworkers*. Version 2, revised March 2017. Available at: <https://www.arguk.org/info-advice/advice-notes/324-advice-note-4-amphibian-disease-precautions-a-guide-for-uk-fieldworkers-pdf-2>

Project Background

- 1.7 The proposal concerns a small extension on the southeast side of the existing building complex along with conveyors and elevators to transport raw materials to the existing storage bins. The new building would be 21 m long by 7 m wide and up to approximately 17 m high.
- 1.8 The existing area of hard-standing would also be extended to accommodate heavy goods vehicles accessing this new structure (though this is not shown on the plan provided). It is understood that the area of hard-standing would be extended in line with/ parallel to the northeast elevation of the new building, to the southern site boundary. This hard-standing would be approximately 22 m long by 23 m wide (at its widest point on the southern boundary).
- 1.9 An Altrech Ltd plan entitled '*Preliminary Arrangement for Proposed New RM Intake/ Cleaning & Weighing House*', drg. No. E220125, dated 17/09/20, provides a layout for the proposed extension.

Retained Habitat Corridor

- 1.10 It is proposed to provide a 4 m wide habitat corridor across the site as detailed in Marches Ecology (2021). *Figure 1* (attached to the end of this Method Statement) presents the proposed habitat corridor to be retained. This corridor currently supports a mosaic of tall ruderal vegetation, scrub, broad-leaved woodland and scattered trees.
- 1.11 A hibernaculum would be created within this corridor. It would comprise materials retrieved from the proposed development site. The hibernaculum would be a minimum of 2 m long, 1 m wide and 1 m high in accordance with the design provided in English Nature (2001)⁶. An indicative location for this hibernaculum is shown on *Figure 1*.

2 Risk Assessment

Introduction

- 2.1 An ecology walkover survey was completed at the site on 19th November 2020 by Tom Knight of Marches Ecology. The purpose of this survey was to update the findings of the Preliminary Ecological Appraisal specific to the smaller area concerned with the current proposal. The survey involved assessment of the potential value of the habitat for protected/ other notable species including for Great Crested Newts. The weather during the survey was 25% white cloud, bright sunshine and occasional rain showers with a light breeze.
- 2.2 An Altrech Ltd plan entitled '*Preliminary Arrangement for Proposed New RM Intake/ Cleaning & Weighing House*', drg. No. E220125, dated 17/09/20, provides a layout for the proposed extension. For the purpose of this walkover survey a survey area was defined to include the immediate footprint of the proposed extension (including likely extent of new

⁶ English Nature (2001). *Great Crested Newt Mitigation Guidelines. Version: August 2001*. English Nature, Peterborough.

hard-standing) plus up to approximately 30 m around this (where access allowed⁷). The results of the survey (with regards Great Crested Newts) are further described below.

Summary Evaluation of Risk to Great Crested Newts

Habitat Assessment

2.3 The proposed development site includes the following habitat resources:

- Species-poor unmanaged neutral grassland;
- A mosaic of tall ruderal/ species-poor unmanaged neutral grassland;
- Ephemeral vegetation over limestone hardcore;
- Scrub;
- Tall ruderals;
- Metal shipping containers on a concrete base; and
- Hard-standing.

2.4 The sparse ephemeral vegetation over limestone hardcore includes a small patch of unmanaged species-poor neutral grassland. The latter is dominated by *Dactylis glomerata* (Cock's-foot) and *Arrhenatherum elatius* (Fales Oat-grass). This area was previously mapped as thin strips of amenity grassland and unimproved neutral grassland.

2.5 Small fragments of species-rich unimproved neutral grassland with scattered shrubs were recorded in 2018 but have since been removed/ disturbed adjacent to the new building (that was the subject of the application in 2018). This strip is approximately 7-8 m wide adjacent to the building and is characterised by limestone hardcore/ rubble with sparse ephemeral vegetation.



Sparse ephemeral vegetation over limestone hardcore.

⁷ Access was not gained to the following areas within the survey site: part of the 30 m buffer lies outside the Lloyds Animal Feeds site boundary to the south. This is not considered to have any significant implications to the validity of the walkover survey in the context of the proposal.

