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Biosecurity Risk Assessment

**MILL COTTAGE
MARCHWIEL HALL
WREXHAM
LL13 0SS**

ON BEHALF OF: MR MARK CREIGHTON

DATE: APRIL 2021

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CHECKED BY MATTHEW WHITEHEAD**

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Section 1

Introduction

- 1.1 P J Ecological Solutions were commissioned by Mr Mark Creighton to compile a Biosecurity Risk Assessment of Mill Cottage, Marchwiell Hall, Wrexham, LL13 0SS (hereafter referred to as 'the site'). The site is centred on approximate Ordnance Survey Grid Reference SJ 34060 48269.
- 1.2 Planning permission for the change of use from business use to a single dwelling with internal and external refurbishment works, a two-storey extension, a basement extension and the erection of a replacement outbuilding was granted by Wrexham Borough Council on the 15th of October 2020 (planning reference number MAR P/2020/0106).
- 1.3 The plans also include some site and vegetation clearance of an overgrown residential garden.
- 1.4 Condition 8 states "No development, with the potential to impact on invasive species, shall commence until a site wide Biosecurity Risk Assessment has been submitted to and approved in writing by the Local Planning Authority. The risk assessment shall include measures to control, remove or for the long-term management of invasive species both during construction and operation".
- 1.5 The purpose of this report is to produce a Biosecurity Risk Assessment which will detail appropriate control measures for non-native invasive species (INNS) on Site during construction and operational phases of the Proposed Development, to prevent the spread of species onto Sontley Marsh Special Scientific Interest (SSSI) and an adjacent Ancient Semi-natural Woodland.
- 1.6 The findings of this report have been used to inform a planning application for the proposals of extensions and modifications to the existing buildings.
- 1.7 This method statement is a working document that should be reviewed and maintained throughout the construction period as a record of activities. It details measures to prevent the spread of invasive non-native plant species into the surrounding environment as a result of the construction works being undertaken.

Site description

- 1.8 Mill Cottage is located within the Marchwiell estate and consists of large country parkland with approximately 150 acres of woodland, farmland and mature gardens associated with the estate.
- 1.9 The cottage is a Grade two listed building (CADW Ref No. 17844) and is accessed via a private driveway of Marchwiell Hall.
- 1.10 The property is not situated within a conservation area but does form part of a small collection of buildings within a rural setting and is situated adjacent to areas of Ancient Semi Natural woodland (ASNW) and Sontley Marshes SSSI.

Section 2 Legislation

2.1 The Wildlife and Countryside Act 1981 (as amended) (HMSO, 1981), Section 14:

Introduction of new species etc.

(1) Subject to the provisions of this Part, if any person releases or allows to escape into the wild any animal which—

(a) is of a kind which is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state; or

(b) is included in Part I [F1, IA or IB] of Schedule 9,
he shall be guilty of an offence.

(2) 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) Subject to subsection (4), it shall be a defence to a charge of committing an offence under subsection (1) or (2) to prove that the accused took all reasonable steps and exercised all due diligence to avoid committing the offence.

(4) Where the defence provided by subsection (3) involves an allegation that the commission of the offence was due to the act or default of another person, the person charged shall not, without leave of the court, be entitled to rely on the defence unless, within a period ending seven clear days before the hearing, he has served on the prosecutor a notice giving such information identifying or assisting in the identification of the other person as was then in his possession.'

A list of Schedule 9 species can be found in Appendix 3.

Section 3 Methodology

Desk Study

3.1 A biological records search was undertaken from North Wales Environmental Information Services by Tyrer Ecological Consultants Ltd. The search included INNS of flora recorded within a 2km radius of the proposed site.

Field Survey

3.2 A field survey comprising an Extended Phase 1 Habitat Survey to identify any INNS was carried out on the 3rd and 31st of July by Tyrer Ecological Consultants the results of which are included within the report Phase 2 Habitat Survey with Dusk and Dawn Results – Redevelopment of Mill Cottage and Land – Tyrer Ecological Consultants (22nd August 2019) Unpublished.

