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<By Email>

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Our Ref: C435-Lloyds-Addendum-101220-TK

Dear Tim

**Re – Proposed Raw Material Intake/ Cleaning and Weighing House, Lloyds Animal Feeds,
Bridge Road (North), Wrexham Industrial Estate, Wrexham – Ecology Addendum**

Introduction and Methodology

This letter report presents the findings of an ecology walkover survey at Lloyds Animal Feeds, Bridge Road (North), Wrexham Industrial Estate, Wrexham (approximate OS Grid Ref. SJ 383 496). It is provided as an Addendum to the Preliminary Ecological Appraisal (PEA) produced in 2018:

- 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.

The walkover survey considers a smaller part of the site than was surveyed for the PEA. The purpose of this walkover survey is to update the findings of the PEA specific to this smaller survey area. This letter report should be read in conjunction with the PEA. This letter report is provided as supporting information to a planning application for a new Raw Material Intake/ Cleaning and Weighing House along with associated infrastructure (Planning Ref. P/2020/0599).

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 hard-standing) plus up to approximately 30 m around this (hereon referred to as the 'survey site') (where access allowed¹). The survey site is indicated on *Figure 1* appended to this letter report. The walkover survey involved walking the survey

¹ 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.

site making notes on the habitat/ vegetation and assessing the potential for protected or other priority species to be present. It was undertaken on 19th November 2020. The weather was 25% white cloud, bright sunshine and occasional rain showers with a light breeze.

The MAGIC² website has been consulted to determine whether there have been any changes to the statutory protected sites close to the survey site and that may have implications for the proposed works since the PEA was completed. No information on non-statutory protected sites has been obtained as part of this current study.

The Proposed Development

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.

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).

The proposed development is presented on the Altrech Ltd plan mentioned above.

No further detailed information regarding the proposed development has been provided.

Survey Limitations

The following may be considered survey limitations:

- November is outside the accepted optimal survey period for such habitat surveys. Many species of plant may not have been visible.
- Access permission was not provided to private land beyond the survey site boundary.

None of the survey limitations listed above significantly affected the findings of the survey and therefore the conclusions and prescribed mitigation measures. The survey was conducted in accordance with a Covid-19 Risk Assessment. This did not give rise to any limitations at this site.

Results

Statutory Protected Sites

There is no change to the findings of the PEA.

Habitat and Flora

Target Note locations described in the text below are indicated on *Figure 1*; no separate target note descriptions are provided.

The following changes in the habitat (since the 2018 survey) were recorded within the survey site:

Target Note 1: Sparse ephemeral vegetation over limestone hardcore with 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). A small amount of *Alopecurus myosuroides*

² <http://www.magic.gov.uk/>

(Black-grass) was noted across the hardcore. This area was previously mapped as thin strips of amenity grassland and unimproved neutral grassland.

Target Note 2: 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 (*Target Note 1*) with the scrub at *Target Note 2* in the left background.

Target Note 3: Part of the resource recorded at *Target Note 9* in 2018 (small fragments of species-rich unimproved neutral grassland with scattered shrubs) has 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. A small amount of *Chenopodium polyspermum* (Many-seeded Goosefoot) was noted.



Sparse ephemeral vegetation over limestone hardcore at *Target Note 3*.

Target Note 4: 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). Bramble scrub is also encroaching into this area.



Part of the tall ruderal vegetation at Target Note 4.

Target Note 5: 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. It includes locally abundant Creeping Buttercup, frequent Oxeye Daisy, *Elytrigia repens* (Common Couch), False Oat-grass, *Agrostis capillaris* (Common Bent), *Calystegia sepium* (Hedge Bindweed), occasional *Senecio squalidus* (Oxford Ragwort), *Melilotus altissimus* (Tall Melilot), *Daucus carota* (Wild Carrot) and *Barbarea vulgaris* (Winter-cress).



Part of the earth mound at Target Note 5.



A view from the earth mound at *Target Note 5* towards the proposed development site (in front of right-hand silo).

Target Note 6: A large pile of brash as was recorded in 2018 (no change).



Brash pile at *Target Note 6*.

Target Note 7: A concrete drain feature, also present in 2018 (no change).

Target Note 8: New building.

Fauna

Only those species/ species groups that might reasonably be expected to be present at this location or potentially be affected by the proposed works are considered here.