- 2.6 There is a mosaic of tall ruderal/ species-poor unmanaged grassland previously recorded in 2018 as ephemeral vegetation. It is dominated by *Holcus lanatus* (Yorkshire-fog) with abundant *Ranunculus repens* (Creeping Buttercup), frequent *Rumex crispus* (Curled Dock), occasional *Leucanthemum vulgare* (Oxeye Daisy), *Epilobium hirsutum* (Great Willowherb), *Cirsium arvense* (Creeping Thistle) and *Centaurea nigra* (Common Knapweed). *Rubus fruticosus* agg. (Bramble) scrub is encroaching into this area.



Part of the tall ruderal vegetation.

- 2.7 There is a mound of tipped soil/ spoil material on an area recorded in 2018 as small fragments of much disturbed species-rich unimproved neutral grassland. This area is now patchily vegetated with ephemeral species, tall ruderals and some tall grasses.



Part of the earth mound.



A view from the earth mound towards the proposed development site (in front of right-hand silo).

- 2.8 There is a patch of dense scrub as previously recorded (no change). The scrub includes locally abundant *Cornus alba* (White Dogwood) with frequent *Rubus fruticosus* agg. (Bramble) and a small amount of *Rosa canina* agg. (Dog-rose).



Ephemeral vegetation/ hardcore in the foreground with the scrub in the left background.

- 2.9 A large pile of brash as was recorded in 2018 (no change).



Brash pile.

- 2.10 There are various areas of hard-standing around the building complex. The hard-standing is largely surfaced with concrete and hardcore.
- 2.11 Parts of the terrestrial habitat (unmanaged grassland, scrub and stands of tall ruderals) within the proposed development site is of moderate to high potential value for Great Crested Newts. The various piles of rubble, stored materials, pallets, wood chippings, logs and brash as well as building foundations and the edges of hard-standing within the proposed development site provide potential refugia/ hibernacula that could be utilised by Great Crested Newts.

Status of Great Crested Newts in the Area

- 2.12 There is no aquatic habitat within the site.
- 2.13 A review of the OS map 1:25, 000 scale and relevant internet-based mapping including aerial photography⁸ indicates that there are two waterbodies within approximately 250 m of the proposed development site (excluding ditches/ watercourses) and six further waterbodies within 500 m of the proposed development site were identified during the desk study conducted in 2018. A detailed pond scoping exercise has not been undertaken although Marches Ecology is able to confirm that both waterbodies remain present.
- 2.14 The closest waterbody to the proposed development site is located approximately 135 m to the west, on the opposite side of Bridge Road (North). The second waterbody is located approximately 195 m to the north and is within an ecological mitigation area. The former waterbody is known to have supported Great Crested Newts.
- 2.15 Cofnod provided a large number of records for Great Crested Newt from a 1 km search area during the desk study conducted in 2018. The closest of these records to the proposed

⁸ <https://www.google.co.uk/maps/place/Wrexham/@53.0402077,-2.9228601,698m/data=!3m1!1e3!4m5!3m4!1s0x487ab5d05739375d:0xd575606934cc778c!8m2!3d53.04304!4d-2.992494>

development site are from a large waterbody at the corner of Ash Road South, on the opposite side of Bridge Road (North) to the site, and approximately 135 m away. The most recent of the records from this waterbody is from 2012 and concerns a maximum count of two individuals. Most of the records are from the east/ northeast of the proposed development site, although there are also clusters of records to the south and west.

Summary

- 2.16 The potential presence of Great Crested Newts in terrestrial habitat is governed more by the proximity of a suitable breeding waterbody than by the quality of the terrestrial habitat. There are two waterbodies within approximately 250 m of the proposed development site with the closest being approximately 135 m away to the west. Great Crested Newts have previously been recorded from at least one of these waterbodies.
- 2.17 Due to the number of waterbodies in this part of Wrexham Industrial Estate, and the recorded presence of Great Crested Newts in many of them, it is possible that individual Great Crested Newts could be found more-or-less anywhere in this area. However, based on the low quality of some of the habitat within the proposed development site, that the two closest waterbodies are on the opposite side of Bridge Road North (which would present something of an obstacle to the movement of newts, albeit not absolute), the low number of waterbodies within this part of Wrexham Industrial Estate and the likely short duration of the construction phase, the risk that individual Great Crested Newts may be found on the proposed development site is considered to be low.
- 2.18 As the risk to individual Great Crested Newts is considered to be low this RAMs Method Statement details a precautionary approach to avoid any impacts on [individual] Great Crested Newts. Subject to appropriate implementation of this RAMs scheme no impacts due to the proposal on the Favourable Conservation Status of the local Great Crested Newt population are envisaged.