3.3 A walk over survey was undertaken on the 5th of March 2021 by Paul Roberts assisted with Angela Pagett from P J Ecological Solutions.

Biosecurity Risk Assessment – Method and Measures

- 3.4 The basis of this biosecurity risk assessment report is based on the guidance detailed by Natural Resource Wales (NRW, 2020), and is laid out in line with the risk assessment template.
- 3.5 This risk assessment is to cover Biosecurity measures for the proposals on and adjacent to the site. The assessment also includes appropriate measures to control non-native species of plant listed under schedule 9 of the Wildlife and Countryside Act 1981. As such is an offence to plant or otherwise cause the species to grow in the wild. The presence of this plant prompts the requirement to control and where possible eradicate the species of flora.
- 3.6 Biosecurity is a set of precautions that aim to prevent the introduction and spread of harmful organisms which may include; pests, pathogens, or invasive species. For this report, the aim is to assess the risk and provide bio-security measures to prevent the spread of non-native invasive species to and from the site.

Section 4 Biosecurity Risk Assessment

Desk study

- 4.1 The local biological records centre (North Wales Environmental Information Services) provided records of the species shown in Table 1. identified within a 2km radius of the Site.

Table 1. Schedule 9 (HMSO, 1981) non-native invasive plant species identified within a 2km radius of the Site by the local biological records centre (North Wales Environmental Information Services).

Common Name	Scientific Name
Hollyberry Cotoneaster	<i>Cotoneaster bullatus</i>
Japanese Knotweed	<i>Fallopia japonica</i>
Variegated Yellow Archangel	<i>Lamium galeobdolon</i> subsp. <i>argenteum</i>
Rhododendron ponticum	<i>Rhododendron ponticum</i>
New Zealand Pigmyweed	<i>Crassula helmsii</i>
Montbretia	<i>Crocsmia pottsii</i> x <i>aurea</i> = <i>C. x crocosmiiflora</i>
Curly Waterweed	<i>Lagarosiphon major</i>
Wall Cotoneaster	<i>Cotoneaster horizontalis</i>
Himalayan Cotoneaster	<i>Cotoneaster simonsii</i>
Giant Hogweed	<i>Heracleum mantegazzianum</i>
Himalayan Balsam	<i>Impatiens glandulifera</i>

Statutory and Non-Statutory Wildlife sites

- 4.2 Sontley Marsh SSSI which is noted for its diverse invertebrate community lies immediately adjacent to the application boundary along with the River Clywedog

(LBAP Habitat) at 171 metres south of the site boundary and ancient woodlands to all aspects.

Field surveys

- 4.3 The habitats identified within the Site are scattered scrub, scattered trees, swamp, and buildings. Details of these habitats can be found within the Phase 2 Habitat Survey with Dusk and Dawn Results – Redevelopment of Mill Cottage and Land – Tyrer Ecological Consultants (22nd August 2019) Unpublished.
- 4.4 Two Schedule 9 INNS were identified during the survey on site or immediately adjacent to the site.
- 4.5 A precautionary check for INNS must be undertaken prior to commencement of the construction phase of the Permitted Development to ensure that no INNS have colonised the Site since the initial Site survey. Should INNS be identified on Site, these species should be removed from Site following guidance from Gov.uk: 'Stop invasive non-native plants from spreading' (DEFRA, 2019), prior to commencement of works.

Location and Nature of Hazard

- 4.6 Sontley Marsh SSSI lies immediately adjacent to the application boundary along with the River Clywedog (LBAP Habitat) at 171 metres south of the site boundary and ancient woodlands to all aspects.
- 4.7 Two invasive plant species were identified within the survey boundary in the form a Rhododendron (*Rhododendron ponticum*) and Variegated Yellow Archangel (*Lamium galeobdolon subsp. argentatum*).
- 4.8 They are both included in Schedule 9 of the Wildlife and Countryside Act 1981. Section 14 of this act makes it illegal to release any animal which is not native to Great Britain or those listed in Schedule 9 to the Act. It is also illegal to plant or otherwise cause to grow any plant listed in Schedule 9 in the wild.

