

Risk Avoidance Measures (RAMS) for CeramTec perimeter fencing

Location:

The CeramTec site is located on Vauxhall Industrial Estate in Ruabon, Wrexham (OS Grid Ref. SJ. 305 455), adjacent to the Stryt Las A'R Hafod SSSI/Johnstown Newt Sites SAC.

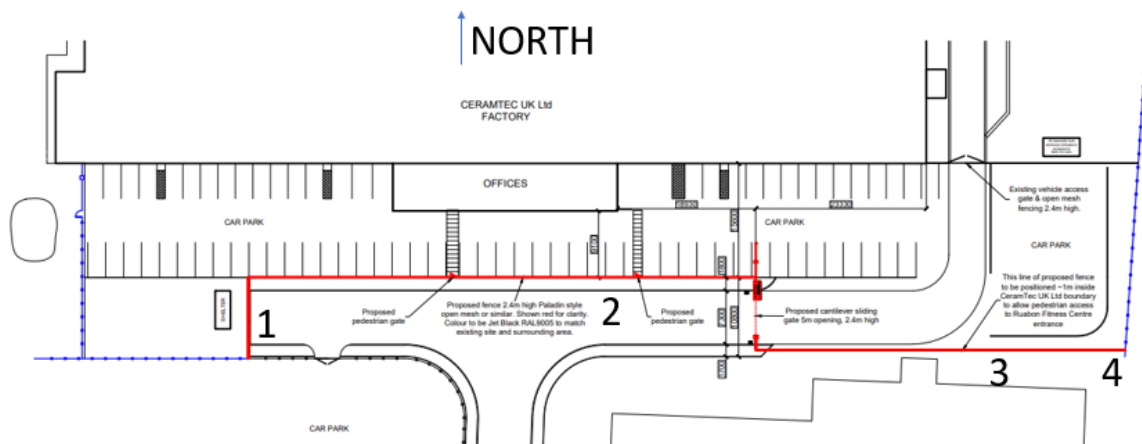
Background:

SITE DESCRIPTION

The CeramTec site is located on Vauxhall Industrial Estate in Ruabon, Wrexham (OS Grid Ref. SJ. 305 455), adjacent to the Stryt Las A'R Hafod SSSI/Johnstown Newt Sites SAC. The site consists of: the factory building, car parking and associated roads/hard standing and gravel (centre of plot and eastern side), three areas of GCN mitigation (eastern and northern boundaries), and a thin strip of rough vegetation (southern boundary). Wild Ground have monitored and managed the mitigation area since their creation in 2011.

PROJECT DESCRIPTION

CeramTec propose to extend their existing perimeter fencing (marked in blue), connecting the fence on the southern perimeter with that on the north-western edge, to encase the parking area and front-of-building. Proposed fencing is of Paladin style open mesh or similar with a cantilever sliding gate (see "RUA FenceDetailsGAP01 existing and proposed elevations"). The new fencing will be installed along the red line marked on this diagram.



All sections of proposed new fencing are numbered on the above diagram, and illustrated in the photos below:

Figure 1. Western Fence Location (1)



Figure 2. Western Fence Substrate (1)



Figure 3. NorthernFence Location (2)



Figure 4. Northern Fence Substrate (2)



Figure 5. South-eastern Location (camera NW facing) (3)



Figure 6. South-eastern Location (camera NE facing) (3)



Figure 7. Eastern Location (4)



Figure 8. Eastern Location (4)



Objective and Benefits:

1. Secure the car park and premises (vandalism, theft, break-ins, etc).
2. Boundary fencing will mark ownership boundaries.

Timescale:

- Works will begin once all necessary permissions are in place.
- Construction is expected to last 4-6 weeks.
- Estate works of this type are not seasonally restricted by ecology so can be conducted throughout the year as required.