3 Great Crested Newt Legislation

- 3.1 This sub-section provides a brief summary of key legislation relevant to Great Crested Newts and is current at 2nd March 2021. It should not be considered a comprehensive review and is not meant to be so. It is provided here for information only and is not intended to replace specialised legal advice. It does not replace the text of the legislation but summarises the salient points.
- 3.2 Great Crested Newts are listed on *Schedule 5 of the Wildlife and Countryside Act 1981* (as amended)⁹, and receive full protection under *Section 9*. The 1981 Act was amended by the *Countryside and Rights of Way Act 2000*¹⁰ which further extends the protection. They are also listed as European Protected Species on *Schedule 2 of The Conservation of Habitats and Species Regulations 2017* which gives it full protection under *Regulation 42(1)*. The legislation applies to all life stages of the Great Crested Newt, including eggs, larvae, juveniles and adults.

⁹ HMSO (1981). *The Wildlife and Countryside Act 1981*. HMSO, London.

¹⁰ HMSO (2000). *The Countryside and Rights of Way Act 2000*. HMSO, London.

3.3 Under the above legislation it is an offence to intentionally or recklessly:

- kill, injure or take an individual of such a species;
- possess any part of such species either alive or dead;
- damage, destroy or obstruct access to any place or structure used by such species for shelter, rest, protection or breeding;
- disturb such a species whilst using any place of shelter or protection; or
- sell or attempt to sell any such species.

3.4 The Great Crested Newt is included on *Section 7* of the *Environment Act 2016*¹¹.

4 Great Crested Newt Identification

4.1 This sub-section of the document is provided for reference in the event that any amphibians are found on site during the proposed vegetation clearance/ development and while the ecologist is not present. It will be discussed with all site personnel prior to the start of work. Identification of any newts that may be found is likely to require the confirmation of a suitably qualified ecologist¹².

4.2 Great Crested Newts are the largest of the three British species of newt; adult males can reach 15 cm in length, with females slightly larger at 18 cm. The upper surface and flanks are dark brown/ black and distinctly warty, with a row of white/ silver dots present along the side of the head and body. Males develop a characteristic jagged dorsal crest (which has a marked break where the tail joins the body) during the breeding season (although this lies flat when on dry land). The belly is dark orange or yellow with a distinct pattern of black blotches. The throat is whitish and thickly spotted with brown/ black.



Male Great Crested Newt on land (above) and female (below).



4.3 The Great Crested Newt may be confused with the Smooth Newt (*Lissotriton vulgaris*), although adults of this species are generally smaller (at 10-11 cm). Although the male Smooth Newt develops a dorsal crest, this is unbroken from head to tail and is also undulating, as opposed to jagged. The male has brown/ olive green or tan skin with black

¹¹ HMSO (2016). *The Environment Act (Wales) 2016*. HMSO, London.

¹² The ecologist should hold a current Natural Resources Wales 'survey/ disturbance' licence.

spots and the female a light brown colouration with darker spots or speckles. The belly of both the male and female is creamy yellow or orange, and the throat slightly lighter, both with dark spots or speckles.



Male Smooth Newts on land.

- 4.4 The third species of British newt is the Palmate Newt (*Lissotriton helveticus*). It is slightly smaller than the Smooth Newt at 7-11 cm in length, although it is superficially similar. The two species can be difficult to distinguish, particularly females. The male Palmate Newt has a much less developed dorsal crest (which is also straight edged as opposed to undulating) than a male Smooth Newt. The male Palmate has a 4-7 mm tail filament and black frills / well developed webbing on the hind feet. Typically, the throat of males and females is pure white/ pinkish and very rarely spotted (in contrast to Smooth Newts).