Badger

No setts or other evidence of Badger activity were recorded within the survey site. Opportunities for sett excavation within the survey site are limited but are provided by the sloping ground and dense vegetative cover at *Target Notes 2 and 5* as well as along the southern site boundary. The habitat within the survey site is generally of low potential value for foraging.

Bats

The potential value of the site for bats has not changed since the 2018 assessment.

Great Crested Newts

The potential value of the site for Great Crested Newts has not changed since the 2018 assessment.

There is no aquatic habitat within the survey site of potential value for Great Crested Newts. Two waterbodies within 250 m and six further waterbodies within 500 m of the survey site were identified during the desk study conducted in 2018. The closest waterbody to the survey 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.

Parts of the survey site are characterised by unmanaged grassland, scrub and stands of tall ruderals. This resource provides suitable terrestrial habitat of moderate to high potential value for Great Crested Newts. The various piles of rubble, stored materials, pallets, wood chippings, logs and brash (e.g. *Target Note 6*) as well as building foundations and the edges of hard-standing within the survey site provide potential refugia/ hibernacula that could be utilised by Great Crested Newts.

Reptiles

The potential value of the site for reptiles has not changed since the 2018 assessment.

Birds

The potential value of the site for birds has not changed since the 2018 assessment.

Other Species

The desk study conducted in 2018 obtained a number of records of butterfly and moth including records of Dingy Skipper (*Erynnis tages*) and Grizzled Skipper (*Pyrgus malvae*) apparently from within the site (though this was not confirmed). Records of Hedgehog and Otter from nearby were also obtained.

Potential Ecological Constraints and Recommendations

Introduction

The information provided in the 'Introduction and Methodology' and 'The Proposed Development' sections of this letter report has been utilised to undertake a brief assessment of the potential ecological issues associated with the proposal. Refer to *Appendix 1* of the PEA for a summary of relevant legislation.

The survey site encompasses a larger area than the footprint of the proposal. For the purposes of this assessment the proposal and immediately surrounding area will be referred to as the 'proposed development site'.

Statutory Protected Sites

The assessment, recommendations and conclusions contained within the PEA (Sections 4.2 and 5) remain applicable.

Habitat

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.

It is understood that the trees previously identified at *Target Notes 4, 4a and 4b* in the PEA would not be directly impacted by the proposed concrete yard extension.

The assessment, recommendations and conclusions contained within the PEA (Sections 4.2 and 5) remain applicable. No particular mitigation measures are proposed (other than the avoidance/ best practice measures detailed in the PEA).

Flora

Two species of plant listed as Locally Rare (LR)³ and four listed as Locally Scarce (LS)⁴ in Williams (2014)⁵ were recorded from the wider site in 2018. The LR species recorded were Black-grass and Many-seeded Goosefoot; the LS species recorded were *Silaum silaus* (Pepper-saxifrage), *Catapodium rigidum* (Fern-grass), *Chenopodium ficifolium* (Fig-leaved Goosefoot) and *Lathyrus nissolia* (Grass Vetchling).

During the current walkover survey, a small amount of Black-grass was recorded at *Target Note 1* and Many-seeded Goosefoot from *Target Note 3*. Both species were previously recorded in 2018 from the area identified during the walkover survey as *Target Note 4*. It is possible that both have been lost from this area as the sward has established and closed over though this cannot be confirmed due to the time of year when the walkover survey was completed. Fig-leaved Goosefoot was also previously recorded at this location and similarly may no longer be present.

A small amount of Grass Vetchling was recorded during the walkover survey from a fragment of disturbed species-rich grassland adjacent to the soil mound at *Target Note 5*. Most of the grassland from which Pepper-saxifrage was previously recorded is no longer present. Fern-grass was not recorded during the walkover survey but is likely to remain present elsewhere within the wider site.

³ Found in 1-3 'Wells' sites in Denbighshire.

⁴ Found in 4-15 'Wells' sites in Denbighshire.

⁵ Williams, D. (2014). *Denbighshire (VC50) Rare Plant Register*. BSBI & NRW.

The Black-grass at *Target Note 1* will be directly impacted by the proposed development and may be lost from this location. Many of the LR and LS plants recorded from the site are suspected to occur on a casual basis at this location, possibly associated with the nature of the business of Lloyds Animal Feeds. It is likely that Black-grass will persist at this site or possibly be re-introduced in time. The locations from which Many-seeded Goosefoot and Grass Vetchling were recorded would not be directly impacted.