Identifying risks to GCN:

1. Disturbance, injury or death of newts through digging
2. Disturbance, injury or death of newts through vegetation clearance
3. Disturbance, injury or death of newts through vehicular access on site
4. Biosecurity – introduction of INNS or pathogens (e.g. ranavirus, Chytrid) to GCN habitat
5. Loss of GCN habitat area to infrastructure
6. Loss of connectivity between GCN habitat from infrastructure barrier

Method Statement and Reasonable Avoidance Measures:

1. There will be no habitat loss arising from these works. Underlying 'habitat' will remain intact following erection of the fence. Section 2 is entirely unsuitable habitat for GCN (tarmac). Sections 1 and 3 present potential refuge habitat only (shingle). Only Section 4 (c.3 m) supports vegetation. The vegetation cut back in Section 4 will regrow from the soil substrate.
2. The fence will not present a barrier to GCN – it is permeable at ground level at GCN scale. It also does not link suitable habitats, encapsulating a very busy tarmac car-parking area.
3. Risk of disturbance, injury or death of newts throughout the entirety of Section 2 is near zero; the tarmacked hard-standing of a busy car-park presents extremely unfavourable conditions for GCN.
4. To avoid risk of injury or death to any animals which may be present during vegetation clearance in Section 4, cut to a minimum height of 15cm with arisings removed. Allow 5+ days for animals to evacuate this newly (temporarily) less optimal habitat before cutting shorter to facilitate visual inspection prior to breaking ground.
5. Any cover objects detected will be removed in advance of breaking ground (only likely to be present in Section 4)
6. A visual check for GCN will be conducted before breaking ground at all points. Additionally, a fingertip search will be conducted in Section 4. **If GCN are detected works will be halted pending consultation with NRW and involvement of a suitably licenced ecologist.**
7. Digging small holes for fenceposts (i.e. disturbance to ground up to 1m depth) may be done either by hand or with mechanical assistance. Once excavated, holes will be filled same-day with fencing posts and backfilled. No open holes will be left overnight; they will either be temporarily filled back in or covered over with a hard cover to prevent anyone or anything falling in.
8. In this instance, use of heavy plant is not a concern as it can access the work area entirely from the tarmacked road/car-park/hard-standing, and does not need to traverse bare or vegetated ground, avoiding direct or compression injury risks to GCN.
9. Mixing of lime-based concrete/ cement mixes will be done with care, in situ or on hard standing, and never in high winds or within the banks of a breeding pond. Dry mixes will be used if run off is a possibility.
10. **NOTE: IF GCN ARE DISCOVERED AT ANY POINT IN THE PROJECT WILL CEASE IMMEDIATELY PENDING CONSULTATION WITH NRW AND LICENCED ECOLOGISTS.**

BIOSECURITY RISK ASSESSMENT:**INNS:**

11. **Isolation.** This project poses a low biosecurity risk to existing site features due to its discrete and isolated nature. The ponds and mitigation areas on-site are not near the works area and

protected by existing fencing and gates, with no need for workers/contractors to cross these features. Similarly, the SSSI/SAC cannot be accessed directly from site.

12. **Discrete area.** The area to be fenced is mostly on hard-standing, separate from the ponds, mitigation areas, and SSSI/SAC, and with only a c.3m strip of vegetated rough ground within the works area. There is no wet-work (i.e. pond, ditch, etc) required, so risk of transferring INNS such as Azolla, Crassula or Elodea from off-site are negligible.
13. There are no records of these **INNS** species on-site, and the pond areas will not be accessed, so risk of transfer off-site is near-zero.

DISEASES:

14. The site is known to support all five widespread species of amphibians, which are vulnerable to a range of diseases including Ranavirus, Bd. and B.sal, of which Bd is known to be present within the wider amphibian population of Johnstown. Likelihood of disease transfer is reduced by working mostly within the car-park habitat and avoiding amphibian habitat and wet-work, but it cannot be completely ruled out.
15. To avoid risk of introducing novel diseases to the important local population any tools or machinery which will break ground must be cleaned of physical debris before entering and upon leaving site to remove any vegetation matter (seeds, plant fragments, etc). Additionally, any parts breaking ground surface must be disinfected with Virkon before and after leaving site to reduce risk of transferring Chytrid and other diseases between sites.
16. It is not proportionate to require regular site workers to disinfect footwear or vehicle tyres for this job given it is not an existing protocol for their day-to-day site use. However, if external contractors – who will by their nature work across multiple sites – are used, their footwear and vehicle tyres must be cleaned and sprayed per point 15 before arrival to and departure from site, as the risk of transfer between sites is greater in this context.

Participants:

Estate maintenance to be conducted by CeramTec staff or contractors in accordance with RAMS laid out here, and any additional Method Statements/Risk Assessments required for H&S.

Consultation:

- CeramTec (site owners)
- Wild Ground (ecologist)
- WCBC (planning permission)
- NRW (GCN method statements and biosecurity)

Prepared by:

Paul Furnborough of Wild Ground, on behalf of CeramTec

Date:

12/10/21