5 Great Crested Newt Ecology

- 5.1 This sub-section of the document is provided as a brief introduction to the ecology of Great Crested Newts. It is not a substitute for detailed knowledge and experience of working with the species.
- 5.2 Great Crested Newts live both in water (aquatic habitat) and on land (terrestrial habitat). Aquatic habitat is required for breeding and feeding. Terrestrial habitat is required for foraging (for food) and for hibernation during the winter. They can be present in their breeding waterbody between spring and autumn but individuals often spend less time than that in aquatic habitat. The remainder of the year is spent on land. Some adults will migrate back to their breeding waterbody as early as late January but most move later, in March. Adult newts generally leave the waterbody from late May onwards.
- 5.3 Adult females lay eggs individually on submerged plants and can lay 200 eggs in a season. Larvae hatch after about three weeks and take another two to three months to complete their development. While some juveniles leave the waterbody (usually from August onwards) in this first year (and hibernate on land) some will over-winter in the waterbody.
- 5.4 Great Crested Newts hibernate during the winter often underground amongst tree roots, in mammal burrows, down the side of walls/ house foundations, in cellars, and beneath piles of stones/ logs, etc. Hibernation may last from October to February. While on land and outside the hibernation period, Great Crested Newts require refuge from extremes of weather. During the day they will rest in dense vegetation, under refuges (logs, etc), or underground. They will emerge from these refuges at night to forage and or migrate.

6 Method Statement

Preparatory

- 6.1 This RAMs Method Statement will be discussed in detail with all personnel/ contractors involved with the proposed development before any works are carried out. This will take the form of a toolbox talk/ site meeting to be presented by the ecologist and will incorporate advice with regard to the identification features of Great Crested Newts and the procedure that should be followed if a Great Crested Newt or reptile is discovered during any works. This information will be incorporated into all subsequent site inductions for new personnel/ contractors.
- 6.2 Before any works commence a copy of this method statement will be issued to all site personnel/ contractors and a signed copy will be retained by the ecologist. The contact details of the ecologist responsible for implementing this RAMs Method Statement will be provided to all site personnel before the start of work. This method statement must be strictly adhered to by all site personnel/ contractors involved with the proposed development.
- 6.3 Should a Great Crested Newt or reptile be located during implementation of the RAMs then it would be moved away from the immediate work area by the ecologist and relocated for welfare reasons only to a suitable receptor site. All work would then be suspended until further notice and Natural Resources Wales (NRW) consulted. It is possible that in this instance or if a Great Crested Newt is found at any other time during the work, an NRW 'development' licence may be required in order to lawfully proceed. Work should not recommence until the ecologist has provided such confirmation. Other amphibians that may be found during the implementation of the RAMs scheme would also be moved to the 'receptor' site.
- 6.4 A record of the implementation of the approved avoidance/ mitigation measures will be maintained by the ecologist. A simple spreadsheet log will be used to record evidence. This log can be made available to representatives of Wrexham County Borough Council (WCBC) and NRW on request or as required.

Working Protocol

Timing/ Weather Conditions

- 6.5 Implementation of the Great Crested Newt/ reptile RAMs should only be undertaken when the preceding and following night-time temperature does not fall below 5°C and the day-time temperature is warm.

Temporary Protective Fencing

- 6.6 Areas of grassland/ scrub adjacent to the proposed development site will be separated from construction activities with suitable temporary protective fencing, e.g., heras. The purpose of this fencing will be to protect other habitat that is suitable for amphibians and reptiles from inadvertent damage. This fencing will be installed prior to the commencement of any works including vegetation clearance as part of the RAMs. No access/ storage of materials/ construction work, etc will be allowed beyond this fence. The less frequently managed grassland/ scrub outside the fence should be retained undisturbed; excess soil should not be spread in this area. The alignment of this protective fence will be discussed with, and confirmed by, the suitably qualified ecologist. Site construction personnel would be made

aware of the importance of this fence during the toolbox talk and that no access would be allowed beyond it.

Potential Refugia Within the Site

- 6.7 Potential refuges within the proposed development site (including shrub stumps, piles of logs, brash, rubble, edges of hard-standing, etc) will be subject to a hand-search by the suitably licensed ecologist. It may also be necessary to undertake destructive searches on some of these features using an excavator under the supervision of the ecologist. Any areas of concrete/ solid hard-standing that are to be removed will be carefully extracted under the supervision of the ecologist who will check beneath them. All cleared materials should be immediately removed from the site.
- 6.8 Some of this work may be possible prior to the phased vegetation clearance detailed below. Most will be undertaken as the vegetation clearance proceeds or after its completion.