During the walkover survey *Vicia tetrasperma* (Smooth Tare) was recorded from the grassland adjacent to *Target Note 3*. This plant is currently listed as LS. Given the appropriate installation of temporary protective fence this location will not be impacted by the proposed development.

No particular mitigation measures are deemed necessary other than those detailed in the PEA under 'habitat'.

No plants listed in *Schedule 9* to the *Wildlife and Countryside Act 1981* (as amended) were recorded either within or close to the proposed development site.

An Ash sapling that exhibited the symptoms of 'Ash dieback' caused by the fungus *Hymenoscyphus fraxineus* was recorded from the area at *Target Note 4*. Due to the presence of Ash dieback on the site basic biosecurity measures will be implemented during the proposed development as recommended by the PEA.



Ash likely to be infected with Ash dieback.

Fauna

Badger

The assessment, recommendations and conclusions contained within the PEA (*Sections 4.2* and *5*) remain applicable.

Bats

There are no buildings or trees that could provide potential roosting features located within the proposed development site. The proposed new building will not be directly attached to any of the existing structures other than via the proposed conveyor, etc.

The assessment, recommendations and conclusions contained within the PEA (*Sections 4.2 and 5*) remain applicable.

Great Crested Newts

There is no aquatic habitat (suitable for Great Crested Newts) within the proposed development site or the survey site. Some of the terrestrial habitat within the proposed development site is of moderate to high potential value for Great Crested Newts and includes several features that could provide refugia/hibernacula. Due to the quality of parts of the terrestrial habitat within the proposed development site the risk that Great Crested Newts could be present is slightly greater than for the footprint of the proposal in 2018 (when the habitat impacted was largely of negligible/ low potential value).

However other than the quality of the terrestrial habitat the assessment, recommendations and conclusions contained within the PEA (*Sections 4.2 and 5*) remain applicable.

It is not currently known whether features such as the brash pile at *Target Note 6* would be directly impacted. It is recommended that wherever possible such features that provide potential refugia/hibernacula should be avoided and protected from inadvertent damage (by the installation of temporary fencing).

Whilst Reasonable Avoidance Measures (RAMs) are proposed it is acknowledged that the level of effort required will be greater than was the case prior to the previous development. For example, all dense vegetation will be subject to phased removal followed by hand-searches by a suitably qualified ecologist. All features that could provide potential refugia/hibernacula will be subject to a destructive search by a suitably qualified ecologist. The inherent risk (to the proposed development) with using such an approach would be that 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.

Reptiles

The habitat within the proposed development site is of greater potential value for reptiles than was the case in 2018. However other than the quality of the terrestrial habitat the assessment, recommendations and conclusions contained within the PEA (*Sections 4.2 and 5*) remain applicable.

It is recommended 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.

Birds

The habitat within the proposed development site is of slightly greater potential value for nesting birds (than was the case in 2018) as it includes small amounts of scrub. Otherwise the assessment, recommendations and conclusions contained within the PEA (*Sections 4.2 and 5*) remain applicable.

Whilst not a direct replacement it is recommended that three Vivara Pro Seville 32 mm Woodstone Nest-boxes⁶ and three Vivara Pro Seville 28 mm Woodstone Nest-boxes⁷ are installed. These nest-boxes should be installed in the woodland identified at *Target Notes 8 and 11* in the PEA.

The nest-boxes should be sited out of reach (though accessible for maintenance), 3 m off the ground ideally on large tree trunks. All of the nest-boxes should be located somewhere between (facing) north through east to southeast; avoiding prevailing winds and direct sunlight where possible. These nest-boxes should be installed either by, or under the direction of, a suitably qualified ecologist to ensure correct installation.

Other species

The assessment, recommendations and conclusions contained within the PEA (*Sections 4.2 and 5*) remain applicable.

Some of the habitat that would be directly impacted is of potential value for Hedgehogs (e.g. brash pile at *Target Note 6*). As a precautionary approach a 'watching brief' should be maintained by site personnel during the works, especially any clearance of shrubs/ other dense vegetation. Any Hedgehogs located should be removed to suitable dense habitat outside the development site. If clearance works are programmed for winter months (when Hedgehogs would be hibernating) further advice should be sought from a suitably qualified ecologist.

