



Marches

Ecology

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Mrs Julie Selvey
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Rhosllanerchrugog
Wrexham
LL14 2DJ

9th January 2013

Our Ref: C209-MrsSelvey-RAMs-090113-TK

Dear Mrs. Selvey

Re – Installation of All-weather Area for Horse Riding Use (Planning Ref. No. P/2012/0737) on Land to the Rear of Lllys y Pant, Rhosllanerchrugog – Great Crested Newt Reasonable Avoidance Measures

Introduction

Marches Ecology was commissioned by Mrs. Selvey to provide information with regards Great Crested Newts and any Reasonable Avoidance Measures (RAMs) that may be required due to the proposed installation of an all-weather horse riding area (Planning Ref. No. P/2012/0737) on land to the rear of Lllys y Pant, Rhosllanerchrugog (NGR 329147, 345866). This letter is provided in support of the planning application.

The requirement for this letter/ RAMs was identified initially in an email from Simon Greenland (Planning Officer, Wrexham County Borough Council) dated 27th November 2012. It was subsequently discussed with Emma Broad (Biodiversity Officer, Wrexham County Borough Council). Emma confirmed the requirement for the following information to form part of the planning submission:

- A Great Crested Newt (*Triturus cristatus*) Reasonable Avoidance Measures Method Statement.
- A plan and covering letter detailing the proposed planting of a hedge or an area of native scrub in land within the applicant's control. Information with regards ongoing management and protective fencing needs to be included.

This letter and attached plan provides the information required as listed above. Information to inform this document was collected during a brief site visit on 4th January 2013 by Tom Knight of Marches Ecology. The weather at this time was partly cloudy with some sunny periods and a moderate breeze.

It should be noted that a similar letter detailing Reasonable Avoidance Measures was prepared and submitted in 2009 in support of a planning application for the erection of a stable block within the same parcel of land (Planning Ref. No. P/2009/0261). This letter concluded the following:

'... due to the small size of the proposed development, the considerable distance to the nearest waterbody that is known to support Great Crested Newts and that there are no other waterbodies nearby that animals may be dispersing to, it is considered unlikely that Great Crested Newts may

utilise the terrestrial habitat within the proposed development site. No impacts due to the proposed development on the Favourable Conservation Status of the local Great Crested Newt population are envisaged.

Planning permission was granted for the stable block and the RAMs letter was accepted. Furthermore the Countryside Council for Wales (CCW) in providing a response (Letter Ref. ME/MMJ/SJ24.7/1758282, dated 26/11/12) on the current planning application concluded the following:

'...the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of any populations of great crested newt' however 'If the great crested newt is recorded within the boundary of the application site, operations may only proceed after an appropriate licence has been issued by Welsh Government'.

Proposed Development

The proposal briefly concerns the installation of an all-weather area for personal horse riding use. It would be located in an existing fenced paddock and extend to approximately 39 m by 16 m (624 m²). It would be formed with a clean stone drainage layer to be covered with a wood-fibre surface layer. The wood-fibre would be contained by a kick-board around the perimeter.

Habitat Assessment

Proposed Development Site

The proposed all-weather horse riding area is to be located in a small rectangular field unit (see photo below; taken from northwest corner looking south/ southeast). This field unit is bounded on the north, south and east sides by timber board fencing with post-and-rail fence on the west side. It is characterised by disturbed but moderately species-rich neutral grassland. The grassland contains frequent *Lolium perenne* (Perennial Rye-grass), *Holcus lanatus* (Yorkshire-fog), *Trifolium repens* (White Clover) and lesser amounts of *Plantago lanceolata* (Ribwort Plantain), *Senecio jacobaea* (Common Ragwort), *Ranunculus repens* (Creeping Buttercup), *Ranunculus acris* (Meadow Buttercup) and *Poa annua* (Annual Meadow-grass). The entire field unit is heavily poached and browsed with approximately 30-50% bare soil across most of the area. The grass sward is largely no more than 0.05 m in height. There is a narrow band of *Urtica dioica* (Common Nettle) adjacent to the northern boundary although this is also well trampled.

The grassland within this paddock does not provide potential vegetative cover for Great Crested Newts and there are no features that could potentially be utilised as refugia.



Other Land within the Applicant's Control

To the west and south of the rectangular field unit (proposed development site) there are further similar paddocks within the applicant's control (see photo below). These fields also offer little potential cover or potential refugia for Great Crested Newts.