Vegetation Clearance

- 6.9 Prior to the start of any work associated with the proposed development all vegetation within the proposed development site will be cut/ removed. This will be undertaken in a methodical manner, starting from one side of the work area, and cutting vegetation in one direction. The cutting will ideally work towards areas of adjacent suitable habitat. This process may encourage the movement of reptiles into adjacent suitable habitat.
- 6.10 This work will be supervised by the ecologist where deemed necessary and hand-searches of particular habitat features will be undertaken. Initially the grass will be cut no lower than 10-15 cm above ground level. Cut material should be raked up and removed from the site. All arisings from this clearance work should be removed from the proposed development site within the same day.
- 6.11 Further to the vegetation being cut down to approximately 10-15 cm above ground level the ecologist will then undertake a visual-/ hand-search. This search will concentrate in particular on any potential refugia. Any potential surface refugia that can be easily moved (such as rocks, wood, etc) will also be removed from the area. Further to this, any remaining vegetation will be cut to ground level, again using hand-held tools and raked up (using a spring-tined rake or similar). This will ensure, as far as is reasonably practical, that the surface of the work area is unsuitable for Great Crested Newts/ reptiles.
- 6.12 Following cutting of the grass and the associated visual/ hand-searches all vegetation should be mechanically stripped on the same day. This vegetation strip would be undertaken with a tracked excavator using a toothed digging bucket. The vegetation will be stripped in a systematic manner in one direction. Stripped vegetation/ soil should be immediately removed from site. If this is not possible and the material would be stored on site then soil mounds should be subject to compaction on creation. This will ensure, as far as is practicable, that the creation of potential refugia associated with the mounds is limited; this will be subject to review by the ecologist. If the footprint of the soil mound has not previously been subject to a vegetation/ soil strip, a visual/ hand-search will be undertaken by the ecologist prior to installation of the soil mound. The ecologist would also need to supervise the eventual removal of the soil mound.

General

- 6.13 The ecologist will undertake a visual/ hand-search prior to the initiation of any work at the start of the construction period (after the vegetation clearance works detailed above). It will focus on the footprint of the proposed development as well as any immediately adjacent areas that may be used for storage of materials, vehicles or machinery.
- 6.14 At times when there is less/ no risk to Great Crested Newts/ reptiles the ecologist will remain on stand-by (off-site) for the duration of the development; site contractors will be responsible for implementing a watching-brief. This will entail a brief visual search of the site each day prior to any works being initiated. When stored materials are moved, particular attention will be paid to determine if any amphibians/ reptiles are located underneath.
- 6.15 Should a newt or reptile be found during the work (and the ecologist is not present at the site) on-site contractors will halt all activity immediately, contact the ecologist and wait until the ecologist arrives to remove the newt/ reptile to an appropriate location. If any newt or reptile is found during the work the ecologist should be called to confirm identification before any action is taken. If other amphibians such as Common Frog or Common Toad are found during work, and confidently identified, then on-site contractors can move it to an appropriate location (firstly making sure their hands are damp). If any reptiles are found, on-site contractors should not attempt to move them, but should contact the ecologist.
- 6.16 In addition to that outlined above, the following measures will be undertaken:
- The contractor's compound including all machinery, materials and other associated paraphernalia will be located on areas of hard-standing at all times;
 - No machinery/ vehicles will access any area outside that which has been subject to vegetation/ soil stripping and the temporary fence to undertake work associated with the proposed development unless under supervision by the ecologist where necessary;
 - Prior to leaving the site at the end of each day, all tools and other materials will be stored securely either off-site or located on hard-standing/ within secure facilities;
 - Any spoil or other loose material that may be stored on site overnight must be placed on plastic sheeting on top of a pallet (or similar) or in a skip so that it is raised off the ground. Where this is not possible it must either be removed from site or be located on hard-standing where possible and be compacted;
 - Should any holes/ excavations be left on site overnight a suitable ramp (e.g., plank of wood) will be placed, with a slope of no more than 45°, so as to provide newts/ reptiles with a means of escape. The hole would be subject to a visual search (for amphibians/ reptiles) in the morning by site personnel;
 - Machinery and vehicles will be located on hard-standing overnight;
 - Any servicing or repair of machinery or vehicles will be carried out on areas of hard-standing; and
 - Refuelling of machinery or vehicles will also be carried out in accordance with the appropriate Environment Agency Guidance for Pollution Prevention and all other relevant pollution guidance.

