

Title	Proposed Raw Material Intake/ Cleaning and Weighing House, Lloyds Animal Feeds, Bridge Road (North), Wrexham Industrial Estate, Wrexham – Ecology; Additional information
Client	Lloyds Animal Feeds (Western) Ltd
Date of Method Statement	1st February 2021
Author	Tom Knight

1 Introduction

- 1.1 Lloyds Animal Feeds (Western) Ltd has submitted a planning application to construct a raw material intake/ cleaning and weighing house at their existing plant on Bridge Road (North), Wrexham Industrial Estate (approximate OS Grid Ref. SJ 383 496). The planning reference number for this application is (P/2020/0599).
- 1.2 An Ecology Addendum letter report¹ formed part of this submission. This letter report concludes that *'the terrestrial habitat within the proposed development site is of moderate to high potential value for Great Crested Newts'*. It recommends that implementing similar mitigation measures as were proposed in 2018² would be appropriate.
- 1.3 This note has been produced to provide further information on proposed ecology mitigation measures and to address concerns expressed by Natural Resources Wales (NRW) in their consultation response letter (Ref. CAS-133340-F0T9).

2 Background

2018 Planning Consent

- 2.1 Lloyds Animal Feeds (Western) Ltd submitted a planning application in 2018 for the erection of a raw material storage building at the plant on Bridge Road (North). It was a similar development to that currently proposed (in terms of the size of the footprint and the potential impacts on Great Crested Newts). This proposal was consented (Planning Ref. P/2018/0732) with the building being constructed in 2019.
- 2.2 Natural Resources Wales provided a consultation response at this time (NRW ref. CAS-70281-V7W4). NRW did not register an objection and recommended a condition be attached to require implementation of all the *'avoidance and mitigation measures described in the ecology report'*. Ergo the proposed ecological avoidance/ mitigation measures were accepted.
- 2.3 The 2018 consent included three key ecology-related conditions as follows:
3. *The development shall be carried out in accordance with the recommendation measures as set out in the approved ecological report of Tom Knight (Marches Ecology) dated 14.08.2018.*

¹ 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 Lloyds Animal Feeds.

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

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

5. No part of the development shall commence until details of the Ecological Clerk of Works (ECoW) have been submitted to and approved in writing to the local planning authority. The ECoW should be responsible for ensuring that all recommendations contained in the submitted ecological report referenced in condition no. 3 and additional great crested newt Reasonable Avoidance Scheme as required in condition no. 4 are delivered.

Condition 6 covered external lighting and though it is ecology-related it is not relevant to Great Crested Newts in this instance.

- 2.4 Further to receipt of the planning consent a Great Crested Newt and Reptile Reasonable Avoidance Measures Method Statement³ was produced to address condition 4. Marches Ecology was subsequently retained to ensure implementation of the RAMs Method Statement as well as the other mitigation measures detailed in the Preliminary Ecological Appraisal (to address conditions 3 and 5). As part of this implementation a Toolbox Talk⁴ document was produced and delivered to construction personnel by the ecologist.

3 Natural Resources Wales Consultation Response

- 3.1 NRW has provided a consultation response to the current application (NRW ref. CAS-133340-F0T9). In this response NRW stated that they have 'significant concerns' with the proposal, namely with regards potential impacts on Great Crested Newts. NRW recommended that a condition be attached to any consent requiring the submission of a 'GCN Conservation Plan'. The letter goes on to provide a bullet-point list of what said Conservation Plan should include.

4 Further Consultation

- 4.1 Due to concerns with the proportionality of the GCN Conservation Plan based on potential anticipated impacts on Great Crested Newts, Marches Ecology has contacted Emma Broad (Ecology and Biodiversity Officer, Wrexham County Borough Council) and Matt Ellis (Senior Species Advisor, NRW). The purpose of this further consultation was to address the concerns raised by NRW wherever appropriate, and identify what additional ecological mitigation measures might be required.
- 4.2 The mitigation measures proposed below are additional to those included in the Ecology Addendum letter report and are as agreed with both Emma and Matt.

³ Marches Ecology (2019). *Proposed Development at Lloyds Animal Feeds, Bridge Road (North), Wrexham industrial Estate, Wrexham – Great Crested Newt and Reptile Reasonable Avoidance Measures Method Statement*. Produced on behalf of Lloyds Animal Feeds.

⁴ Marches Ecology (2019a). *Lloyds Animal Feeds, Bridge Road (North), Wrexham industrial Estate – Ecology Toolbox Talk*. Produced on behalf of Lloyds Animal Feeds.