This field is bounded to the west by a hedge. The hedge is approximately 1.5 m high and 1.5 m wide. It is dominated by *Crataegus monogyna* (Hawthorn) with lesser amounts of *Sambucus nigra* (Elder), *Ilex aquifolium* (Holly) and *Rosa canina* agg. (Dog-rose). There is a further hedge on the southern boundary of the land-holding. This hedge is unmanaged, is approximately 4-5 m high and 3-4 m wide and is often dominated by *Ilex aquifolium* (Holly) with frequent *Crataegus monogyna* (Hawthorn). These hedges provide potential foraging/ dispersal habitat for Great Crested Newts. Further to the west are residential properties along Pant Hill.

To the east of the field within which the proposed all-weather surface would be located is a larger field that is currently unmanaged (and is outside the applicant's land-holding). It supports rank grassland with scattered patches of scrub. This field provides potential foraging/ dispersal habitat for Great Crested Newts. To the north is located Llys y Pant.

Status of Great Crested Newts in the Area

From previous work completed in this area it is known that there are no waterbodies within 500 m of the proposed development site. The closest waterbody to the proposed development site is located within Stryt Las Park; approximately 700 m to the east of the site at its closest point (NGR 329885, 345810). This waterbody is known to support/ have supported a breeding (sub-) population of Great Crested Newts. Data previously supplied by CCW and Wrexham Countryside Service indicates that the Great Crested Newt meta-population in this area may currently be assessed as at least medium and often large (as defined in English Nature 2001¹). It is known that there are also some waterbodies near Gardden Hall although they are not shown on the OS map. These waterbodies are also in excess of 600 m from the proposed development site.

The waterbody at Stryt Las Park detailed above is included within the Johnstown Newt Sites Special Area of Conservation (SAC)/ Stryt Las a'r Hafod Site of Special Scientific Interest (SSSI). Great Crested Newt is the *Annex II* species that is the primary reason for selection of the site as an SAC. The closest part of this protected site to the proposed development is approximately 567 m away.

The NBN Gateway² provides a number of records for Great Crested Newt from the SJ24 10-km square; the closest is from Stryt Las Park.

Summary Evaluation

There is no aquatic habitat within the proposed development site. The terrestrial habitat within the footprint of the proposed development is of very low/ negligible potential value for (foraging/ dispersing) Great Crested Newts. To the east of the proposed development site it is linked with open countryside including a wider hedgerow network and the habitat mosaic associated with the Afon Goch valley. This landscape offers potential terrestrial habitat that may be considered of high quality for Great Crested Newts. The Afon Goch valley is directly linked to, and indeed forms part of, the Stryt Las a'r Hafod SSSI/ Johnstown Newt Sites SAC near Gardden Hall. However no habitat features of particular potential value are directly connected to the proposed development site.

Great Crested Newts commonly move between ponds that are within 250 m of each other, and have been recorded travelling over 1 km (English Nature 2001). However studies have indicated that most individuals will utilise a much smaller area than this and remain very close to their breeding pond (*e.g.* Jehle *et al.*, 2011³). The potential presence of Great Crested Newts in terrestrial habitat is governed more by the proximity of a suitable breeding pond than by the quality of the terrestrial habitat. The nearest waterbody (and known breeding location) is located a considerable distance from the proposed development site. Although the Afon Goch valley could be considered to provide habitat linkage between the applicant's land-holding (though not necessarily the proposed development site) and the Stryt Las protected site there are no waterbodies near the site or to the west of Pant Hill that newts might travel towards (Thereby crossing the proposed development site). Further there are large areas of suitable terrestrial habitat near to Stryt Las that are more likely to be used by Great Crested Newts than that within the site.

As such due to the small size of the proposed development, the considerable distance to the nearest waterbody that is known to support Great Crested Newts and that there are no other waterbodies nearby that animals may be dispersing to, it is considered unlikely that Great Crested Newts may utilise the terrestrial habitat within the proposed development site. No impacts due to the proposed

¹ English Nature (2001). *Great Crested Newt Mitigation Guidelines – Version: August 2001*. English Nature, Peterborough.

² <http://www.searchnbn.net>

³ Jehle, R., Thiesmeier, B. & Foster, J. (2011). *The Crested Newt - A Dwindling Pond-dweller*. Laurenti-Verlag, Bielefeld.

development on the Favourable Conservation Status of the local Great Crested Newt population are envisaged.