- 6.17 The ecologist overseeing this project is Tom Knight (Marches Ecology) who can be reached on 07928 212545. In the event that the ecologist cannot be contacted, please contact Max Ellson on 07950 220188.

7 Biosecurity Measures

Introduction

- 7.1 Biosecurity risks at the site are limited to the potential for invasive non-native species (INNS)/ diseases (e.g., Ash dieback which is caused by the fungus *Hymenoscyphus fraxineus*) to be transferred on/ off and within site. As Great Crested Newts and other amphibians may be present on the site it will be important not to transfer amphibian diseases on/ off-site. Further to the appropriate implementation of the control measures this risk is likely to be deemed 'acceptable'.
- 7.2 The publication: Scottish Government (2010). *Biosecurity guidance for SEARS staff*. Revised October 2010; describes four levels of biosecurity control dependent on the perceived risk of the activity. It is considered that the proposed works require Level 1 (Low Risk) biosecurity control as described in this guidance document and the general control measures detailed below are provided on this basis. The SEARS guidance and Forestry Commission (2012)¹³ are useful sources of general information on biosecurity.
- 7.3 This Method Statement will be issued to the Construction Site Manager (or equivalent) and it will be discussed with all contractors/ sub-contractors as part of a Tool-box Talk/ site induction. It will also be made available on site at all times.

Amphibian Diseases

- 7.4 A number of amphibian diseases have caused concern in recent years, in particular the chytrid infection and ranavirus. The chytrid fungus has been recorded from Talacre and Johnstown in 2008. Spread of these diseases is largely associated with the handling of amphibians or activity at waterbodies. However, it is also possible that spores may be transported on to/ from a site on contaminated footwear, equipment and vehicles/ machinery.
- 7.5 There is the potential for diseases to be transferred to amphibians that may use the habitat within the site. Personnel associated with the RAMs scheme/ subsequent construction and associated machinery/ equipment that will be used on site have the potential to transfer amphibian diseases on/ off-site. At present the biosecurity risk posed by the development to local amphibian populations due to the potential for the spread of diseases is considered to be low. The general control measures detailed below are considered appropriate to address this level of risk.

¹³ Forestry Commission (2012). *Biosecurity Guidance*. Forestry Commission, Edinburgh.

General Control Measures

7.6 To minimise the risk of spreading INNS/ diseases to/ from the site the following precautions should be put in place and adhered to by all site personnel:

- 1) An appropriate location for the cleaning of machinery/ footwear as detailed below will be identified prior to the start of any works at the site. These facilities will be maintained throughout the construction phase.
- 2) All machinery/ equipment to be used on the site will be assessed in terms of sites where it has been previously utilised. Should invasive plant species have been, or may have been, present, all machinery/ equipment will be thoroughly cleaned using brushes/ a pressure-washer (at an appropriate off-site, hard-standing, location) prior to being utilised on the site. All soil and other debris/ vegetation will be removed. As part of good machinery hygiene this approach should ideally be followed at all times.

Should the machinery/ equipment have previously been used in a waterbody then the procedure detailed above would be followed. In addition, the machinery/ equipment will be disinfected (e.g., with Virkon) in accordance with the guidance provided in the ARG-UK Advice Note 4.

When using disinfectant, the instructions should be read and safety information implemented, use should be in accordance with the instructions, contact with eyes and skin should be avoided and personal protection equipment should be worn as necessary.

- 3) The machinery utilised for the work will remain on-site for the duration of the work. On completion of the work the machinery will be thoroughly cleaned using brushes/ a pressure-washer. All soil and other debris will be removed from, in particular, the tracks, undercarriage and arm/ attachment. This will be undertaken on hard-standing within the site. Hand-tools/ other equipment should similarly be cleaned.

