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RE: response to comments from Natural Resources Wales (NRW) regarding a Habitat Suitability Index (HSI) report for great crested newts (GCN) in relation to the erection of stables block including equine solarium and wash box and construction of 40m x 20m riding area illuminated with 4 no. high floodlights at Caretaker House, Hafod Road, Ruabon, Wrexham (planning reference: P/2019/0898).

A letter from NRW (letter reference: CAS-105530-P5J4) dated 16/12/2019 detailed the following comments regarding the HSI report by Pearce Environment Ltd (report reference):

- 1) The failure to consider dispersal of a nationally important population of GCN (dispersal distances can be up to 1.2 kms).
- 2) Failure to effectively consider measures to prevent GCN accessing the site during construction - We anticipate that appropriate mitigation measures will entail the implementation of Reasonable Avoidance Measures (RAMs), such as the erection of a 1-way amphibian fence, prior to and throughout the duration of construction operations; together with the clearance of individuals from working areas.
- 3) Details of timing, phasing and duration of construction activities and conservation measures.
- 4) Failure to consider biosecurity issues. The Chytrid fungus that affects amphibian has been recorded at Johnstown.
- 5) Lack of detail in respect of long-term habitat compensatory proposals - Submission of further details concerning ecology area including size, location, tenure and long term management of the identified ecology area.
- 6) The ecological submission fails to consider the implications of the proposal on the amphibian assemblage (as a feature of the SSSI). Further information should be submitted in line with the requirement above.

In response to each point:

- 1) It has been considered within the HSI report that the site is located within key connecting habitat associated with the SAC/ SSSI. However, the value of the terrestrial habitats upon the site itself are very low (grazed pasture) and potential dispersal corridors are most likely hedgerows – all of which lie off-site and none of which are to be affected by the proposals. The report has been slightly amended to show our thought processes more clearly.
- 2) We consider the low risk of GCN/ amphibians commuting across the site can be mitigated for by way of the strict RAM's detailed within the report. By restricting groundworks to the winter months (when amphibians are least active) it is highly unlikely GCN/ amphibians will be moving across the site.
- 3) As above.
- 4) There are no INNS on the site and given the nature of the proposed development (no requirement to enter water or access the SAC/ SSSI to facilitate the development), we consider the transmission of Chytrid unlikely. The report has, however, been amended to include biosecurity protocol is followed as a precautionary measure (these are simple to implement).
- 5) We have included enhancement measures in the report to improve WB1 and the surrounds for GCN (increasing the value and area of suitable breeding/ hibernation/ dispersal habitat) – we consider this ample considering the low-value of the site.
- 6) All measures detailed for GCN will also protect and enhance for other species of amphibian (smooth/ palmate newts, common toad, common frog). We have put a statement within the report to make this clear.