Reasonable Avoidance Measures

As the proposal presents no risk to [individual] Great Crested Newts it is considered that Reasonable Avoidance Measures are neither justifiable nor required. However due to the importance of the population at Stryt Las Park and connected habitat along the Afon Goch valley it is suggested that a precautionary approach is adopted.

Immediately prior to any (preparatory or construction) works on the site a hand search should be undertaken for amphibians. This hand search should be completed by a suitably licensed ecologist. Any amphibians found would be removed to an appropriate place outside the proposed development site. All remaining vegetation within the proposed development site would then be strimmed/ cleared to a height of approximately 0.1 to 0.15 m (should it not be below this height already). The cut vegetation should subsequently be removed from the proposed development site. It should be noted that if at any time a Great Crested Newt is found during this process all work must immediately stop at the site and the Countryside Council for Wales should be consulted. It is likely that in this situation a Welsh Government 'development' licence will be required in order for works to legally proceed.

Proposed Hedge Planting

Introduction

The site visit involved a brief review of all of the land within the applicant's control. This review considered an appropriate location for the planting of a hedgerow. The proposed hedge planting does not form part of any required ecological mitigation or compensation measures due to the proposed development but is rather offered as (biodiversity) enhancement.

The unmanaged hedge on the southern boundary of the land-holding has an approximate 10 m long gap in the southwest corner (see photo below). This hedge is linked to a wider hedgerow network and as such may form part of a dispersal route that could be utilised by amphibians as well as other wildlife. To enhance the value of this hedgerow it is proposed to plant the 10 m gap with a native-species hedge to connect the hedges on the southern and western boundaries of this field. This hedge would be fenced off from the remaining paddock to protect it from browsing by the horses.



The attached hand-annotated plan shows the location of the proposed hedge planting along with the re-aligned fence. This fence would extend along the whole of the southern end of this field thus offering similar protection from browsing to the existing stretch of hedge.

Hedge creation and management

The ground should be prepared along the length of the proposed hedge by rotovating a 1 m wide strip to provide a good tilth. Application of a glyphosate-based herbicide may be required prior to planting or an alternative method of weed control could be employed. The supplier should be consulted for advice on planting and establishment.

The new stretch of hedge will reflect the existing composition. It should include 50% *Ilex aquifolium* (Holly), 30% *Crataegus monogyna* (Hawthorn) and 20% *Prunus spinosa* (Blackthorn). Hedging plants (generally 1 year or 1 + 1) should be used and these should ideally be of local, or at least certified British, provenance. Welsh Trees⁴ could provide suitable plants. Two staggered rows should be planted with approximately 30-45 cm between plants in each row and 0.6 to 1 m between the rows. The individual plants should be notch planted between October and March using a T- or L-shaped notch following initial removal of the turf. Each shrub should be protected with a spiral guard attached to a stake/ cane. Alternatively the hedge could be enclosed with Rabbit-proof fencing. Frosty periods will be avoided as this may harm the shrubs.

The young plants should be cut back in the first year to approximately one-third of their height to promote bushy growth. Once the hedge has been planted it should be kept weed-free through appropriate application of glyphosate-based herbicide such as Roundup (although use of herbicide will be kept to a minimum). This maintenance operation should be undertaken once a year for the first three years during the growing season. Any losses should be replaced in the first five years after planting during October/ November.

Once established the hedgerow will be subject to the same management regime as the existing stretch, e.g. non-intervention, so as to promote an overgrown structure.

Fence specification

The proposed fencing will be re-aligned so that it is parallel to, but approximately 3 m away from, the southern field boundary as shown on the attached plan. This should provide sufficient distance from the hedge to protect it from browsing by horses (although the hedge plants should be a minimum of 2 m from the re-aligned fence). The fencing should be a similar specification to that utilised elsewhere around the applicant's fields; either post-and-rail with three or four rails or standard galvanised wire stock fencing with round stakes, a top rail and single strand of barb-wire.

Further information about appropriate management and protection of hedges and trees is available in Simpson (2002)⁵.

⁴ <http://www.welshstrees.co.uk/>

⁵ Simpson, R. (2002). *Trees and Hedges Advice - Note (001)*. Horse Pasture Management Project. Available online: http://www.surreycc.gov.uk/__data/assets/pdf_file/0007/166363/Trees-and-Hedging.pdf

Should you require any further information with regards this letter and the attached plan please do not hesitate to contact me.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'TKnight', enclosed within a faint, irregular rectangular border.