- 4) Refuelling of machinery or vehicles will be carried out in accordance with the appropriate Environment Agency Guidance for Pollution Prevention and all other relevant pollution guidance.

- 5) No vehicles will be allowed on site (areas where there is exposed soil/ substrate/ vegetation) unless they are required for the construction works. All other vehicles will be parked on existing areas of hard-standing.

- 6) Each contractor will use the same pair of footwear for the duration of the work and this footwear will be kept in the site compound throughout or will be thoroughly cleaned at the end of each day. This footwear will be cleaned using brushes and water/ a pressure-washer (on an area of hard-standing) prior to being utilised on the site. On completion of the work or at the end of each day all footwear will be thoroughly cleaned again at the same location. All soil and other debris will be removed from the footwear to avoid transferral of seed/ plant fragments to other sites.

As mentioned above should the contractor have entered any waterbodies on a previous site the footwear will be disinfected in accordance with the guidance provided in the ARG-UK Advice Note 4.

- 7) Visitors (particularly those that will subsequently attend other sites) must clean their footwear before attending the site. The footwear used while accessing the work site must not be used when visiting other work sites until it has been thoroughly cleaned.

Other than where machinery/ footwear has entered a waterbody on a previous site it is currently considered unnecessary for anybody else accessing the site to disinfect their footwear/ vehicles - biosecurity hygiene being limited to cleaning with a brush/ water as described above.

The above detailed measures are considered sufficient with regards the control of Ash dieback. No plant material should be removed from the site.

Control Measures for Amphibian Diseases

7.7 The ARG-UK Advice Note 4 provides further information on precautions to be taken to minimise the risk of spreading amphibian diseases. This Advice Note should be followed when undertaking any work at the site, or where amphibians may be handled. To minimise the risk of inadvertently spreading amphibian diseases, the following additional precautions should be put in place and adhered to by all site personnel:

- 1) All personnel will be questioned about their recent movements. Any footwear that may have been used on sites with amphibian populations, or whose owners keep non-native amphibian species in captivity, will be subject to appropriate cleaning/ disinfection prior to being utilised on the site.
- 2) The recent use of all machinery/ equipment on other sites will be reviewed. Any that may have been used recently on site(s) with amphibian populations will be subject to appropriate disinfection prior to being utilised on the development site. In addition, all buckets *etc.*, used for transfer of amphibians, will be regularly disinfected.
- 3) Disinfection, if required, should follow the procedure provided in ARG-UK Advice Note 4 (refer to footnote 9, page 4): Use a brush to scrub off any debris, plant fragments, mud *etc.* and rinse with water. Then disinfect using one of the following methods: 1) Soak/ wash in a bleach solution (diluted with water to produce a 4% solution) for 15 minutes; OR 2) Virkon (10 mg/ml, as per supplier's instructions) for 1 minute. Rinse with clean water and if possible, allow to dry.
- 4) Should any diseased amphibians be located or suspected, the RAMs scheme will be halted and Amphibian and Reptile Conservation (ARC) (<https://www.arc-trust.org/>) NRW contacted for further advice. Works will only re-commence when it is confirmed that it is safe/ acceptable to do so.