Section 5

Risk and Control Measures

General Good Practice

- 5.1 Listed below is General Good Practice and to be followed on site by all personnel.
 - Arrive at the site with clean and disinfect footwear, equipment, and vehicle(s).
 - Before leaving the site remove mud, plants and other materials from boots, vehicles and equipment using a stiff brush and disinfect.

- Keep access routes to a minimum and whenever practicable, follow existing tracks.
- Whenever practicable, park on areas of hard standing.
- Restrict the amount of equipment you take onto site to the minimum required.
- If vehicles have entered an area where an INNS is known or suspected to be present, and have been taken off hard roads, ensure that the tyres and wheel arches are adequately cleaned and disinfected far away from drains and water courses and before leaving the site.
- Clean and disinfect all hand tools before leaving site.
- For disinfectant, Virkon solution is best made up using Virkon s (5mg) tablets, where one tablet is added to 500ml of water (2 to 1litre). This will then go pink and stay active for approximately 5 days. After this the pink colour will start to fade and the solution should be changed. Dispose of used solution safely (not surface water drain).

Activity Risk Assessment

Activity	Hazard/Risk description	Potential Risk level	Control Measures	Risk level after prevention
Site access/traffic movement	Potential spread of plant materials and soil	Medium	Limit access to the site area whilst ground works is undertaken. If it is necessary for a vehicle to attend the proposed area then wheel and boot washes are to be used.	Low to negligible
Further introduction of INNS from plant stock for landscaping	Plant parts and/or seeds introduced via new planting stock brought onto site	High	Written confirmation from the supplier that all new planting stock has been grown in an environment free from contamination by INNS.	Negligible
Identify areas within and adjacent	Potential spread of plant materials and soil	Medium	Before leaving the site remove	Low to negligible

to the site which contain the INNS species. Secure a 5 meter no work zone until the plant and corms are removed.			mud, plants and other materials from boots using a stiff brush and disinfect.	
Eradication of the stand of Variegated Yellow Archangel (<i>Lamiastrum galeobdolon</i> subsp. <i>argentatum</i>) from the site.	Potential spread of the schedule 9 species.	High to Medium	1. The plant will be removed with a fork from the affected area. 2. Placed into a sealed plastic container for carriage to the position of where a concrete platforms is to be positioned. 3. A minimum of a 2-meter-deep pit will be excavated, and the plant will be removed from the container and placed in the pit. 4. The soil will be returned on top of the plant.	Low to negligible

			5. During the construction phase of the project, concrete will further secure the area.	
Management of the Rhododendron (<i>Rhododendron ponticum</i>)	Potential spread of the schedule 9 species.	Low to Medium	Prepare a management plan to control the species. The plant is extensive within the area. Firstly, the plan should concentrate within the site and its boundaries	
Site Clearance	Plant parts and/or seeds spread throughout the site via mud on tools, boots, tyres, plant and machinery.	Medium - high	Measures must be introduced to eliminate Variegated Yellow Archangel. Prior to works commencing all areas containing these species must be clearly defined and excavation exclusion zones enforced.	Low to negligible.

Biosecurity risk assessment - Bats

- 5.2 All mitigation works are to be undertaken within or immediately adjacent to the site itself and there is no requirement to move bats or other species off-site. If bats are discovered (alive or dead) which have symptoms of white nose syndrome (*Geomyces destructans*) then NRW will be notified immediately, and works will cease until such times as advice has been given by NRW.

Section 6

Conclusion

- 6.1 This report details procedures to prevent the spread of INNS onto the site and the adjacent protected sites/habitats as a result of the Permitted Development, as required to discharge Condition 8.
- 6.2 Biological records of INNS have been returned from within 1km of the Site.
- 6.3 Two Schedule 9 INNS were identified during the survey on site or immediately adjacent to the site.
- 6.4 A precautionary check of the Site for the presence of INNS by a suitably qualified ecologist should be undertaken prior to commencement of works.
- 6.5 Provided that the control measures detailed in this report are adhered to, the threat of spread of INNS onto the SAC via the Permitted Development is considered to be minimal.