5 Avoidance/ Mitigation Measures

Proposed Additional Measures

- 5.1 The avoidance/ mitigation measures will include the following (with specific regard to Great Crested Newts):
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.
- 5.2 *Figure 1* (attached to the end of this note) 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. It provides terrestrial habitat of high potential value for Great Crested Newts. It is proposed to be 4 m wide. Retention of this corridor would ensure habitat connectivity across the site, allowing amphibians to traverse across it using suitable habitat with good vegetative cover. A hibernaculum would be created within this corridor. An indicative location for this hibernaculum is shown on *Figure 1*.
- 5.3 The hibernaculum would be created under the direction of the ecologist. 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)⁵. This hibernaculum is to be provided as an enhancement measure.
- 5.4 Appropriate biosecurity measures will be implemented throughout the proposed construction phase. The implementation of basic biosecurity measures was recommended in the Ecology Addendum letter report. The 2019 RAMs Method Statement included appropriate biosecurity measures in accordance with advice provided in the ARG UK Advice Note 4⁶. It is proposed to adopt the same approach: biosecurity measures will be included in an updated RAMs Method Statement.
- 5.5 The NRW consultation letter states '*We are aware of invasive species such as Himalayan Balsam and Japanese Knotweed being recorded in the environs of the application site (on the banks of the River Clywedog)*'. The River Clywedog is approximately 585 m away from the proposed development site at its closest point. A background data search was conducted as part of the 2018 Preliminary Ecological Appraisal with records of *Schedule 9*⁷ plants considered at this time. No *Schedule 9* plants have been recorded from the proposed development site either in 2018 or in 2020. As such the proposed biosecurity measures will specifically consider Ash dieback and amphibians only, but also include general best practice measures.
- 5.6 It is proposed that a simple spreadsheet log of the implementation of the RAMs be maintained by the ecologist. This log can be made available to representatives of WCBC and NRW on request or as required.

⁵ English Nature (2001). *Great Crested Newt Mitigation Guidelines*. Version: August 2001. English Nature, Peterborough.

⁶ *Amphibian & Reptile Groups of the United Kingdom Advice Note 4 – Amphibian Disease Precautions: A guide for UK Fieldworkers*. Version 2, revised March 2017.

⁷ *Wildlife and Countryside Act 1981*, as amended.

Proposed Existing Measures

- 5.7 The Ecology Addendum letter report concludes that the '*assessment, recommendations and conclusions contained within the PEA (Sections 4.2 and 5) remain applicable*'. It proposes the following avoidance/ mitigation measures with regards Great Crested Newts:
1. Implementation of non-licensed RAMs in accordance with a RAMs Method Statement.
 2. Should a Great Crested Newt be found at any time during the works then they would need to immediately cease and are unlikely to be able to re-commence until a 'disturbance' licence had been obtained.
 3. Temporary fencing (e.g., heras) will be installed and retained throughout the proposed construction phase in order to protect adjacent areas of terrestrial habitat of high potential value for Great Crested Newts.
 4. Wherever possible potential refugia/ hibernacula should be avoided and protected from inadvertent damage.
 5. The RAMs would include a Toolbox Talk to be delivered by the ecologist.
 6. The implementation of basic biosecurity measures (though this is not specifically covered under the Great Crested Newt sub-section).
- 5.8 The RAMs Method Statement and Toolbox Talk document would be adapted from that previously approved for the 2018/ 2019 development.

6 Conclusions

- 6.1 It is assumed that the above proposed measures would be attached as condition/s of the planning consent and that the implementation of these measures would be appropriate to avoid/ minimise any perceived potential impacts on Great Crested Newts.
- 6.2 The current NRW consultation response states that '*the population of great crested newts present within the environs of Wrexham Industrial Estate*' is of '*overall national importance*'. Whilst there is currently no designation that affirms this assertion, this broad statement is not contested here. However, different parts of Wrexham Industrial Estate (which is an arbitrary delineation) are likely to provide different services/ resources for the local 'population'.
- 6.3 The density of ponds within the close vicinity of the Lloyds site is low when compared with other parts of Wrexham Industrial Estate (e.g., the northeast quadrant). The Lloyds site does not provide any aquatic habitat and it is considered unlikely that the terrestrial habitat is of particular value for foraging/ hibernation (due to its location in relation to potential breeding waterbodies). That said, and as is acknowledged in the 2018 Preliminary Ecological Appraisal, '*it is possible that individual Great Crested Newts could be found more-or-less anywhere in this area*'. The Lloyds site, when considered in relation to existing known waterbodies, is most likely to be of value to Great Crested Newts for dispersal, if Great Crested Newts use the site at all. It is therefore hoped that by providing the retained habitat corridor as detailed above that the value of the site for dispersing animals will be maintained.



BRIDGE ROAD (NORTH)

A

A

A

Existing access road

DUNSTER ROAD

2

10 m 0 50 m
1: 1,000



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 -
Ecology, Additional Information**

Figure 1 - Habitat Corridor for Retention

Date: 01/02/2021

marches ecology

www.marchesecology.co.uk