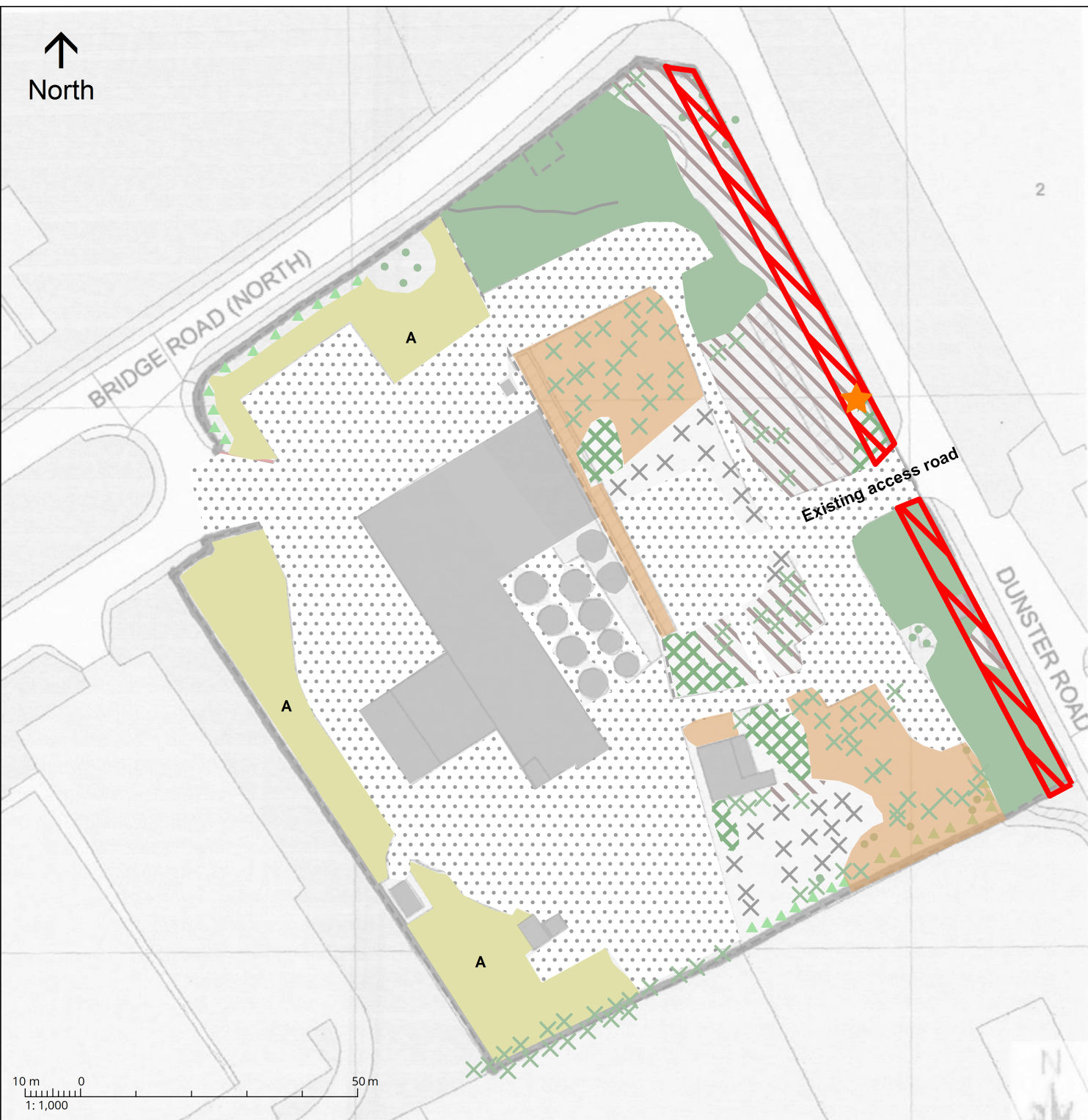
Handling Amphibians

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

- Handle amphibians only when necessary.
- If handling amphibians, or if contact with pond water is necessary, wear powder-free disposable vinyl gloves which you rinse before contact with the amphibians. Use vinyl rather than latex or nitrile because the latter two may be harmful to amphibians.
- Use a fresh pair of gloves for each site (pond/ waterbody) visited.
- Ensure that all workers wash their hands thoroughly with soap or hand sanitising gel and water after each day/ before moving to another site.
- Wash all clothing on a 40°C cycle with biological detergent, after exposure to amphibians or pond water.
- Do not release amphibians anywhere except at the place of capture.

I have read and understand the requirements of this method statement.

[illegible]



Proposed habitat corridor for retention

4 m wide. [Note: this plan should not be relied upon for measurement purposes on site]



Indicative location of hibernaculum

Extended Phase 1 mapping completed in 2018 shown in pale colours.

This has been kept as per the original, with the exception of the buildings within the current survey site which have been updated.

**C435 Proposed Raw Material Intake/
Cleaning and Weighing House, Lloyds
Animal Feeds, Bridge Road (North),
Wrexham Industrial Estate, Wrexham -
Great Crested Newt and Reptile
Reasonable Avoidance Measures Method
Statement**

Figure 1 - Habitat Corridor for Retention

Date: 02/03/2021

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