Tom Knight
Partner

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07928 212545

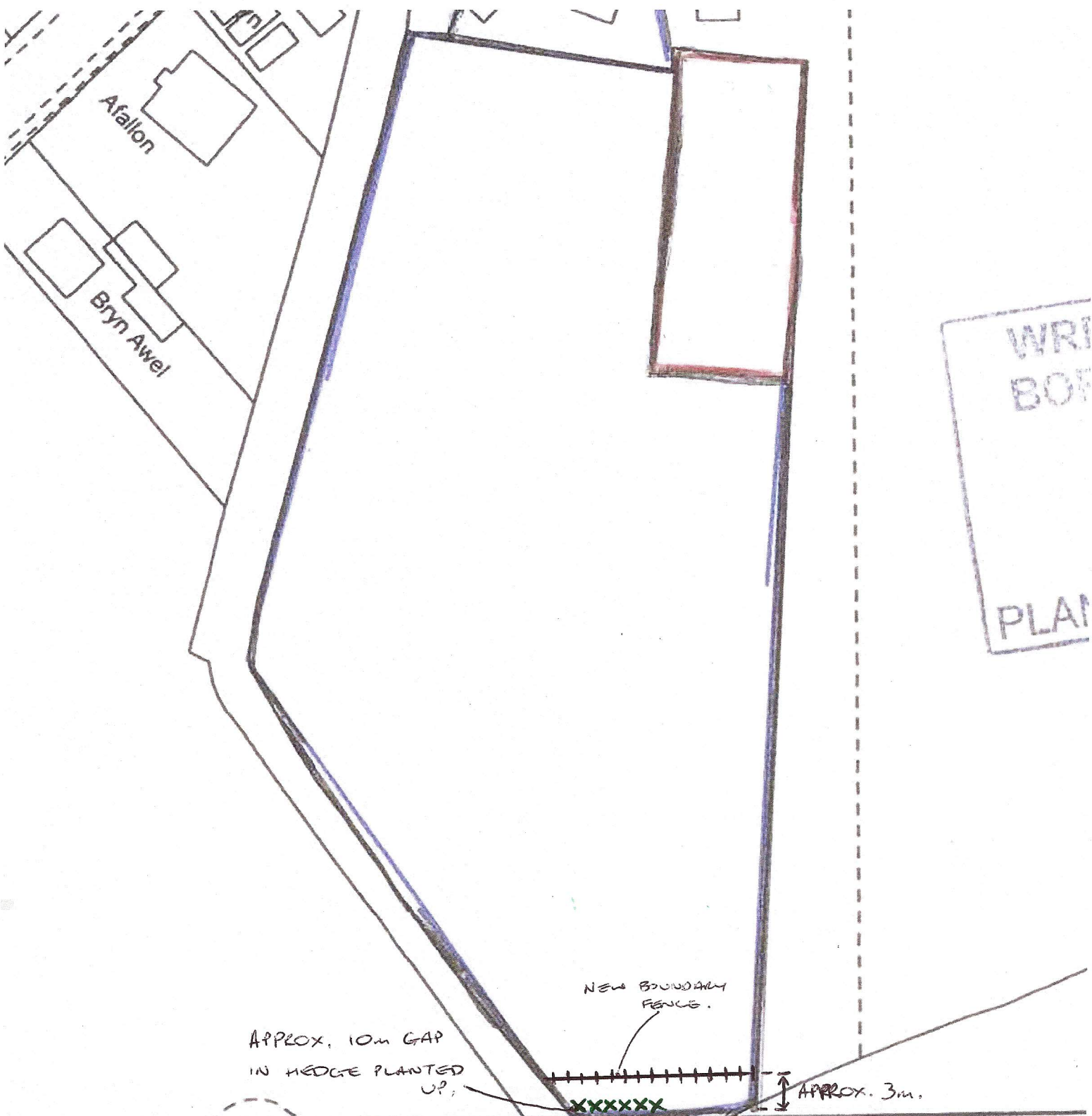
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PROPOSED ALL-WEATHER AREA FOR HORSE RIDING, ALLYS 1 PANT, RHOS.

(PLANNING REF. P/2012/0737)

- LOCATION OF PROPOSED NEW HEDGE + FENCING,



as issued on 13 November 2008 shows the state of this title plan