If you require any further information or have any queries regarding the findings presented in this letter report please do not hesitate to contact me.

Yours sincerely



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Partner

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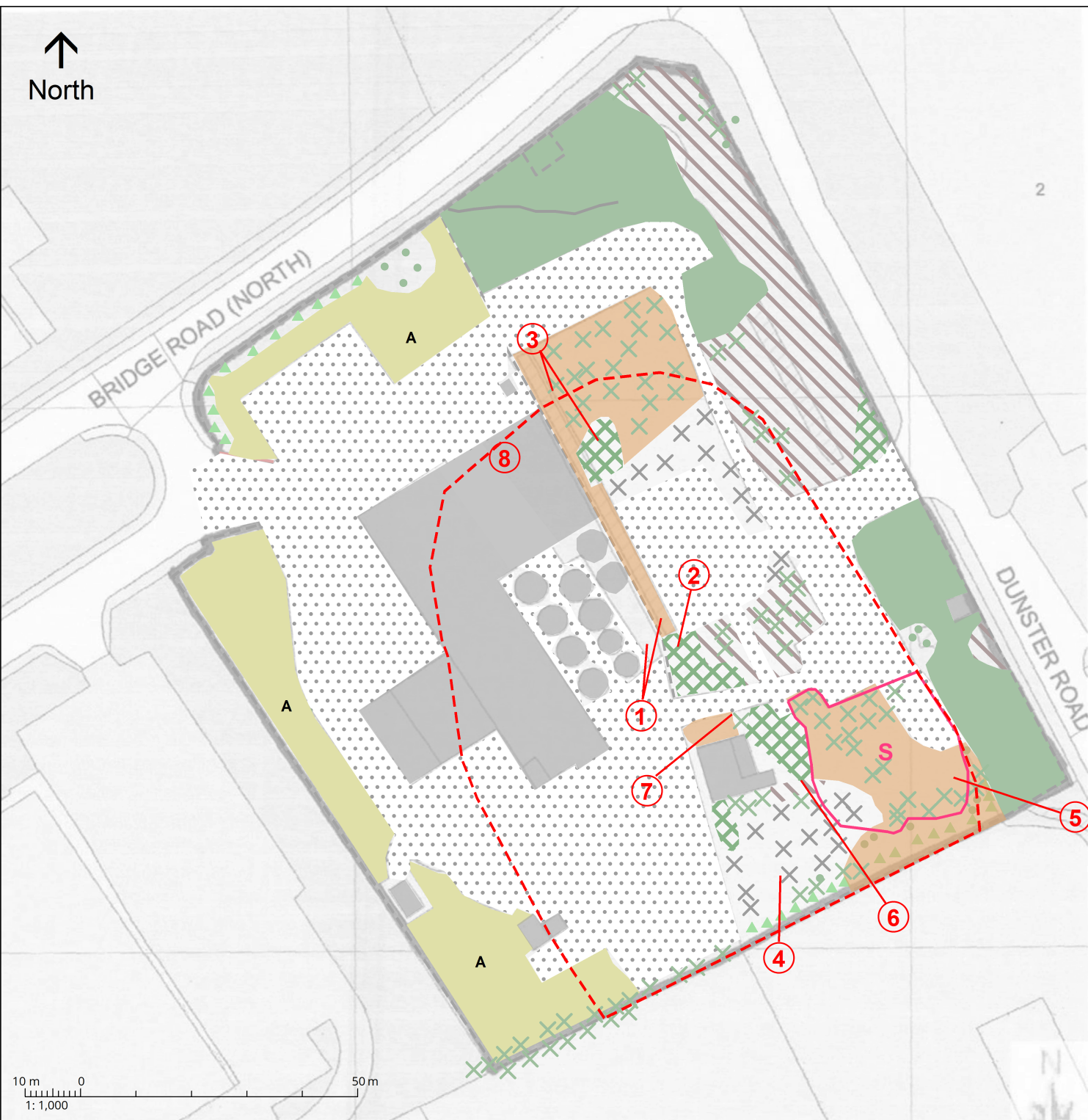
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6

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-  Spoil pile
-  Approximate survey site boundary
-  Target Note

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 Addendum**

Figure 1 - Target Notes

Date: 24/11/2020

marches ecology

www.marchesecology.co.uk